

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE SHAREHOLDERS AND OTHER PARTICIPANTS TO THE REMOTE SHAREHOLDERS MEETING OF «THESSALONIKI PORT AUTHORITY S.A.»**

### **A. PROVISION OF INFORMATION TO DATA SUBJECTS**

“THESSALONIKI PORT AUTHORITY S.A.” (hereinafter referred to as “THPA”), in its capacity as the controller of personal data in the context and in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as “General Data Protection Regulation” or “GDPR”), the Law 4624/2019 and in general according to currently applicable legislation in force with regard to the protection of personal data, shall hereby provide the following information on the processing of the personal data of the natural persons who are or were registered shareholders of THPA, of those who have the capacity of the shareholder of THPA, of their representatives as well as of the pledged creditors of the shares, anyone who has voting right over the shares, and in general derives or/and exercises rights over the shares of THPA, their representatives, of those who exercise the voting right by representing legal entities as well as of those who participate, under any capacity, to the Annual General Meeting of Shareholders that will take place remotely in real-time via teleconference on May 9<sup>th</sup> 2023, as well as any repeat meeting thereof (hereinafter, for the purposes of the present, all the above categories of natural persons will be jointly referred to as “Shareholders” and each of them as “Shareholder”).

In addition, THPA in its capacity as the controller of personal data, in accordance with the GDPR, the Law 4624/2019 and the other provisions on the protection of personal data, informs the natural persons other than the Shareholders, who will participate in teleconference (video conference) of the remote General Meeting, such as Members of the Board of Directors of THPA, executives of THPA, auditors and other third parties, that it processes the respective personal data, which are collected directly by the data subjects in question, for the purposes of the legitimate interests pursued by THPA for said processing.

It shall be noted that processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

THPA, as the issuer of the shares, legally processes the personal data of the Shareholders, under the aforementioned capacities, always for legitimate and fair purposes, following the principles of the fair and transparent processing, applying the appropriate technical and organizational measures, in compliance with the requirements of the GDPR as well as the current legal framework, always having as a guide and primary concern the safeguarding and protection of personal data and the fundamental rights of data subjects.

Following the above, THPA, in compliance with the principle of transparency, informs Shareholders with the present document about the terms of processing of personal data concerning them.

#### **I. What kind of data do we collect?**

The personal data of the Shareholders which are collected and processed by THPA in the context of the operation and service of the shareholder capacity and in order to carry out the tasks required under the shareholder relationship are the most necessary, adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Indicatively the main categories of personal data concerning the Shareholders and which the THPA processes for legitimate purposes of processing, are the following:

- a) Identification data, such as: name and surname, father’s name, identity card number or passport number or other equivalent document, tax identification number, profession, citizenship, and other demographic data.

- b) Contact information such as: postal and e-mail address, fixed and/or mobile telephone number, etc.
- c) Number and type of shares.
- d) Investor Share Code Number in the Dematerialized Securities System (DSS).
- e) Data relating to the capacity under which the Shareholder participates to the General Meeting and the relevant supporting documentation.
- f) Correspondence and communication data.
- g) Data relating to the participation and the exercise of the voting right of the Shareholder in the General Meeting of THPA, information regarding any requests addressed to THPA, signature of the Shareholders and in general any information in the context of implementing the current rules on financial instruments markets.
- h) Audio data (audio recording) in case the Shareholder takes the floor during the General Meeting.

## II. Where do we collect your data from?

The above personal data are collected either directly from the Shareholders for the performance of tasks concerning them – who must take care to update of their personal information, so that the Shareholders' Registry remains update up-to-date and accurate –either from third persons authorized by the Shareholders, either from the societe anonyme under the name “Hellenic Central Securities Depository S.A.”, which, at its capacity as operator of the Dematerialized Securities System (DSS), keeps the details of identification of the Shareholders as well as other information related to THPA's shareholder structure, any transactions on the shares and are provided to THPA through electronic records, according to the provisions of the legislation in force and the Regulation of the Dematerialized Securities System (DSS).

THPA, hereby notifies the Shareholders that, for reasons of participation to the remote General Meeting of the Shareholders of THPA, or any adjournment or repeat meeting thereof, will be collected and processed either by THPA either by the societe anonyme under the name “Hellenic Central Securities Depository S.A.”, processor on behalf of THPA, to which THPA has assigned the organization of any remote General Meeting, the codes of process of the Shareholders in the online platform <https://axia.athegroup.gr/>, through which they will have the possibility to participate and vote remotely in the General Meeting (hereinafter referred to as the “Online Platform”). Furthermore, THPA informs the Shareholders that, according to article 131 (way of voting in the General Meeting) par. 2 of Law 4548/2018, the remote voting is obvious and the exercise of the right to vote by the Shareholder and the content of his/her vote, if requested, may be communicated to the other participants in the General Meeting, Shareholders.

At the same time, THPA, proceeds with the processing of the following data of the natural persons other than the Shareholders, who will participate in teleconference (video conference) of the remote General Meeting, such as Members of the Board of Directors of THPA, executives of THPA, auditors and other third parties, which are collected directly by the data subjects in question, for the purposes of the legitimate interests pursued by THPA for that processing:

- a) Identification data, such as name, surname, father's name, identity card, passport or other equivalent document.
- b) Data relating to the capacity under which such persons are entitled to participate to the General Meeting.
- c) e-mail address (email), mobile telephone number, in order for the natural person to participate to the teleconference.
- d) Image -sound (video) data from the participation of the natural person to the General Meeting.

## III. Why do we collect your data and how do we process them?

THPA collects the personal data of the Shareholders and other natural persons that will participate in the

General Meeting, as above mentioned, and in general processes them, for the fulfillment of legitimate purposes of processing and always according to valid legal basis which establish the lawfulness of the processing.

Specifically, THPA processes the personal data of the natural persons in order: a)

To identify the Shareholder.

- b) To communicate with the Shareholder.
- c) To verify the possibility and legality of exercising Shareholders' rights, according to the relative legislation and moreover to facilitate the Shareholders to exercise their rights, according to the law (indicatively exercise of the right of participation and voting right and in general exercise of the rights of the Shareholders in the General Meetings, shareholder confirmation, drawing up a shareholders' list, keeping minutes of the General Meeting, participation to corporate actions (i.e. dividend distribution, share capital increase etc.).
- d) To disclose transactions of liable individuals to the Athens Stock Exchange, to monitor transactions on THPA's shares.
- e) To perform THPA's contractual obligations towards the Shareholders (i.e. dividend distribution) and in general to fulfill THPA's obligations towards the Shareholders.
- f) To comply with legal obligations.
- g) To fulfill and support legal rights, to protect and service the legitimate interests of THPA (such as in case of legal claims of THPA), except where such interests are overridden by the interests or fundamental rights and freedoms of the data subjects which require protection of personal data.
- h) To fulfill the obligations arising from provisions of tax legislation and other compulsory provisions.
- i) To manage and maintain the Shareholder Register, in accordance with the applicable legal provisions.
- j) To publish acts and information of THPA in the General Commercial Registry (G.E.M.I.), the Athens Stock Exchange or on the website of THPA, as required by law.
- k) To respond to requests of the Shareholders, carry out requests of the Shareholders in connection with the services provided by THPA (e.g. issuance of certificates), to provide replies and clarifications to specific inquiries or requests addressed to THPA by the Shareholders.
- l) To keep an archive of THPA's shareholders.

#### IV. Who are the recipients of the personal data?

Access to the personal data of the above natural persons shall be awarded only to the THPA's employees, within the range of their responsibilities and in the exercise of the duties assigned to them and specifically those who are responsible for Shareholders' identification and for reviewing the lawful exercise of their rights.

THPA shall not transmit or disclose the personal data except in case to:

- a) Natural persons and legal entities, to which THPA assigns the execution of certain tasks on its behalf under the condition of confidentiality, such as, inter alia, database management companies, file storage and recordkeeping companies, postal services providers, providers of services related to the development, maintenance and customization of IT applications, e-mail services providers, companies providing webhosting services (including cloud services) lawyers, law firms, chartered accountants or audit firms.
- b) The societe anonyme under the name "Hellenic Central Securities Depository S.A.", to which THPA has assigned, as the processor on behalf of THPA, the organization of the remote General Meeting as well as any sub-processors (further processors) the processing for the societe anonyme under the name "Hellenic Central Securities Depository A.E." (such as the company Zoom Video Communications Inc., which provides the ZOOM tool / services team with which video conference is provided through cloud services) which is maintained within the European Economic Area (E.E.A.)

THPA S.A.

- c) Supervisory, audit, tax, independent, judicial, police, public and/or other authorities and bodies within the scope of their statutory tasks, duties and powers (i.e. Hellenic Capital Market Commission, Financial and Economic Crime Unit, Greek Financial Intelligence Unit).
- d) Other THPA shareholders, as appropriate, in accordance with the law.

THPA has lawfully ensured that any processors of personal data, acting on its behalf, according to the above mentioned, shall meet all requirements and provide sufficient guarantees to implement appropriate technical and organizational measures in such a manner that such processing will meet the requirements of the GDPR and in general of the applicable legislative and regulatory framework and ensure the protection of the rights of the data subjects.

#### V. Are the data transferred outside the European Economic Area (E.E.A.) or to international organizations?

THPA may transfer Shareholders' personal data to countries outside the E.E.A. (third countries) or in international organizations under the following circumstances:

- a) when the European Commission has issued an implementing act for the adequacy of personal data protection level within that third country, or the international organization.
- b) when the Shareholder has been specifically informed and has given her/his express consent to THPA, provided also that the other conditions laid down in the legislative framework are met,
- c) where the transfer is necessary for the execution of contractual obligations,
- d) where the transfer is necessary for the establishment, exercise or support of legal claims or the defense of THPA's legal rights,
- e) where the transfer is necessary under a statutory provision or a transnational convention or an international convention, or
- f) for the purposes of the THPA's compliance with rules relating to automatic exchange of information in the taxation area, as those are provided for by the statutory and regulatory framework.

In order to fulfill the obligations under points e) or f) above, THPA may transfer shareholder's personal data to the competent national authorities, in order for them to forward these data to the relevant authorities of third countries.

#### VI. For how long are the data retained?

The personal data will be stored/kept by THPA for the period of time determined by law and in general required by the legal and/or regulatory framework in force or is required for the purposes of legitimate interests of THPA, for the exercise of claims and for the defense of THPA in case of litigation, for the pursuit of claims of THPA as well as for the performance of contractual obligations and in general in accordance with the respective legal basis and the purpose of their processing.

#### VII. What rights does the shareholder have for the protection of her/his personal data?

According to GDPR, the personal data subject has the following rights, which may be exercised on case by case basis:

- a) To know which personal data, concerning her/him, are being stored and processed by THPA, their source as well as the purposes of the processing, the categories of the personal data, the recipients or categories of recipients (right of access).

- b) To request for the rectification and/or supplementation of this personal data, so as to be complete and accurate, by submitting any necessary document which shows the need for supplementation or rectification (right to rectification). This is at the same time a Shareholder's obligation.
- c) To request the restriction of processing concerning her/his personal data, among others, when the accuracy of the personal data is contested or the processing is unlawful or the purpose of the processing was eliminated and provided that there is no legitimate reason to retain them (right to restriction of processing).
- d) To deny and/ or object to any further processing of her/his personal data retained by THPA (right to object).
- e) To request for deletion of her/his personal data from THPA's records, when inter alia, there is no longer valid purpose of processing, subject to THPA's obligations and legal rights to retain them, pursuant to the current applicable laws and regulations (right to be forgotten).
- f) To request for the transfer of the data she/he has provided to THPA, in a structured, commonly used and machine-readable format or has the right to ask to transmit those data to another controller, provided that the processing is based on consent and is carried out by automated means and subject to THPA's legal rights and obligations to retain the personal data (right to data portability).

THPA has, in any case, the right to refuse the satisfaction of Shareholder's request if, indicatively, the personal data processing is necessary for the retention of subject's capacity as a Shareholder and/or the possession of her/his voting right, for the exercise of her/his rights as THPA's Shareholder or as person having voting right, as well as in case they are necessary for the establishment, exercise or defense of THPA's rights, the compliance of THPA with its legal obligations or the fulfilment of THPA's obligations towards its shareholders.

THPA reserves in any case the right to deny the deletion of Shareholder's personal data if such personal data is essential for the purposes of maintaining the archive of the THPA's shareholders (pursuant to the aforementioned Section III.I), as well as in any case their processing or retention is necessary for the establishment, the exercise and the defense of THPA's legal rights or the fulfilment of THPA's obligations.

The exercise of the right to data portability (point f above) does not imply the deletion of data from THPA's records.

### VIII. How can the shareholder exercise her/his rights?

In order to exercise her/his rights, the Shareholder may address THPA:

- In writing to:  
Thessaloniki Port Authority S.A.  
Pier A, Inside the Port, Thessaloniki P.C. 54625  
C/O: Data Protection Officer (DPO)
- Through email to THPA's Data Protection Officer to: [dpo@thpa.gr](mailto:dpo@thpa.gr)

THPA shall use its best endeavors to address the shareholders' request within thirty (30) days of its receipt. The abovementioned period may be prolonged for sixty (60) more days, if deemed necessary according to the discretion of THPA, taking into account the complexity of the issue and the number of the pending requests. THPA shall inform the Shareholder within thirty (30) days after receipt of her/his request in any case of prolongation of the abovementioned period, stating the reasons of such prolongation.

If THPA does not take action in relation to a Shareholder's request, it shall inform the Shareholder without delay within thirty (30) days of the receipt of her/his request at the latest, for the reasons it did not take action and for the possibility of the shareholder to submit a complaint and initiate judicial proceedings.

The abovementioned service is provided free of charge. However, in case the requests are obviously unfounded, excessive or repetitive, a reasonable fee may be imposed after the Shareholder has been informed accordingly, or THPA may refuse to respond to such requests.

THPA S.A.

Pier A, Inside Port of Thessaloniki, p.c 54625, Thessaloniki, Tel. +30 2310 593335, ([www.thpa.gr](http://www.thpa.gr))

#### IX. How are the shareholder's rights protected?

THPA applies an information security management system to ensure the confidentiality and security of the shareholders' data processing and the protection of personal data against accidental or unfair destruction, loss, alteration, unauthorized disclosure or access and any other form of unfair processing.

#### X. Complaints submission

The Shareholder has the right to file a complaint with the Personal Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)), which is the competent supervisory authority for the protection of the fundamental rights and freedoms of natural persons with regard to their personal data processing, when she/he assumes that her/his rights are infringed in any way, as well as the right to initiate judicial proceedings.

### B. CONTACT DETAILS

#### I. Data Controller -Apostolos Papadopoulos-Almeida

Thessaloniki Port Authority S.A.

A Pier, Inside the Port, Thessaloniki P.C. 54625

Contact phone number: +30 2310 593 335, Email: [shares@thpa.gr](mailto:shares@thpa.gr)

#### II. Data Protection Officer

Thomas Dimitriou & Stylianos Mavridis

Address: same as above

Email: [dpo@thpa.gr](mailto:dpo@thpa.gr)