



Information on the processing of Personal Data for the shareholders of “AVAX SA”

A. PROVISION OF INFORMATION TO DATA SUBJECTS

“AVAX SA” (hereinafter referred to as the “Company”), informs its shareholders that for the purpose of their remote participation to the Annual general Meeting of the Company or any repeat meetings (hereinafter referred to as the “AGM”), the access codes of shareholders to web platform <https://axia.athexgroup.gr> (hereinafter referred to as the “Web Platform”), which will enable them to remotely participate and vote to the AGM, will be collected and processed by the company “Hellenic Central Securities Depository S.A.” which the Company has contracted to organise its AGM.

The Company also informs its shareholders that, according to article 131, paragraph 2 of Law 4548/2018, remote voting is an open procedure and the exercise of the voting right as well as the vote preference by shareholders, may be disclosed to other General Meeting participants, if requested.

Furthermore, the Company informs its shareholders as well as other individuals participating in the video conference of the remote AGM, such as senior managers of the Company, members of the Board of Directors, auditors and other third parties, that in its capacity as data controller, in accordance with the Regulation (EU) 2016/679 (GDPR), Law 4624/2019 and the other provisions of the Greek and European legislation on the protection of personal data, the following personal data are directly collected and processed for the purpose of compliance of the Company with corporate legislation and its legal obligations regarding the proper conduct of its AGM:

- a) Identification data, such as name and surname, father’s name, identity card number or passport number or other equivalent document
- b) data regarding the capacity in which those individuals participate in the AGM
- c) e-mail address for the purpose of participating in the video conference
- d) audio and video data for the participation of individuals in the AGM
- e) basic personal data (mobile phone number, email address, name and surname, parents’ names, etc)
- f) data on share ownership
- g) unique characteristics (ID number)



h) entry codes and access to the Web Platform

i) quantity and preference of vote of each shareholder and representative on the agenda items, as well as the total result of the vote

j) data relating to the actual participation of individuals to the AGM, as recorded in the audio-visual archive of the video conference

Recipients of those data are Company staff responsible for the conduct of the AGM, the company “Hellenic Central Securities Depository S.A.” which the Company has contracted to organise the remotely-held AGM as well as any sub-contractors hired by the Hellenic Central Securities Depository S.A. (for instance Cisco Hellas SA which provides its WEBEX tools / services suite for video conference over its cloud service facilities which are located within the European Economic Area)

The personal data will be stored by the Company for the period of time required by law or according to the legal basis for the retention of the personal data depending on the purpose of their process, as well as for the necessary period of time required by the legal and/or regulatory framework in force or for the time required for the Company to exercise its claims and defend its rights and legal interests.

According to GDPR, personal data subjects have 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 the Company, as well as their source (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).

c) To request the restriction of processing concerning her/his personal data (right to restriction of processing).

d) To deny and/ or object to any further processing of her/his personal data retained by the Company (right to object).

e) To request for deletion of her/his personal data from Company records (right to be forgotten).

f) To request for the transfer of the data she/he has provided to the Company to another controller (right to data portability).

In order to exercise her/his rights, as per Section VII above, individuals may address the Company:



- In writing to:

AVAX SA

16 Amarousiou-Halandriou Street, 151 25, Marousi, Greece

c/o: Data Protection Officer

- Through email :

to the Company's Data Protection Officer at: mmagonaki.gdpr@avax.gr

The Company shall make its best effort 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 the Company, taking into account the complexity of the issue and the number of the pending requests. The Company 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.

The Company 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.

Individuals reserve the right to file a complaint with the Personal Data Protection Authority (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

AVAX SA, 16 Amarousiou-Halandriou Street, 151 25, Marousi, Greece

+30 210 6375000

II. Data Protection Officer

AVAX SA, 16 Amarousiou-Halandriou Street, 151 25, Marousi, Greece

Email: mmagonaki.gdpr@avax.gr