

Privacy Notice for Third Parties

HELLENiQ ENERGY Holdings S.A. (the "Company"), acting as data controller, in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679), Law 4624/2019 and the applicable legislation on the protection of personal data, informs the natural persons, other than shareholders, participating in the videoconference of the Annual Ordinary General Meeting (hereinafter the "Third Parties"), that it processes the following categories of their personal data:

- a) Identification data, such as full name, father's name, identity card number or other equivalent identification document;
- b) Data relating to the capacity under which such persons are entitled to participate in the General Meeting;
- c) Email address for the participation of the natural person in the videoconference;
- d) Image, audio and video data resulting from their participation in the General Meeting;
- e) Third Parties' access credentials to the online platform [AXIA e-Shareholders Meeting](#), through which they will be provided with the possibility to participate remotely in the Ordinary General Meeting.

Sources of Personal Data Collection

The personal data of Third Parties are collected directly from the data subjects themselves.

Purposes of Personal Data Processing

The Company collects and processes the personal data of Third Parties in order to enable their participation in General Meetings. If Third Parties do not provide the above personal data to the Company, they will not be able, as required by law, to participate in the General Meeting videoconference.

Legal Basis for Processing

The Company lawfully processes the personal data of Third Parties and, for each processing activity performed, at least one of the following legal bases applies:

- a. Processing is necessary for the purposes of the legitimate interests pursued by the Company, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subjects requiring protection of personal data (Article 6(1)(f) GDPR).
- b. Processing is necessary for compliance with a legal obligation to which the Company is subject (Article 6(1)(c) GDPR).

Recipients

Recipients of such data are the personnel of HELLENiQ ENERGY Holdings S.A. responsible for the management of the General Meeting, as well as the companies EURONEXT SECURITIES ATHENS S.A., EVENTORA and Pro Events Ltd, to which the organization of the remote General Meeting has been entrusted.

HELLENiQ ENERGY Holdings S.A. has ensured that the above service providers implement all necessary technical and organizational measures for the protection of personal data and that any processing of personal data by them is always carried out under the Company's instructions and control and is subject to the same level of protection as that provided under the relevant HELLENiQ ENERGY Group Policy.

Furthermore, it is noted that, in the context of conducting the Company's remote General Meetings, the required videoconference is carried out through the use of platforms supporting security services, ensuring that the link to the scheduled videoconference is adequately protected. In general, careful consideration of the terms of use and data protection provisions precedes the selection of any videoconferencing solution, in full compliance with the GDPR, Law 4624/2019 and, in general, the applicable legislation on the protection of personal data.

Data Retention Period

The Company retains the personal data of Third Parties until the purpose of the processing has been fulfilled or for the purposes of establishing, exercising or defending the Company's legal claims.

Information Security

The Company implements appropriate security measures to ensure the highest possible level of protection of all personal data and to prevent any loss, misuse or unauthorized access thereto. Access to personal data is restricted to persons who require such access exclusively for the performance of their duties.

Persons processing personal data on behalf of the Company act in accordance with the authorization granted to them by the Company and are bound by confidentiality obligations in relation to their activities.

The Company has established procedures for addressing any personal data security breaches, in order to be able to comply with its legal obligations in such cases.

Rights of Third Parties

Third Parties have a number of rights arising from the processing of their personal data by the Company. In particular:

a) Right of Access, Rectification and Erasure

Third Parties may, at any time, request information regarding the personal data maintained by the Company and request the amendment, correction, updating or deletion of such information, provided that such data have been collected directly by the Company.

Additional information may be requested for the processing of their request. However, where access to the personal data maintained by the Company is provided, such access shall be provided free of charge, unless the request is manifestly unfounded or excessive.

Where a request concerns the provision of a large number of copies of such information, Third Parties may be charged a reasonable administrative fee.

Where the Company has a lawful basis for refusing to comply with a request, it shall provide Third Parties with a clear explanation of the reasons for such refusal.

b) Right to Object

Third Parties have the right to object to the processing of their personal data, particularly where the processing is based on the Company's legitimate interests.

In such case, the Company must comply with the objection and cease the specific processing activity, unless it can demonstrate compelling legitimate grounds for continuing the processing which override the interests, rights and freedoms of the Third Parties, such as where processing is necessary for the establishment, exercise or defense of the Company's legal claims.

Any objection by Third Parties to processing activities related to the provision of benefits by the Company and the consequent cessation of such processing activities may result in the Company's inability to provide such benefits.

c) Right to Restriction of Processing

In certain circumstances, Third Parties have the right to restrict or eliminate the further use of their personal data.

In practice, this means that the Company may store their personal data but will not be able to further process them unless such processing is carried out with the consent of the Third Parties or is necessary either for the establishment, exercise or defence of the Company's legal claims, for the protection of the rights of another person, or for reasons of public interest.

d) Right to Data Portability

Third Parties have the right to transfer their personal data, which they have provided to the Company for processing, to other data controllers.

For the purpose of facilitating this right, the Company shall provide the data in a structured, commonly used and machine-readable format.

Alternatively, the data may be transmitted directly on their behalf.

e) Right to Lodge a Complaint with the Competent Supervisory Authority

Third Parties have the right to lodge a complaint with the competent supervisory authority, which in Greece is the Hellenic Data Protection Authority (HDPa).

Communication with the Hellenic Data Protection Authority may be made as follows:

- **Postal Address:** Hellenic Data Protection Authority, Offices: 1-3 Kifisias Av., 115 23 Athens, Greece
- **Email:** complaints@dpa.gr
- **In-person submission:** At the Authority's offices, 1st Floor, Registry Office, between 09:00 and 13:00.

Contact

For any questions regarding this Notice, please contact the Company by sending an email to DPO@helleniq.gr.

The Company, on the basis of its applicable data protection policy and within the framework of the applicable legislative and regulatory requirements, may revise or amend this Notice from time to time. The updated version will always be available on the following website:

[Personal Data Protection - HELLENiQ ENERGY](#)