

# Information to the shareholders who will participate in the Ordinary General Meeting of 10<sup>th</sup> July 2024 of the company

## "INTRAKAT SOCIETE ANONYME TECHNICAL AND ENERGY PROJECTS"

# General Commercial Registry (GEMI) no: 000408501000 On the processing of their personal data

The company "INTRAKAT SOCIETE ANONYME TECHNICAL AND ENERGY PROJECTS", having its registered office at the 19<sup>th</sup> km of Markopoulo Avenue, 19002 Paiania, Attica (hereinafter the "Company"), is the Data Controller of the shareholders' personal data collected during their participation in the Ordinary General Meeting of the Company on 10<sup>th</sup> July 2024. The Company enables shareholders, if they wish so, to participate in the above mentioned General Meeting as well as in any adjournment or reconvention thereof, via teleconference, pursuant to article 125 of Law 4548/2018. This notice provides information on the type of the shareholders' personal data the Company collects, the manner and the purposes of data processing, the third parties with whom the Company shares these data, and the related rights of the shareholders.

# Categories of personal data subject to processing

The personal data of the shareholders which is collected and processed by the Company 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.

In order to hold a virtual General Meeting, the Company uses Third-Party electronic platforms, namely ATHEX Group's e-platform for virtual General Meetings of listed companies in real time through teleconferencing, via the web page <a href="https://axia.athexgroup.gr">https://axia.athexgroup.gr</a> as well as the video conferencing application Zoom meetings, used by the foregoing Group.

Shareholders or their proxies that wish to create an account in the electronic platform above are required to provide a valid electronic email account and a mobile phone number. Furthermore, access to the platform requires a successful 2-factor authentication of the shareholder performed by the "Hellenic Central Securities Depository S.A." based on the data registered in the Dematerialized Securities System. It is noted that the Company is not involved in the aforementioned identification processing, given that the processing of the shareholders' personal data as regards the Company starts from the moment the video conference application via the relevant link is activated.

More specifically, the Company processes the following personal data:

- Identification data, such as full name, ID Card or equivalent document.
- Data regarding the capacity on the basis of which the persons are entitled to participate in the General Meeting and the relevant supporting documents.
- Electronic address (e-mail) for the purpose of the natural person's participation in the teleconference.
- Image and audio data in case the participant in the General Meeting takes the floor during its duration.
- Number and class of shares held by the shareholder.
- Portion Number Code in the Dematerialized Securities System (DSS)
- Data concerning the Shareholder's participation and voting rights in the General Assembly, including the data required to participate in an electronic video conference (eg access codes).



In case the shareholder participates in the General Meeting by proxy, the Company will process the data entered in the form of appointment of proxy, i.e. the name and surname, home address, ID Card number, email address, and the mobile phone number of the proxy. In addition, the Company will collect any information the shareholder provides regarding any possible conflict of interest of their proxy.

#### Sources of collection of personal data

The above personal data is collected either directly by the shareholders for the performance of tasks relating to them or by third persons authorized by the shareholders, or by the "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 the Company's shareholder structure, any transactions on the shares and are provided to the Company through electronic records, according to the current provisions of the legislation in force and the Regulation of the Dematerialized Securities System (DSS).

# Purposes of data processing and legal basis

The Company processes personal data in order to prepare, conduct and follow up the General Meeting, and in this regard to fulfil its duties towards the shareholders and their proxies, in particular to:

- process the registration to and participation of shareholders and proxies in the General Meeting (e.g., to check the identity, entitlement to participate, send out invitations and access data, prepare the attendance list and keep it available for inspection, send out voting rights cards); and
- enable shareholders and proxies to exercise their rights at the General Meeting.

The processing of the personal data as described above is carried out in order for the Company to comply with its legal obligations. The legal basis for these processing operations is Art. 6 (1)(c) General Data Protection Regulation (GDPR) in conjunction with the Company's obligations under stock corporation law, as arising under Law 4548/2018.

The legal basis of the audiovisual recording of the General Meeting is the legitimate interest of the Company to document the relevant deliberations and resolutions in the General Meeting Minutes fully and accurately and to offer the online service as a service for shareholders and their proxies in order for them to exercise their shareholder rights in a user-friendly manner (article 6 (1)(f) GDPR).

# **Recipients of personal data**

The aforementioned personal data of the shareholders and their proxies, as entered in the General Meeting Minutes, are submitted to the competent General Commercial Registry (GEMI) office, according to the provisions of the applicable laws. The Company may also disclose or transmit personal data to other recipients who are authorised to process the forementioned data within the scope of their statutory tasks, duties and powers (indicatively, Hellenic Capital Market Commission, Athens Stock Exchange, Hellenic Central Security Depository etc.). In addition, copies of the General Meeting Minutes are issued to the Company's shareholders upon request.

The Company may also transmit or disclose personal data to natural persons and legal entities to which the Company assigns the execution of certain tasks on its behalf (maintenance of the share register, IT service providers, lawyers, law firms, accountants, chartered accountants or audit firms). The Company carefully selects the service providers and they work exclusively in accordance with the Company's instructions, which are ensured through contractual clauses and technical and organisational measures.

#### Transfer of personal data outside EU/EEA

Personal data will generally be processed in countries that belong to the European Union (EU) and the European Economic Area (EEA). In case that transfer of personal data to third countries is required,



such transfer and in general processing shall be subject to compliance with the GDPR, in order to ensure that the level of protection guaranteed by GDPR is not undermined and that sufficient safeguards are provided for the protection of personal data.

# What is the retention period of personal data?

The personal data, as entered in the General Meeting Minutes shall be retained for a time period equal to the term of the Company. The legal basis for such retention is the Company's legitimate interest in the preservation of its business continuity, the safeguarding of its position and interests, and the respect of corporate transparency. The audiovisual material from the recording of the General Meeting is kept for three (3) months for the foregoing purposes. Beyond this, the Company only stores personal data in individual cases if this is necessary in connection with claims made for or against the Company.

## What are the shareholders' and their proxies' rights?

Every shareholder/proxy has and can exercise the following rights:

- the right of access to their personal data and to information related to the data processing;
- the right of rectification inaccurate personal data and of completion incomplete personal data;
- the right to erasure ("right to be forgotten");
- the right to restriction of processing in the cases expressly provided by law;
- the right to data portability, i.e. the right to receive the data concerning them in a structured, commonly used and machine-readable format (e.g. USB) or to transmit the same to another controller;
- the right to object to the processing of their personal data based on the Company's legitimate interest as per the above;
- the right to withdraw their consent.

In case a shareholder wishes to exercise any one of the above rights, they have to submit a written request to the Company, to which the Company undertakes to reply within one (1) month from receipt of. The above time limit may be extended by two (2) further months, depending on the complexity of the request, and the number of requests in general.

In case a shareholder does not wish to be recorded by audiovisual means when they speak during the General Meeting, they are kindly requested, before they take the floor, to inform the administrators via the e-platform in order for the recording to pause for the time of their speech. However, the content of their point of order will be included in the corresponding Minutes according to the applicable legal provisions in force.

#### **Contact**

For any question, clarification or request with regard to the protection of their personal data in view of their participation in the General Meeting, the shareholders may contact the Company's Data Protection Officer at the email address <a href="mailto:dpo@intrakat.com">dpo@intrakat.com</a>.

In any case, the shareholders have the right to submit a complaint to the Hellenic Data Protection Authority (<a href="www.dpa.gr">www.dpa.gr</a>) using the following contact details: <a href="complaints@dpa.gr">complaints@dpa.gr</a>, 1-3, Kifissias Avenue, 115 23 Athens, tel. +30 210 6475600.