

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR THE SHAREHOLDERS OF “LOULIS MILLS S.A.”**

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

The Societe Anonyme under the name “LOULIS MILLS S.A.” (hereinafter referred to as “The Company”), in its capacity as data controller, in accordance with the Regulation of the European Parliament and Council 2016/679 (GDPR), L. 4624/2019 and the other provisions on the protection of personal data, informs the natural person in her/his capacity as shareholder of “The Company”, former shareholders and/or persons with a voting right and/or their representatives, as well as others exercising the voting right by representing legal entities (hereinafter referred to as “Shareholder”), that “The Company” itself as an issuer or third parties acting on its instructions and on its behalf, will process personal data relating to her/him, in the context of her/his capacity as shareholder of “The Company”, in the way described as below.

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

- 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

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

“The Company” collects the aforementioned personal data either directly from the Shareholder or from third persons authorized by the Shareholder, or from the company “Hellenic Central Securities Depository S.A.”.

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

Personal data collected in the way described above, in accordance with the applicable legal and regulatory framework, are processed for the following purposes:

- a) To identify the Shareholder.
- b) To communicate with the Shareholder.
- c) To verify the correctness and legality of exercising Shareholders’ rights according to the relative legislation and regulatory framework (i.e. participation in the General Meeting, exercise of the voting right in the General Meeting, drawing up a shareholders’ list, keeping minutes of the General Meeting, participation in corporate actions, etc.).
- d) To fulfill “The Company’s” obligations towards its shareholders (i.e. dividend distribution).
- e) To fulfill and defend “The Company’s” legal rights and interests in case of possible legal claims of the Company.
- f) To keep an archive of the “The Company’s” shareholders.

It is noted that the aforementioned purposes of personal data processing may be based on more than one legal bases. Specifically, the processing is necessary for compliance with legal obligation to which “The Company” is subject (mainly points a, b, c, and d), for the purposes of the legitimate interests pursued by “The Company” (mainly points e, g and f) and in order

to fulfill its obligations to its shareholders (mainly points a, b, c, and d).

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

a) "The Company's" employees who are responsible for Shareholders' identification and for reviewing the lawful exercise of their rights.

b) Natural persons and legal entities, to which "The Company" 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.

c) The company "Hellenic Central Securities Depository S.A."

d) Supervisory, audit, independent, judicial, 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, Anti-Money Laundering, Counter-Terrorist Financing and Source of Funds Investigation Authority).

e) Other shareholders, as appropriate, in accordance with the law.

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

"The Company" does not currently transfer any personal data to any third country or international organization.

In case the transfer of any Shareholders' personal data to countries outside the E.E.A. (third countries) or in international organizations is required for one of the following reasons, this is done to the extent that the European Commission has issued an implementing act to the effect that the third country, a territory or one or more specified sectors within that third country ensure an adequate level of protection of personal data or if appropriate guarantees have been provided from the recipient, according to the European Union and/or Greek legislation. Shareholders' personal data transfer to third countries, outside the E.E.A., may take place under the following circumstances:

a) when the Shareholder has been specifically informed and has given her/his expressed consent to "The Company", provided also that the other conditions laid down in the legislative framework are met,

b) where the transfer is necessary for the execution of contractual obligations,

c) where the transfer is necessary for the establishment, exercise or support of legal claims or the defense of "The Company's" legal rights,

d) where the transfer is necessary under a statutory provision or a transnational convention or an international convention, or

e) for the purposes of "The Company'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 "d" or "e" above, "The Company" 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 by "The Company" for the period of time required by law or according to the legal basis for the retention of the personal data relevant to their processing purpose, 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.

## **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 “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). This is at the same time a Shareholder’s obligation.
- 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 “The Company’s” 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).

“The Company” 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 “The Company’s” Shareholder or as person having voting right, as well as in case they are necessary for the establishment, exercise or defense of “The Company’s” rights, the compliance of “The Company” with its legal obligations or the fulfillment of “The Company’s” obligations towards its shareholders.

“The Company” 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 Company’s” shareholders (pursuant to the aforementioned Section III. f), as well as in any case their processing or retention is necessary for the establishment, the exercise and the defense of “The Company’s” legal rights or the fulfillment of “The Company’s” obligations.

The exercise of the right to data portability (point f above) does not imply the deletion of data from “The Company’s” records.

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

(a) By physical mail to:

“LOULIS MILLS S.A.”

1 Spetson Street, Keratsini Attiki, PC 17455, Greece

Attn. of the Shareholders Services Supervisor or

(b) By e-mail at the e-mail address: [privacy@loulisgroup.com](mailto:privacy@loulisgroup.com)

“The Company” 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 “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.

If “The Company” does not take action in relation to Shareholder’s request, it shall inform the Shareholder without delay and 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 and/or are repeated and/or excessive, a reasonable fee may be imposed after the Shareholder has been informed accordingly, or “The Company” may refuse to

respond to such requests.

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

"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.

#### **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.

### **SUPPLEMENTARY INFORMATION ON THE PROCESSING OF THE PERSONAL DATA OF SHAREHOLDERS OF "LOULIS MILLS S.A." AND OTHER PARTICIPANTS IN THE REMOTE ANNUAL ORDINARY GENERAL MEETING OF THE COMPANY**

#### **A. UPDATE OF THE UNDERLYING PERSONAL DATA**

The Societe Anonyme under the name ""LOULIS MILLS S.A." (hereinafter referred to as "The Company"), in addition to the information on the processing of personal data of shareholders, notifies the shareholders that for reasons of their participation in the remote annual Ordinary General Meeting of The Company" (hereinafter "General Meeting"), will be collected and processed by the executor "Hellenic Central Securities Depository SA", which has been assigned by "The Company" the organization of the remote General Meeting, the shareholders' passwords on the online platform [www.athexgroup.gr/AXIAeShareholdersMeeting](http://www.athexgroup.gr/AXIAeShareholdersMeeting), which will provide the shareholders with the opportunity to participate and vote remotely in the General Meeting (hereinafter referred to as "Internet Platform").

Also, "The Company" informs the shareholders that according to par. 2 of article 131 of Law 4548/2018, the remote voting is open and the exercise of the voting right by each shareholder as well as the content of the vote, if requested, may be disclosed to the other participating shareholders in the General Meeting.

In addition, "The Company" informs, as Data Processor, according to the Regulation (EC) 2016/679 of the European Parliament and the Council, the Law 4624/2019 and the other provisions on the protection of personal data, the shareholders and also the natural persons, who will participate in the teleconference of the remote General Meeting, such as the Company's executives, Board Members, Auditors and other third parties, that it processes the following data which are collected directly from the underlying persons for the purposes of legal interests pursued by "The Company" in relation to the above processing:

- (a) Identification data, such as name, patronymic, ID number or other equivalent document
  - (b) Data on the capacity under which such persons are entitled to participate in the General Meeting
  - (c) An email address for the purposes of participation of the natural person in the teleconference
  - (d) Vision and audio data from the participation of the natural person in the General Meeting.
- Recipients of these data are the executives responsible for the administration of the General Meeting of "The Company", the Societe Anonyme "Hellenic Central Securities Depository SA",

which has been assigned by “The Company”, as the executor, the organization of the remote General Meeting as well as any sub-executives of the Societe Anonyme "Hellenic Central Securities Depository SA" [such as e.g. Cisco Hellas S.A. which provides the WEBEX tool / services team that enables video conferencing via cloud services, which is maintained within the European Economic Area].

The personal data are kept by “The Company” for the period of time required by law or in accordance with the legal basis for the retention of data, based on the purpose for which their processing serves, as well as for the period of time required by the current legal and / or regulatory framework or for the exercise of claims or the defense of legal interests of “The Company”.

According to the General Regulation for Data Protection, the underlying parties have the following rights, which can be exercised on a case by case basis:

- (a) To know what personal data concerning these persons is being kept and processed by the Company, as well as their origination (right of access)
- (b) Request their correction and / or completion, so that these data are complete and accurate, providing any necessary documentation from which the need for completion or correction arises (right of correction)
- (c) Request a restriction on the processing of their data (right of restriction)
- (d) To refuse and / or oppose any further processing of their personal data held by “The Company” (right of objection)
- (e) To request the deletion of their data from the files of “The Company” (right to be forgotten)
- (f) To request from “The Company” to transfer the data, that have been provided, to any other controller (right to data portability).

For the exercise of the above rights, the natural person can address “The Company”:

(a) By physical mail to:

"LOULIS MILLS S.A."

1 Spetson Street, Keratsini Attiki, PC 17455, Greece

Attn. of the Shareholders Services Supervisor or

(b) By e-mail at the e-mail address: [privacy@loulisgroup.com](mailto:privacy@loulisgroup.com)

“The Company” will make every effort to respond to the natural person within a period of thirty (30) days from the submission of each request, which may be extended for sixty (60) additional days, if required at the discretion of “The Company”, taking into account the complexity of the request and the number of requests. “The Company” will inform the natural person in case of any extension of the deadline of thirty (30) days within thirty (30) days from receipt of the request and will also inform this person of the reasons for the extension.

“The Company” implements an information security management system to ensure confidentiality, the security of the processing of personal data and their protection from accidental or unlawful destruction, loss, alteration, prohibited dissemination or access, as well as from any other form of unfair processing. The natural person has the right to file a complaint to 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 the natural persons, against the processing of data concerning these persons, if the persons consider that their rights are being violated in any way, as well as the right to appeal.