INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE BOARD OF DIRECTORS' MEMBERS OF "SIDMA STEEL SA" PURSUANT TO REGULATION (EU) 2016/679 AND THE RELEVANT GREEK AND EUROPEAN UNION LEGISLATION

With the present document we would like to inform you on the processing of your personal data by the company "SIDEREMPROMPORIKI MAKEDONIAS SIDMA METALLOURGIKI ANONYMI ETAIRIA (hereinafter referred to as the "company") having regard to the General Data Protection Regulation (EU) 2016/679 and the provisions of the relevant Greek and EU legislation on the protection of personal data.

The term "you" for the purposes of the present notification refers to members or nominees of the Board of Directors of the company as well as their spouses/partners and their relatives up to the 2nd degree or any financially dependent persons.

1. Which of your personal data can be collected and processed by the company and from which source?

The personal data that may be collected and processed by the company, belong mainly to the following categories and it is expressly stated that they may not concern you as a whole:

1. 1. For members or nominees of the Board of Directors of the company:

a) Your identification data: full name, father's name, mother's name, date of birth, ID card/passport, TIN, Social Security number, etc.

b) Your contact details: postal and e-mail address, your landline and mobile phone numbers, etc.

c) Data on your marital status and financially dependent members of your family.

(d) Profession and details of your professional qualifications, such as, but not limited to, curriculum vitae, qualifications, professional licences and certifications, etc.

e) Information arising from any employment/collaboration/client relationship with an affiliated company or Group Company/Companies.

f) Kinship relationships, intellectual relationship with employees of the company or an affiliated company.

g) Criminal record data.

h) Data on the financial status (certificates of non-bankruptcy, non-suspension of payments, etc.).

i) Professional activity data (participations in boards/committees, in legal entities outside the Group).

j) Any other data resulting from documents and supporting documents in general that you provide and the questionnaire that you will complete throughout your relationship as a Board member or during the evaluation stage of your candidature as a Board member.

k) Data arising from your relationship as a Board member such as, but not limited to, communications, correspondence, etc.

The above data is collected either directly from you, or from third parties acting on your behalf (e.g. representatives, proxies, etc.) or from the company.

Also, in case you provide us with personal data of third parties, you should have duly informed them beforehand by reference to the present notice and obtained their consent where this may be required.

2. What is the purpose that the company collects your personal data and why does it process them?

The company processes your personal data for:

(a) complying with its legal obligations;

b) serving your relationship as a member of the Board of Directors;

(c) communicating with you;

c) complying of the Group Companies with the applicable regulatory framework;

d) evaluating of your nominee for appointment as a member of the Board of Directors of the company or as a member of the Committee;

e) fulfilling the company's obligation towards you (e.g. payment of remuneration, insurance).

3. Who are the recipients of your data?

Your data can be accessed by the Board of Directors and authorised employees, if necessary.

The transmission of data to other recipients outside the company is only permissible:

(a) when it is deemed absolutely necessary to serve your relationship as a Board member;

(b) to enable the company to meet its statutory obligations; or

(c) for reasons of overriding legitimate interest of the company or a third party; or

(d) with your consent.

In such a case, your personal data may for example be disclosed to:

1. Entities and persons providing accounting and payroll services, entities providing advisory and/or auditing services, lawyers, law firms, as well as other entities processing data in the context of fulfilling the processing purposes mentioned above (2)

2. Supervisory, auditing, independent, judicial, prosecutorial, public and/or other authorities or bodies within the framework of their competences, duties and powers (e.g. General Electronic Commercial Registry.[GEMI] Tax Office, Insurance Funds).

3. How long does the company retain your data and why?

The personal data of the members of the Board of Directors and their spouses, relatives up to the second degree or any financially dependent persons shall be kept for as long as the membership of the Board of Directors of the Company is maintained.

In the event of termination of the mandate of a member of the Board of Directors for any reason whatsoever, the data of the said member and his/her spouses, relatives up to the second degree or any dependent persons shall be kept until the completion of the statutory period of general limitation of claims, i.e. for a period of up to twenty (20) years from the termination of the membership of the Board of Directors of the company.

In case until the expiration of twenty (20) years, legal actions are in progress with the company concerning directly or indirectly, the members of the Board of Directors or their spouses, relatives and dependents as mentioned above, this period of keeping personal data shall be extended until the issuance of an irrevocable court decision.

The personal data of the nominees of the Board of Directors, in case they are not finally appointed as members of the Board of Directors, as well as their spouses, relatives up to the second degree or any financially dependent persons, shall be kept for a period of one year from the rejection of their nominee.

4. What are your rights and how can you exercise them?

You have the following rights to the extent that they are applicable in the present case:

a) To have access to your personal data processed by the company (right of access).

b) To request the correction and/or completion of any information about you that is inaccurate or incomplete (right of rectification), providing any necessary document showing the need for correction or completion.

c) To request the restriction of the processing of your data (right of restriction).

d) To object to any further processing of your personal data held by us (right to object).

e) To request the deletion of your personal data from our records (right to be forgotten).

(f) To withdraw any consent. Withdrawal of consent is specified as not affecting the lawfulness of the processing based on consent prior to its withdrawal.

g) File a complaint with the Hellenic Data Protection Authority (www.dpa.gr - My rights - File a complaint), if you consider that your rights are infringed in any way.

5. Identity of Data Controllers - Contact details for issues relating to the processing of personal data

You can contact us on matters relating to the processing of your personal data at

SIDIREMPORIKI MAKEDONIAS SIDMA METALLOURGIKI ANONYMI ETAIRIA

MEGARIDOS 188 P.C. 193 00 ASPROPYRGOS, ATTICA

Under the responsibility of the GDPR Unit

or by sending an email to privacy@sidma.gr with the subject "Personal Data" and/or by calling at: 2103498220.

6. How does the company protect your rights?

The company implements the most appropriate organisational and technical measures for the security of your data, ensuring their confidentiality, processing and protection from accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access and any other form of unlawful processing. The present notice replaces any other previous general information you may have received on the processing of your personal data.