



**Information on the processing of personal data of shareholders and shareholder-related persons of SIDMA STEEL SA, pursuant to Regulation (EU) 2016/679 and the relevant Greek and European Union legislation**

**SIDIREMPORIKI MAKEDONIAS SIDMA METALLOURGIKI ANONYMI ETAIRIA** (hereinafter referred to as "SIDMA Steel") located in Aspropyrgos, 188 Megaridos Avenue, P.C. 19300, Attica, with General Electronic Commercial Registry (G.E.MI.) Number. 361801000, informs you, in your capacity as shareholders, former shareholders of SIDMA Steel and/or as voting rights holders, and/or as representatives of the former (namely shareholders and/or voting rights holders) in compliance with Regulation (EU) 2016/679 and the provisions of the relevant Greek and EU legislation on the protection of personal data, in its capacity as data controller, that it processes your personal data according to the following:

**1. Which of your personal data does SIDMA Steel collect and where does it collect them from**

The personal data collected by SIDMA Steel are indicatively the following and may not concern you as a whole:

- α) Your identification data: full name, father's name-mother's name, ID number or passport number, TIN, Social Security number, nationality, profession, etc.
- b) Your contact details: postal and/or e-mail address, telephone number (landline) and/or mobile phone number, etc.
- (c) Number and class of shares.
- d) In the case of voting rights holders and representatives, data on your voting status and the relevant supporting documents are also collected.

The above data is collected either directly by you or by third parties authorised by you.

**2. Why does SIDMA Steel collect your data and how it processes them**

The aforementioned personal data are processed in order for the company to comply with the obligations imposed by the respective applicable legal, regulatory and supervisory framework, as well as the decisions of any public authorities or courts (see in particular the following purposes under e, a, c, d, g), the advocacy of the rights and fulfilment of the legitimate interests of SIDMA Steel (see in particular the purposes under b, g, h below) and to serve your relationship as a shareholder (see in particular the purposes under a, b, c, d, f, g below) for the purposes below (it is expressly stated that processing for the purposes below may be based on more than one legal basis):

- α) Your identification.
- b) Communicating with you.
- c) The verification of the possibility and legality of the exercise of your rights as shareholders of SIDMA Steel and/or voting rights in accordance with the applicable legislation and regulatory framework on public limited companies and/or companies with shares or securities listed for trading on a regulated or organised market (participation in general meetings of SIDMA Steel and exercise of voting rights in such meetings, preparation of shareholder lists, keeping minutes of meetings and decisions of the general meeting, etc.).
- d) The fulfilment of its obligations towards you as its shareholders and/or voting rights holders (e.g. dividend payment)
- e) The compliance with its legal obligations.
- f) The maintenance of historical records of its shareholders.
- g) Advocating its legal rights and interests.

### **3. Who are the recipients of your data**

The recipients of your data may be the following persons:

- a) The management of SIDMA Steel and/or its employees, who are responsible for your identification and the control of the legality of the exercise of your rights.
- b) Lawyers, law firms, judicial bailiffs, experts, expert witnesses, in any judicial action (including pre-trial or investigative actions or criminal prosecutions).
- c) Natural persons, and data processing companies for the purposes of data control and updating, as well as providers of IT application services and maintenance, if confidentiality is respected in all cases.
- d) The company ""Greek Central Securities Depository SA".
- e) Supervisory, independent, judicial, prosecutorial, public and/or other authorities/agencies within the scope of their competences (e.g. the Hellenic Capital Market Commission).
- f) Other shareholders, shareholders with voting rights, representatives and agents of the general meetings of SIDMA Steel.

### **4. Can SIDMA Steel transmit your data to third countries (outside the EEA)**

SIDMA Steel may transfer your personal data to third countries, outside the EEA, in the following cases:

- a) provided that a European Commission implementing act has been adopted on an adequate level of protection of personal data in the particular country, territory or one or more specific sectors in that country; or

b) appropriate safeguards have been provided for the processing by the recipient, based on Union and/or national law.

If none of the above conditions apply, a transfer may take place provided that the derogations referred to in the Union and/or national law are met. Indicatively some of these derogations are the following:

- a) if you have provided SIDMA Steel with your express consent; or
- (b) if SIDMA Steel is obliged to do so by a provision of law or an intergovernmental agreement or a court decision; or
- c) in the context of SIDMA Steel compliance with the rules of automatic exchange of information in the tax sector, as they result from the international obligations of Greece

## **5. For how long SIDMA Steel shall keep your data**

Personal data shall be kept for the time necessary for the fulfilment of the purpose served by their processing, otherwise for the period of time required by the applicable legal and/or regulatory framework or the exercise of claims and the advocacy of rights and legitimate interests the company.

## **6. What rights you have to protect your data**

You have the following rights:

- a) To know the categories of your personal data held and processed by SIDMA Steel, their origin, the purposes of their processing, the categories of their recipients, the time of their retention, as well as your relevant rights (right of access).
- b) To request the correction and/or completion of your personal data in order to make them complete and accurate (right of rectification), by 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).

SIDMA Steel has in any case the right to refuse to comply with your request for restriction of processing or deletion of your personal data if the processing or the keeping thereof is necessary for you to continue to be shareholders of SIDMA Steel, for the exercise of your rights as shareholders and/or voting rights, as well as for the establishment, exercise or support of its legal rights, to comply with its legal obligations.

- f) To file a complaint with the Hellenic Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)), in case you suppose that your rights have been infringed upon in any way.

## **7. How you can exercise your rights**

To exercise the rights under the previous section, you may address in writing to the Company's Address to the Shareholders' Service Department, or by e-mail to [ir@sidma.gr](mailto:ir@sidma.gr).

SIDMA Steel shall make every effort to respond to your request within thirty (30) days of receiving it. This time limit may be extended for sixty (60) additional days if deemed necessary in its sole discretion, taking into account the complexity of the request and the number of requests. SIDMA Steel shall inform you in case of any extension of the deadline within thirty (30) days of receiving the request.

In case the requests are manifestly unfounded, excessive, or repetitive, SIDMA Steel may refuse to respond to your request(s).

## **8. How does SIDMA Steel protect your rights**

SIDMA Steel applies appropriate organizational and technical measures for securing your data, by ensuring confidentiality of their processing and their protection from accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access and any other form of unlawful processing.