

**Information to the shareholders of the company "R.E.D.S. REAL ESTATE DEVELOPMENT & SERVICES SOCIETE ANONYME ", as per the protection of personal data in the framework of the European General Data Protection Regulation 2016/679 (GKPD), Law 4624/2019 and the relatable legislation, as in force, during the Extraordinary General Meeting on 04/01/2021.**

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The company "R.E.D.S. REAL ESTATE DEVELOPMENT & SERVICES SOCIETE ANONYME "and with the distinctive title" R.E.D.S SA (hereinafter "REDS"), based at 25 Ermou, Kifissia (Bus. Reg. No. 224701000, Tax Identification Number 094007180, Tax Office of COMMERCIAL COMPANY ATHENS), with the following information, aims to provide you with information, in its capacity as the Controller in accordance with Regulation (EU) 2016/679 (hereinafter the "Regulation"), Law 4624/2019 and the other provisions of the relatable legislation, regarding the way of processing your personal data and rights as well as the results of the above as Data Subjects.

The recipients of this information, as it will be analyzed below, are the shareholders of REDS, those who in any way have the right to vote and / or exercise rights over REDS shares, the proxies , representatives of the above and / or in general third parties persons related to the above, in the context of the Extraordinary General Meeting of REDS shareholders on the 4<sup>th</sup> of January 2021, which will take place exclusively by Distance in Real Time via Teleconference, as well as in any resumed or suspended or interrupted meeting.

**1. What kind of data is processed by REDS and on which legal basis?**

REDS processes your personal data in accordance with the GDPR (General Data Protection Regulation), Law 4624/2019, the Rules of Operation of the Dematerialized Securities System (DSS Regulation) and any other relevant legislation, for the lawful conduct of the Extraordinary General Meeting, and for the purposes of the above applicable regulatory framework.

More specifically, the personal data collected by REDS solely for the purpose of serving the shareholder relationship are the following:

- i) Identification data of the Subject: name, patronymic, mother's name, identity card or passport, VAT number, citizenship, profession, etc.
- ii) With respect to representatives of legal entities, proxies appointed to represent them at the General Meeting and to exercise their voting rights, and to third parties generally associated with the above, data on the proof of representation and in general power of

attorney documents that legitimize the above persons for the participation in the General Meeting are also collected.

- iii) Number and category of shares / voting rights / stock options, SAT share number, securities account number.
- iv) Contact details: postal and / or e-mail address, landline and / or mobile phone, fax number etc.
- v) Data arising from the shareholding relationship, i.e. indicative percentage and type of participation, trading activity on shares.
- vi) Data that may arise in the context of any participation in the general meeting remotely by electronic means (codes, e-mail address, profile, etc.).

The legal basis for the processing of the above personal data, in order to fulfill the above purposes, is based on art. 6 (1c) of the GDPR P in combination with Law 4624/2019, in order for REDS to comply with the regulatory framework on public companies (Law 4548/2018), the DSS Regulation (for listed companies) as well as the decisions of the authorities (public, supervisory, independent, prosecutorial, etc.) or courts (regular or arbitral), and in general for the compliance of the company as a Controller in its legal obligations to any regulatory framework entails its legal operation (e.g. tax, insurance legislation).

Also, the legal basis for the processing of your above personal data may be based on art. 6 (1a) of the GDPR, provided that such personal data have been collected with your consent.

In addition to the above, the processing of the personal data mentioned herein, may also serve purposes, such as keeping a historical record of REDS shareholders, exercising and supporting any legal claims, conducting analyzes and statistics, as well as promoting the corporate image and the company's activities.

In any case, if there is a need for further processing of your personal data, for purposes that go beyond the above, we will contact you in advance.

## **2. Is REDS the only one that has access to personal data or third parties persons or legal entities have access, as well?**

In the context of the shareholders' service and within REDS, only those who are absolutely necessary to have access to the personal data of the shareholders in order to perform their duties with respect to them, have access to such personal data.

In the event that REDS cooperates with third party companies (service providers, dealers, etc.) in the context of a General Meeting, these companies will have access to your personal data, exclusively as execution assistants - performing the processing, as defined in legislation (art. 28 GDPR), while in this case, REDS, as the Controller, is by law the sole responsible towards the shareholders for the processing of their personal data.

Moreover, your personal data may be transferred to the competent Authorities and Services, in the context of REDS compliance with the applicable legal framework (eg General Trade Register, Hellenic Capital Market Commission, Athens Stock Exchange) where the aforementioned recipient of the personal data in that case, process the shareholders' personal data at their own risk, in accordance with their statutory obligations.

In particular, in the context of the Extraordinary General Meeting of 04/01/2021 (as well as any resumed or postponed or adjournment of the meeting), as it will take place exclusively by Distance in Real Time via Teleconference, pursuant to articles 120 par. 3 and 125 of Law 4548/2018, and art. 16.3 of the Company's Articles of Association, we receive services from the societe anomyme "Greek Central Securities Depository SA" (ATHEXCSD), where the above company in the context of providing its services for the proper conduct of the General Meeting, will act as the Processor, in accordance with the General Data Protection Regulation (GDPR) and the legislation in force on the protection of personal data, as it will process on behalf of REDS (as the Controller) personal data of shareholders / proxies / third parties, in executing the above services.

### **3. For how long does REDS keep the collected personal data?**

The personal data processed by REDS must be kept for the entire period necessary to fulfill the purpose of the processing. At the end of this period, the data are deleted unless otherwise specified by the applicable legal and regulatory framework or as long as they are required to defend the rights of the Company before a Court or other competent authority.

REDS does not process the above data for other purposes, and it processes only those personal data that are absolutely necessary for the purpose of each process, which always takes place legally and in accordance with the core and terms of the GDPR, of Law 4624/2019 and relatable legislation, as in force.

### **4. What rights do you have for your data protection, as data subjects?**

REDS in order to comply with these data in accordance with the provisions of the General Data Protection Regulation 2016/679 and Law 4624/2019, takes all necessary technical and organizational measures for the safe process of these data and ensures the appropriate level data security against risks e.g. destruction, loss, alteration, unreasonable disclosure / access, unauthorized read-copy, modification

or deletion of personal data so as to ensure the confidentiality, integrity, security, availability and reliability of the process systems, on a continuous base.

As data subjects you have, under certain conditions, the right to access the recorded data that concern you, as well as the right to receive the above data that concern you, in a structured, commonly used and machine-readable format (portability right). The right to amend your data if they are inaccurate, to delete the personal data concerning you, unless their retention is required by law, the right to restrict processing, the right to object at any time to the process of personal data concerning you, including process intended for profiling, and in general all the rights provided for in Chapter III of the GDPR.

For the exercise of your above rights, as well as for any other information or question regarding the process of your personal data, you can send an email to [dporeds@etae.com](mailto:dporeds@etae.com).

In case you exercise any of the above rights, REDS will take all possible measures to satisfy your request within thirty (30) days of receipt, at which time you will be informed of its progress. It is mentioned that this timeframe can be extended to two (2) additional months, taking into account the complexity of your request, as well as the number of requests in general. These rights are exercised at no cost for you, unless they are repeated frequently and due to their level, incur administrative costs for us, in which case you will be charged the relevant costs.

Furthermore, REDS will notify you in case of any breach of your personal data, if such a breach may jeopardize your rights and freedoms and provided that it is not included in the exceptions, expressly foreseen in the legal framework.

You also have the right to appeal to the Hellenic Data Protection Authority (HDP) if you believe that your rights regarding the process of your personal data, are being violated.

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