

Data Protection Policy

DATA PROTECTION POLICY

The protection of natural persons in relation to the processing of personal data is a fundamental right. Article 8 para. 1 of the Charter of Fundamental Rights of the European Union (the “**Charter**”) and article 16 para. 1 of the Treaty on the Functioning of the European Union (TFEU) provide that everyone has the right to the protection of personal data concerning him/her.

Furthermore, under General Data Protection Regulation (GDPR) No. 2016/679 of the European Parliament and the Council which came into effect on 25.05.2018, a stricter framework has been introduced for the protection of individuals with regard to the processing of their personal data and for the free movement of such data (the “**General Regulation**”).

The protection of natural persons with regard to the processing of personal data is of the utmost importance for Mytilineos S.A. (the “**Company**”); consequently, the Company collects and processes personal data strictly in conformance with the General Regulation and the applicable legislation in general and to the extent necessary in connection with some aspect of labor relationships and the business of the Company. The Company limits the access to such data to authorized persons only, and takes enhanced data security measures to secure data against -among others- loss, mishandling, unauthorized access, alteration or disclosure.

1. Processing of personal data in the Company websites

1.1 Categories of personal data

When you visit the Company websites, the Company may process:

- (a) The data that you have entered for the purpose of your registration with the website and the services offered (user name, password, full name, contact phone, e-mail address, Connection Number, Tax Identification Number, communication content);
- (b) Personal data automatically collected while you browse (IP address, device type, browser, redirection website, company web pages that you visited, visit date and time).

1.2 Purpose of processing

Personal data are processed for the following purposes:

- (a) To serve a pre-contractual or contractual relationship in order for you to obtain personalized information and access your personal documents as well as in order for us to respond to your requests or contact you when you have so requested;
- (b) To document a legitimate legal claim or defence of the Company against an attempt at fraud, cyber-attack or other unlawful activity;
- (c) To create anonymized statistics on the number of visits and accessibility of the homepage and the individual pages, for the purpose of proceeding with necessary action aimed at improving your browsing experience.

1.3 Legal basis for data processing

The processing of your personal data is necessary in order to fulfill the above purposes. Unless otherwise stipulated at the time of collection of personal data, the legal basis for the processing of such data is one of the following:

(a) processing is necessary for the fulfillment of our contractual relationship with you (Article 6(1)(b) of the General Regulation);

(b) processing is necessary for the purposes of the legitimate interests pursued by the Company (Article 6(1) (f) of the General Regulation);

(c) you have given your explicit consent to the processing of your personal data (Article 6 (1) (a) of the General Regulation).

1.4 Data recipients and transfers

Some of our websites may be managed by third-party IT companies (processors). In such cases we make sure, via contractual provisions and regular inspections, that should such third parties have access to personal data this is done with due observance of the applicable legislation on data protection.

Notice applicable specifically to the website of Protergia : Personal data necessary for payment purposes (e.g. details of credit/debit/prepaid cards) are not collected by our corporate website – they are instead collected by Eurobank, being the bank appointed for the collection of payments by credit/debit/prepaid card that executes the payment of electricity bills solely through its corporate website; Accordingly, the screen in which such details are entered is located within the environment of Eurobank systems and, therefore, data are collected directly by Eurobank without Protergia intervening in the process. Consequently, Protergia does not collect or store or in general process at any stage in the payment process, the data that are necessary for payment execution (e.g. details of credit/debit/prepaid card such as card number, expiration date, cvv2) and is not involved in any manner whatsoever in the execution of payment.

1.5 Policy on Cookies

A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. The term "cookies" is used as a collective term to describe technologies such as cookies, Flash cookies and web beacons.

Cookies are used primarily to ensure that your visit to our site pages is as easy as possible, as well as for advertising purposes during your future visits to other websites. Our [cookie policy - reference] provides further details on the types of cookies we use, the use thereof, as well as on how to delete or prevent the placement of specific cookies on your computer or mobile device.

1.6 Personal Data of Minors

The Company and its websites are addressed to persons having completed their eighteenth (18) year of age. The Company has no liability if minors visit its websites on their own initiative. If during the data collection process it becomes evident that the user is of a younger age, the Company will not process the minor's personal data.

2. Processing of personal data related to your business relationship with the Company .

2.1 Personal data categories and sources

In the context of a potential or existing business relationship with the Company, the Company may process the following categories of personal data:

(a) Identification and contact information, such as full name, tax identification number, competent tax office, address, telephone number, mobile phone number, fax number, e-mail address, provided by our business partner or such partner's representatives for identification and communication purposes, information for classification under a special

customer category by the competent operators (e.g. vulnerable customer or customer entitled to a reduced residential tariff on social grounds), copies of connection contracts with the respective operators, certificate of business start issued by the Tax Office (in the case of a supply contract for commercial purposes), specific features documenting eligibility for a specific tariff (e.g. preservation of the contractual relationship with a specified third party).

(b) Specifically for the Energy Business Unit, details of the meter in the premises of the prospective or existing customer for which an electricity and/or gas supply contract has been or shall be concluded, documentation evidencing the lawful use of the premises (e.g. lease, ownership title), copy of the record in the land register, bills issued by the previous supplier, data on electricity and gas consumption obtained from the customers and/or the respective operators, bank account numbers advised by you, details of transactions and payments conducted in the context of the contractual relationship with the Company, details relevant to the contact of potential or existing customers with the Customer Service Department of the Company (including for requests, complaints, etc.).

(c) Data processed in the context of a project or a sale/purchase transaction covering goods or services, or data provided by the business partner, such as personal data with regard to orders, payments effected, requests and reports in the context of implementation of a project or a business cooperation in general.

(d) Information on credit worthiness and integrity (information with respect to litigation or other legal proceedings against business partners) collected from publicly available sources, databases and credit rating agencies and bureaus.

2.2 Purposes of data processing

1. Managing the contractual relationship with business partners, such as product acceptance, deliveries, provision of services, performance of work, collections, accounting audits, specifically for the energy business unit, operational and IT service, contract execution, support and monitoring, fulfillment of contractual obligations, etc.;
2. Conducting customer satisfaction surveys, advertising campaigns, energy analyses and market stratification, or other promotional activities or events;
3. Ensuring Company compliance with legal obligations (tax, social security, customs, accounting and other obligations) in the context of compliance checks of business partners for the prevention of financial crimes and the safeguarding of its overriding legitimate interests such as the transmission of data to law firms or competent authorities.

In the context and for the purpose of conducting energy analyses and market stratification, the Company may prepare energy profiles for optimally responding to the needs of its customers and/or providing energy saving advice.

2.3 Legal basis for data processing

Unless otherwise stated at the time of collection of personal data, the legal basis for the processing of such data is one of the following:

(a) data processing is necessary for the purpose of performing and fulfilling the contractual relationship with you (Article 6 (1) (b) of the General Regulation);

(b) you have explicitly consented to the processing of your personal data (Article 6 (1) (a) of the General Regulation);

(c) data processing is necessary for the purpose of complying with legal obligations of the Company or for the purposes of the legitimate interests pursued by the Company (Article 6 (1) (c) or (f) of the General Regulation respectively).

2.4 Data recipients and data transfers

The Company may transfer personal data to other subsidiaries or third parties, however only if and to the extent that such transmission is necessary solely for the above indicated purposes.

The Company may transfer personal data to judicial, administrative, taxation, customs, arbitration authorities or other public authorities, regulatory bodies and attorneys-at-law if necessary for its compliance with legislation and/or for establishing, exercising or defending its legal claims.

Furthermore, the Company may assign part or all of the said processing to third parties (processors) including their directors and employees:

- parties who have entered into contract with the Company for promoting the company services, for the provision of postal services, data processing support services, record-keeping services, survey services, conduct of energy analyses and market stratification, IT services, advertising services, banking and credit institutions, Certified Public Accountant firms;
- parties who have entered into contract with the Company for assessing the creditworthiness of the customer and the customer's ability to fulfill its obligations under the contract;
- companies informing debtors for debts in arrears, for the purpose of informing the customers pursuant to Law 3758/2009 as amended and applicable (their directors and employees), attorneys-at-law and law firms.

In the above cases we ensure by means of contractual terms and regular audits that, if and to the extent that they have access to personal data, the legislation on the protection thereof is duly complied with.

The recipients of personal data may be established outside the European Economic Area. In such cases, the Company takes measures so that adequate and appropriate safeguards are applied for the protection of personal data by other means, mainly by way of the use of the EU standard data protection clauses.

3. Data Retention Period

The Company shall store your personal data for as long as is necessary to achieve the purposes described in the present policy, unless the applicable legislation stipulates or allows a longer time period. The criteria governing the determination of the data retention period include the following: (a) as long as the contractual relationship is in effect; (b) as long as is necessary for the Company to be in compliance with a legal obligation it incurs; (c) as long as is necessary having regard to the legal situation the Company finds itself in (such as defense of rights in court, audits by regulatory authorities, etc.).

4. Technical and organizational measures

The Company effectively implements, both at the time of determination of the means of processing and at the time of processing, appropriate technical and organizational measures such as pseudonymization, designed for the application of data protection principles, such as data minimisation, and the integration of the necessary safeguards into the said processing

in a manner fulfilling the requirements of the applicable legislation and protecting the rights of natural persons.

5. Right to withdraw your consent

In case you have given us your consent to process specific personal data, you have the right to withdraw your consent at any time, with prospective effect. Such withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. In case of such withdrawal, the Company may further process your personal data only in cases where there is some other legal ground for such processing.

6. Rights of the data subject

Under the applicable legislation on personal data protection and provided the relevant legal conditions are met, you have the following rights:

6.1 Right of access

You have the right to be informed as to whether or not the Company processes your data, to have access to such data and obtain supplementary information in connection with such processing.

6.2 Right to rectification

You have the right to request that your personal data be updated, rectified or completed.

6.3 Right to erasure

You have the right to [submit a request](#) for the erasure of your personal data, and such request shall be granted provided no other legal grounds for processing are in place (such as, as an indication, compliance with a legal obligation to process personal data).

6.4 Right to restriction of processing

You have the right to request the restriction of the processing of your personal data in the following cases: (a) when you contest the accuracy of your personal data, and pending verification of the accuracy of your data; (b) when you oppose the erasure of your personal data and you request the restriction of their use instead; (c) when your personal data are no longer needed for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims, and (d) when you have objected to the processing and pending verification that our legitimate grounds for processing override those for which you object to the processing.

6.5 Right to object to the processing

You have the right to object at any time to the processing of personal data concerning you which is based on the legal basis of the processing (Article 6 (1) (e) or (f) of the General Regulation) and your objection shall be granted unless the Company demonstrates compelling legitimate grounds for the processing.

6.6 Right to data portability

You have the right to receive, at no cost, your personal data in a structured, commonly used and machine-readable format or to request, if technically feasible, that we transmit such data directly to another controller.

6.7 Right to oppose automated decision-making

You have the right to request that you be excluded from decision-making which is based on automated processing, including profiling.

In case you wish to exercise one or more of your rights and for your convenience please use this [form](#).

In special cases in which you would like to unsubscribe from our newsletters, and/or delete information you have just submitted to our site, please [click here](#)

7. Data Controller

The Data Controller is “Mytilineos Holdings S.A.”, located at 8 Artemidos Street, Maroussi, Attica, Greece.

The Company provides support for all questions, comments, concerns or complaints relating to personal data protection or should you wish to exercise any right in connection with the protection of your data. You may contact our Data Protection Officer by email at DPO@mytilineos.gr or by post at the following mailing address:

Mytilineos S.A.

Attention: DPO

8 Artemidos Street

GR15125 Maroussi, Greece

8. Right to lodge a complaint with the competent authority

If you wish to lodge a complaint with the competent authority, the competent authority for these matters is Hellenic Data Protection Authority (HDPA). You need first make an effort to exercise your rights to the Data Controller.

For the Authority's responsibilities and how to file a complaint, you can visit its website (www.dpa.gr> My Rights> Submitting a Complaint) where detailed information is available.