

**INFORMATION CONCERNING THE PROCESSING OF PERSONAL DATA OF THE SHAREHOLDERS OF THE
COMPANY**

**“ENTERSOFT SA OF SOFTWARE AND SERVICES PRODUCTION AND TRADE”
GENERAL COMMERCIAL REGISTRY NO: 122264001000
FOR THE PARTICIPATION TO THE REMOTE ORDINARY GENERAL MEETING OF 17.05.2024**

The societe anonyme under the trade name “ENTERSOFT SA OF SOFTWARE AND SERVICES PRODUCTION AND TRADE” (hereinafter the “Company”) due to the Ordinary General Meeting of its Shareholders on 17th May 2024 or the Repetitive General Meeting on 24th May 2024, which will be held remotely real-time via teleconference without the physical presence of the shareholders, hereto informs the shareholders and the persons due to their capacity that are going to participate to the Ordinary General Meeting (representatives of the shareholders, members of the BoD, Head of the Internal Audit Department, auditors, members of the Committees and other third persons) for the processing of their personal data according to REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation or GDPR), Law 4624/2019 and each and every legislation regarding the protection of personal data in force.

It is noted that ‘processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The Company is the controller of the personal collected by the Company for the Ordinary General Meeting of the shareholders of 17th May 2024 or the Repetitive General Meeting on 24th May 2024, which will be held remotely real-time via teleconference without the physical presence of the shareholders.

A. Personal Data collected

The Ordinary General Meeting of the shareholders of 17th May 2024 or the Repetitive General Meeting on 24th May 2024, will take place remotely, in real time, through audio-visual electronic means, by virtue of article 120 par. 3 and article 125 of Law 4548/2018, through the electronic platform “AXIA e-Shareholders Meeting” (the “Platform”) that has been developed by the “Hellenic Central Securities Depository S.A.” (hereinafter “ATHEXCSD”), to which the Company has assigned the organization of the General Meeting by distance. Through the Platform shareholders (or their representatives) will be able to participate in the General Meeting remotely, through electronic means, either real time or in the voting to take place 24 hours prior to the General Meeting, by virtue of article 126 of Law 4548/2018. In view of the aforementioned the Company receives services by ATHEXCSD, acting as data processor.

In addition, pursuant to Law 4607/2020, Law 4569/2018, and Resolution no 8 of the ATHEXCSD Board of Directors, the Company is entitled to request the identification of its shareholders who hold shares in both individual and omnibus accounts. Due to the above mentioned obligation, the Company has instructed ATHEXCSD, in the context of providing registry services, to collect from the intermediaries and to provide the Company with shareholder identification data, as well as with the data of the registered beneficiaries in the central depository, acting in all of the foregoing cases as

processor. For this purpose, ATHEXCSD will deliver to the Company, by the record date, a list of shareholders-beneficiaries with the right to participate in the Company's General Meeting.

Furthermore, in order for the Company to be compliant with other obligations of Law 4706/2020, we are obliged to transmit to our shareholders information relevant to the General Meeting through the chain of intermediaries and receive information concerning the exercise of the rights attaching to the shares. In this context, we receive services from ATHEXCSD, which will collect and transmit the relevant data to the Company, acting as data processor.

For the provision of the foregoing services and in the exercise of its duties, ATHEXCSD (the processor) or the processor's partners/subcontractors that are engaged by the processor in the provision of the services shall process the personal data of the shareholders and/or the shareholders' representatives.

The categories of data to be processed are the following:

- (a) Identification data (such as name, surname, father's name, address, no of ID),
- (b) Communication data (such as e-mail address and cell phone number),
- (c) user name and password for the access to the electronic voting platform of the General Meeting,
- (d) ownership of Company's shares
- (e) Investor Account Number and Securities Account number in the Dematerialized Securities System (DSS)
- (f) data regarding the votes submitted at the General Meeting per agenda item and in total,
- (g) audio-visual data of the shareholder's or their representative's participation at the General Meeting.
- (h) data from the participation of the natural person in the Ordinary General Meeting, as they have been recorder to the audio-visual material of the Meeting via teleconference.

The processing of the personal data from the electronic voting platform of the General Meeting will be performed through the services Zoom Meetings of the company Zoom Video Communications Inc., which provides video conference and the relevant data are maintained in the European Economic Area (EEA).

The above personal data are collected either directly from the Shareholders for the participation in the Ordinary General Meeting mentioned hereto either from third persons authorized by the Shareholders, either from the societe anonyme under the name "Hellenic Central Securities Depository S.A.", which, at its capacity as operator of the Dematerialized Securities System (DSS), keeps the details of identification of the Shareholders as well as other information related to shareholder structure of the Company, any transactions on the shares and are provided to the Company through electronic records, according to the provisions of the legislation in force and the Regulation of the Dematerialized Securities System (DSS).

In addition, the Company informs the Shareholders that, according to article 131 (way of voting in the General Meeting) par. 2 of Law 4548/2018, the remote voting is open and the exercise of the right to vote by the Shareholder and the content of his/her vote, if requested, may be communicated to the other participants in the General Meeting, Shareholders.

B. Lawfulness of processing the personal data

The above mentioned personal data of the shareholders, their representatives, as well as the persons that are going to participate in the Ordinary General Meeting of the shareholders of 17th May 2024 or the Repetitive General Meeting on 24th May 2024, are being collected by the Data Controller and the Data Processor for compliance to a legal obligation and more specifically in order for the shareholders to be identified and to be able to participate in the above mentioned Ordinary General Meeting, which will be held remotely real-time via teleconference without the physical presence of the shareholders, as well as in the mail vote being held at the latest 24 hours before the General Meeting.

C. Recipients of the personal data

Recipients of this data are the executives responsible for the management of the General Meeting of the Company, the societe anonyme under the name "Hellenic Central Securities Depository S.A." to which the Company has assigned, as the processor on behalf of the Company, the organization of the remote General Meeting as well as the sub-processor (further processors) the processing for the societe anonyme under the name "Hellenic Central Securities Depository A.E." the company Zoom Video Communications Inc., which provides the services Zoom Meetings, which provides video conference and the relevant data are maintained within the European Economic Area (EEA).

The Company shall not transmit or disclose the personal data of the Shareholders with the exception of:

- (a) Natural persons and legal entities, to which the Company assigns the execution of certain tasks on its behalf, such as, inter alia, to providers of technical and support services, 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), in general to providers of services, to lawyers, law firms, accountants, chartered accountants or audit firms, to external advisers and collaborators of the Company.
- (b) The societe anonyme under the name "Hellenic Central Securities Depository S.A.".
- (c) Supervisory, audit, tax, independent, judicial, police, public and/or other authorities and bodies within the scope of their statutory tasks, duties and powers (indicatively Bank of Greece, European Central Bank, Hellenic Capital Market Commission, Athens Stock Exchange, Hellenic Central Security Depository, Anti-Money Laundering Authority, Deposits and Loans Funds, General Commercial Registry).
- (d) Other Shareholders of the Company as appropriate, in accordance with the law.
- (e) Other companies which belong to the Group of the Company.

In case that transfer of personal data to third countries (i.e. to countries outside the European Economic Area (EEA) or international organizations is required, such transfer and in general processing shall be subject to compliance with the GDPR and in general the legislative framework with regard to the protection of personal data and only under the condition that requirements shall be met and the provisions of GDPR shall be applied, in order to ensure that the level of protection of natural persons guaranteed by GDPR is not undermined and that sufficient safeguards are provided for the protection of personal data.

D. Retention of personal data

The above mentioned personal data will be stored by the Company for the period of time determined by law and in general required by the legal and/or regulatory framework in force or is required for the purposes of legitimate interests of the Company, for the exercise of claims and for the defense of the Company in case of litigation, for the pursuit of claims of the Company as well as for the performance of contractual obligations and in general in accordance with the respective the legal basis and the purpose of their processing.

E. Right of the data subject

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, their source as well as the purposes of the processing, the categories of the personal data, the recipients or categories of recipients (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).
- c) To request the restriction of processing concerning her/his personal data, among others, when the accuracy of the personal data is contested or the processing is unlawful or the purpose of the processing was eliminated and provided that there is no legitimate reason to retain them (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 Company's records, when inter alia, there is no longer valid purpose of processing, subject to Company's obligations and legal rights to retain them, pursuant to the current applicable laws and regulations (right to be forgotten).
- f) To request for the transfer of the data she/he has provided to Company, in a structured, commonly used and machine-readable format or has the right to ask to transmit those data to another controller, provided that the processing is based on consent and is carried out by automated means and subject to Company's legal rights and obligations to retain the personal data (right to data portability).

Furthermore it shall be noted that 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 the capacity as shareholder and/or the possession of his/her voting right, for the exercise of his/her 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 legal rights, the compliance of the Company with its legal obligations or the fulfillment of the Company' obligations towards the 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, as well as in any case the 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 does not imply the deletion of data from the Company's records.

F. Exercise of the rights of the data subject

Each request from the Shareholders concerning the personal data being processed by the Company, as well as the exercise of their rights, shall be sent to the Data Protection Officer either in the e-mail dpo.office@entersoft.gr or at telephone number +302111015000.

G. Submission of complaints to the Hellenic Data Protection Authority

The Shareholder has the right to file a complaint with the Hellenic Data Protection Authority (www.dpa.gr), which is the competent supervisory authority for the protection of the fundamental rights and freedoms of natural persons concerning 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.