

Notice regarding the processing of personal data in the context of whistleblowing channel operation

The Company, under the name **OMILIA MONOPROSOPI ETAIREIA PERIORISMENIS EUTHYNIS PAROCHIS PLIROFORIKON, TILEPIKOINONIAKON KAI FONITIKON YPIRESION KAI SYSTIMATON**, with registered offices in Athens, Marousi, Efkalipton 2, 15126, (hereinafter the “**Company**”, “**we**”, “**us**”), in the capacity of controller, processes any information included in the report or otherwise brought to its attention in the context of the receipt and handling of a report.

This notice concerns you if you submit a report using the channel established by the Company to receive reports on breaches of EU or Greek law (“**reporting person**”), if you are named in the report as the person to whom the breach is attributed (“**person concerned**”), or if you are any other third party named in the report.

Personal data we process

We process any information included in the report or that has otherwise come to our attention in the context of receiving and handling a report. Depending on the case and the nature and content of each report, the Company processes the following data: the act or omission reported, name, age, address, email address, date of birth, photograph, telephone number(s), email address, voice, family members, signature, marital status, employment company, job title, department, position level, employment contract and similar data.

Purpose of the processing and legal basis

Personal data are processed by the Company, to the extent permitted or required by applicable law, for the purpose of receiving and evaluating reports on breaches of EU or Greek law. The legal basis for such processing is the Company's compliance with the Law 4990/2022 *on the protection of persons who report breaches of Union law* (the “**Law**”).

Additionally, we will retain your personal data based on the Company's legitimate interest in supporting any claim or objection we may have or face before any judicial and/or administrative authority.

Finally, the reporting person's consent will be requested if the Company needs to disclose their personal data to anyone other than the persons authorized by the Company to receive reports.

Recipients of your personal data

In the context of a report, the Company will share personal data and the information received with public, judicial, prosecutorial, investigative, supervisory, independent authorities and/or to any authority required to evaluate the report, as well as with external advisors (e.g., lawyers, auditors). The Company will also share personal data with third party service providers, specifically with the email service provider and the hosting service provider.

For the needs of receiving services by the aforementioned recipients, any transfer of your personal data outside the EU/EEA due to sharing of personal data with the said processors, will be based on an adequacy decision issued by the European Commission or subject to

suitable and appropriate safeguards and conditions to ensure an adequate level of data protection, e.g., data transfer agreements based on standard contractual clauses approved by the European Commission. For further information on how the Company protects personal data when transferred outside the EU/EEA or in order to obtain a copy of the safeguards we implement to protect personal data when transferred outside the EU/EEA, please contact us here: dpo@omilia.com.

Retention period of your personal data

Personal data is processed for the purpose mentioned above and will be retained for as long this is necessary for the management and following up on the report. In case of subsequent litigation or disciplinary proceedings or other proceedings before a court or independent authority, personal data will be retained until the conclusion of the said proceedings. In principle, the Company will retain your personal data for as long as required or permitted by applicable law, including for as long as the data may be required to pursue or defend any claims that have not been time-barred.

Personal data which is manifestly not related for the handling of a specific report is not collected or, if accidentally collected, is deleted without undue delay.

Your rights

The Law provides for certain limitations to the General Data Protection Regulation (“**GDPR**”) rights of the persons concerned or third parties whose data were included in the report or have been obtained through monitoring measures. In particular, the Company may refuse to satisfy the right to be informed, the rights of access, rectification, erasure, restriction, etc. of the persons concerned and third parties, for as long as necessary, in order to ensure that the process described in the Whistleblowing Policy is carried out in accordance with the Law.

Subject to the above conditions and the conditions set out in the GDPR, you have the following rights regarding the protection of your personal data:

- **Right of access**: You can contact the Company so that we can inform you and explain whether and what personal data we retain about you and how we process them. You may also request a copy of your personal data that the Company retains.
- **Right to rectification**: If you believe your data is inaccurate or need to be updated, you have the right to request the rectification of inaccurate personal data and the supplementation of incomplete data.
- **Right to erasure**: Under certain conditions, e.g., when the personal data is no longer needed or you have withdrawn your consent or the data has been unlawfully processed, you have the right to request from the Company the erasure of your personal data.
- **Right to restriction of processing**: If you consider that your personal data is inaccurate or that their processing is unlawful, or you consider that the personal data is no longer needed by the Company, or you object to automated processing, you have the right to request that the processing be restricted.
- **Right to object**: You may object to the processing of your personal data by the Company on grounds that concern you and relate to your particular situation, unless, *inter alia*, there are compelling legitimate grounds for the processing which override

your interests, rights and freedoms. You also have the right to object when a decision concerning you is based solely on automated processing, including profiling, and this decision produces legal effects concerning you or significantly affects you.

- Right to portability: You may request to receive your personal data in a structured, commonly used and machine-readable format, and have your personal data transmitted to another organization (controller), which you will indicate to the Company.
- Right to withdraw consent: You may withdraw your consent at any time, without your withdrawal affecting the lawfulness of the processing based on your consent before its withdrawal.

For further and more detailed information about your rights, we encourage you to visit the Hellenic Data Protection Authority website (www.dpa.gr). If you have any queries or concerns, or you wish to exercise your rights (of access, objection, etc.) please contact us as indicated below.

You have the right to lodge a complaint with the Hellenic Data Protection Authority with regard to matters that concern the processing of your personal data by the Company. The Hellenic Data Protection Authority is based in Athens (1-3, Kifisias Avenue, GR-11523). More information on the competence of the Hellenic Data Protection Authority and how to lodge a complaint, you can find at www.dpa.gr.

You can contact the Company and/or exercise your above-mentioned rights at dpo@omilia.com.