



**PERSONAL DATA PROTECTION POLICY
IN ACCORDANCE WITH REGULATION (EC) 2016/679 AND THE GREEK LEGISLATION
IN FORCE**

The Societe Anonyme named "EKME METALLURGICAL, TECHNICAL, INDUSTRIAL & COMMERCIAL SOCIETE ANONYME" and trading as "EKME S.A.", Taxpayer Identification No. 094489962 and GEMI (General Business Register) no. 038333805000, based in Diavata Municipality of Delta, Thessaloniki, 6 Sofias Vebo St., P.O. 57008, respects and protects the Personal Data (hereinafter "Data") of those visiting its site, of its potential customers, customers, suppliers, partners, employees, and any person whose data may come to its knowledge when exercising its business and processing its transactions. To this end, the company commits to collect and process the data in compliance with the General Data Protection Regulation (EU) 679/2016 and in compliance with all applicable European and national legislation.

This policy includes the rules on the basis of which we collect and process your personal data and ensure the integrity and confidentiality of such data.

Method of collection of personal data and period of retention thereof

We collect your data exclusively from you during any communication made between us, in a contract, transaction, negotiation and expression of interest for any kind of cooperation and/or from publicly accessible sources.

We do not collect your data from or through third parties.

EKME collects, registers and processes different types of personal data. These may be for example:

- Personal data such as name, surname, address, contact numbers, email address, copy of identity card, passport (or other equivalent personal identification document), financial information, billing data you provide yourself by telephone, email and/or in writing and may arise from our mutual agreement and its performance.

EKME is required to keep documents or electronic records (contracts, applications and other correspondence) for as long as the contractual relationship, cooperation or services in general by EKME are in force and additionally for as long as it is specifically stipulated by law, up to the completion of the general limitation period of the claims, i.e. for a period of up to twenty (20) years from the expiration of the relevant contract in any way. Where, after termination of the contract, a request for dispute settlement is pending before a competent administrative, public or judicial authority, EKME is required to keep such data until a final settlement of the dispute has been reached.

Where no contract is concluded with the Company, your personal data shall be kept for five (5) years from the last communication.

The purpose of processing your personal data and the legal basis of data use

EKME may process your personal data as defined by law, provided that processing is necessary for at least one of the following legal bases, namely:

- To negotiate the terms of any cooperation during the negotiation stage
- To conclude a contract with you,
- To perform our the mutual agreement we have concluded,
- To process orders and all kinds of financial transactions and to issue relevant documents (delivery notes, service invoices),
- To make payments and perform charges and credits on both sides and to claim amounts and/or claims that are due to us,
- To comply with its legal obligations,
- To protect its legal interests,
- To carry out a task carried out in the public interest, or
- When you have given your consent

Change of purpose of processing

Data may be processed only for the purposes for which they have been collected, which is named herein. Data processing for another purpose can only be performed if we find that it is for a purpose compatible with any of the purposes for which it was originally collected or if you consent to our requested processing.

Exercise of your rights

With respect to the protection of your personal data, you have the option, by submitting a request to EKME, to exercise the following rights, such as:

- To know the personal data we keep and process, their origin, the purposes of their processing, their recipients, as well as the time of their keeping (right of access),
- right to correct, namely, the right to request the correction of inaccuracies and errors in your personal data kept in our records. In such cases, you must provide any necessary document to demonstrate the need for such correction or completion,
- right to delete (right to oblivion), namely, the right to request the deletion or end of use of your personal data kept in our records, subject to the more specific restrictions laid down in the General Regulations. Please note that we may not always be able to comply with a request on specific legitimate and valid grounds, of which we will specifically and reasonably inform you,

- right to limit the processing of your personal data, provided that the conditions laid down in the General Regulation are met,
- right to portability, namely, the right to ask the Company to directly transmit your personal data to the organization you will indicate to us, provided they are technically structured as required by the law in force.
- right to object-oppose to the processing of your personal data unless compelling legitimate conditions for processing are met that prevail over your interests, rights and freedoms or for exercising or supporting EKME's legal claims
- Finally, you may at any time withdraw your consent to the processing of your data, provided that our company relies on your consent as the legal basis for the processing.

To exercise those rights to the protection of your personal data, you should contact the company, and you must show your identity card or other legitimate public identity document.

EKME shall respond to your request free of charge, without delay and in any case within one month of receipt of the request, save in exceptional cases, so that the deadline can be extended by a further two months if necessary, taking into account the complexity of the request and/or the total number of requests. EKME shall inform you of any extension within one month of receipt of the request and of the reasons for delay. If your request cannot be granted, EKME shall inform you without delay and no later than one month of receipt of the request the reasons for and the possibility to complain to the Greek Data Protection Authority, as well as your right to appeal before the competent judicial authorities.

If your claim is found by EKME to be manifestly unfounded or extravagant, a reasonable and appropriate fee may be levied, because of the administrative costs involved for granting the request or EKME may refuse to respond to your request.

Finally, you also reserve the right to appeal or terminate before the Data Protection Authority (DPA) [1-3 Kifissias Ave., Postcode 115 23, Athens, tel.: +30 2106475600, email: contact@dpa.gr], should you think that your rights with regard to protection of your personal data have been infringed.

In order for EKME to resolve any clarification or query regarding the applicable personal data legislation, you may contact or submit a question to our company as follows:

EKME S.A.

6 Sofias Vempo Street, P.O. 57008, Diavata, Municipality of Delta, Thessaloniki,

Telephone Number: +302310755050

E-mail: ekme@ekme.gr

Security measures

EKME has taken appropriate technical and organizational measures to ensure compliance with personal data protection law as well as to achieve the appropriate level of security of personal data of its customers and third parties, whose data it processes, and of those using

its website. It has taken all necessary security measures to prevent access to personal data to anyone other than the persons duly authorized for that purpose and only for the processing purposes specified below. As part of our business activity in a lawful and legitimate manner, our support in the provision of services and the pursuit of our legal interests, we may disclose data to partners, such as contractors and subcontractors, legal advisors, accountants, tax consultants, IT service providers, area security and health insurance providers. Such persons only receive data strictly necessary for performing the work they undertake, and process them only by our express order and authorization and solely for the purposes stated in this Privacy Policy. We ensure that such persons take note of this Policy and that they respect and apply all European and national legislation on personal data protection, even by signing the relevant contractual terms.

Finally, data may be disclosed to public entities and services, to judicial and independent authorities, to tax authorities, and/or to insurance funds, if a statutory obligation is provided for by law and further to a request respecting the required formalities.

Data when visiting our site

If you just visit our company's website, we collect only data that are necessary for the operating system to connect to the site, i.e. IP addresses, communication protocols, and geographic location. Cookies used on our site neither collect nor process any data other than the above. They do not access any kind of file or document stored on the device from which you visit our site and cannot lead to your identification.