

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE SHAREHOLDERS OF THE COMPANY UNDER THE NAME "TECHNICAL OLYMPIC SOCIÉTÉ ANONYME" AND THE TRADE NAME "TECHNICAL OLYMPIC S.A." AND OF THE OTHER PARTICIPANTS IN ITS REMOTE ORDINARY GENERAL MEETING ON 30 JUNE 2026

1. PROVISION OF INFORMATION TO DATA SUBJECTS

The company under the name "TECHNICAL OLYMPIC SOCIÉTÉ ANONYME" and the trade name "TECHNICAL OLYMPIC S.A." (hereinafter the "Company"), in its capacity as Controller of personal data, within the framework of and in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter the "General Data Protection Regulation" or "GDPR"), Law 4624/2019 and, in general, the personal data protection legislation in force from time to time, hereby provides the required information on the processing of personal data of natural persons who are shareholders of the Company and at any time hold the status of shareholder in the Company, of the legal representatives and representatives of such shareholders, of any person having voting rights and, in general, deriving and/or exercising voting rights by representing legal persons, as well as of those participating in any capacity by remote means via videoconference or by postal vote in the Annual General Meeting of 30 June 2026, and in any adjourned, postponed, interrupted or repeat meeting thereof (hereinafter, for the purposes of this notice, all the above categories of natural persons shall be referred to collectively as "Shareholders" and each individually as a "Shareholder").

Furthermore, the Company informs, in its capacity as Controller, in accordance with the GDPR, Law 4624/2019 and the other provisions on personal data protection, the natural persons other than the Shareholders who will participate in the videoconference of the remote General Meeting, such as the Members of the Board of Directors of the Company, the Company's executives, auditors and other third parties, that it processes their personal data, which are collected directly from the data subjects for the purposes of the legitimate interests pursued by the Company in relation to such processing.

It is noted that "processing" of personal data 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 any other form of making available, alignment or combination, restriction, erasure or destruction.

The Company, as issuer of the shares, lawfully processes the personal data of Shareholders, in the above capacities, always for lawful and legitimate purposes, observing the principles of fair

and transparent processing, implementing appropriate technical and organisational measures, complying with the requirements of the GDPR and the legislative framework in force from time to time, and always having as its guiding principle and primary concern the safeguarding and protection of personal data and of the fundamental rights of data subjects.

Further to the above, the Company, in compliance with the principle of transparency, hereby informs the above natural persons of the terms governing the processing of their personal data.

I. What personal data the Company collects and processes

The personal data of Shareholders collected and generally processed by the Company in the context of the operation and servicing of their shareholder status and for the performance of the tasks governing the shareholder relationship are strictly necessary, appropriate and relevant, and are limited to what is necessary for the purposes for which they are processed.

Indicatively, the main categories of personal data concerning Shareholders, which the Company processes for the fulfilment of lawful processing purposes, are the following:

- (a) Identification data, such as full name, father's name, identity card number or equivalent document, passport details, tax identification number, profession, citizenship and other demographic details.
- (b) Contact data, such as postal and email address, landline and mobile telephone number.
- (c) Number and class of shares.
- (d) Securities Account Number in the Dematerialised Securities System (D.S.S.).
- (e) Data relating to the capacity in which the Shareholder participates in the General Meeting and the relevant supporting documents.
- (f) Correspondence data with Shareholders.
- (g) Data relating to the Shareholder's participation and exercise of voting rights at the Company's General Meeting, details of various requests submitted from time to time to the Company, Shareholders' signatures and, in general, any other information in the context of the application of the provisions in force from time to time on markets in financial instruments.
- (h) Audio data (audio recording) if the Shareholder takes the floor during the General Meeting.

II. Where we collect your data from

The above personal data are collected either directly from the Shareholders themselves, for the handling of matters concerning them - who should ensure that their details are updated so that the Shareholders' Register is always current and up to date - or from third parties authorised by the Shareholders, or from the société anonyme under the name "EURONEXT

SECURITIES ATHENS S.A.", which, as operator of the Dematerialised Securities System (D.S.S.), keeps Shareholders' identification details and other information relating to the Company's shareholder base and share transactions, which are made available to the Company through electronic files in accordance with the provisions of the applicable legislation and the Regulation of the Dematerialised Securities System (D.S.S.).

The Company informs Shareholders that, for the purposes of their participation in the remote Annual General Meeting or any Repeat Meeting thereof, the Shareholders' access credentials to the online platform <https://axia.athexgroup.gr>, through which they will be able to participate and vote remotely at the General Meeting (hereinafter the "Online Platform"), will be collected and processed by the processor "EURONEXT SECURITIES ATHENS S.A.", to which the Company has assigned the organisation of the remote General Meeting.

The Company also informs Shareholders that, in accordance with Article 131 (voting method at the General Meeting), paragraph 2, of Law 4548/2018, remote voting is open and the exercise of voting rights by the Shareholder and the content of his/her vote may, if requested, be disclosed to the other Shareholders participating in the General Meeting.

At the same time, the Company processes the following data of natural persons other than Shareholders who will participate in the videoconference of the remote General Meeting, such as Members of the Board of Directors of the Company, Company executives, auditors and other third parties, which are collected directly from those data subjects for the purposes of the legitimate interests pursued by the Company in relation to such processing:

- (a) Identification data, such as full name, father's name, identity card, passport or other equivalent document.
- (b) Data relating to the capacity in which such persons are entitled to participate in the General Meeting.
- (c) Email address and mobile telephone number, for the purpose of the natural person's participation in the videoconference.
- (d) Image and audio data (video) from the natural person's participation in the General Meeting.

III. Why we collect your data and how we process them

The Company collects the personal data of Shareholders and of the other natural persons who will participate in the General Meeting, as described above, and generally processes them for the fulfilment of lawful processing purposes and always on valid legal bases that establish the lawfulness of such processing.

In particular, the Company processes the personal data of natural persons for:

- (a) the identification of the Shareholder;
- (b) communication with the Shareholder;
- (c) verification of the possibility and legality of exercising Shareholders' rights in accordance with the law, indicatively the exercise of participation and voting rights at the General Meeting, confirmation of shareholder status, preparation of Shareholder lists, keeping of minutes of the General Meeting, and conduct and implementation of corporate actions (such as dividend distribution, share capital increase, etc.);
- (d) notification to Euronext Athens of transactions by persons discharging managerial responsibilities and monitoring of transactions in the Company's shares;
- (e) fulfilment of the Company's contractual obligations towards Shareholders (such as for the distribution and payment of dividends) and, in general, fulfilment of the Company's obligations towards its Shareholders;
- (f) compliance by the Company with its legal obligations;
- (g) fulfilment and support of legal rights, and the protection and service of the Company's legitimate interests (such as in the context of the Company's legal claims), unless the interests or fundamental rights and freedoms of the data subjects requiring the protection of personal data override such interests;
- (h) fulfilment of obligations arising from provisions of tax legislation and other mandatory provisions of law;
- (i) keeping and management of the Shareholders' Register, in accordance with the provisions of the applicable legislation;
- (j) publication of the Company's acts and information in the General Commercial Registry (G.E.M.I.), on Euronext Athens or on the Company's website, where required by law;
- (k) responding to Shareholders' requests, handling Shareholders' requests in the context of services provided by the Company (e.g. issuing certificates), and providing responses and clarifications on specific questions or requests addressed to the Company by Shareholders;
- (l) keeping a historical archive of the Company's Shareholders.

IV. To which recipients may the above personal data be disclosed

Access to the personal data of the above natural persons is granted only to employees and officers of the Company, within the scope of their responsibilities and in the performance of the duties assigned to them, and in particular to those responsible for identifying such natural persons and verifying the legality of the exercise of their rights.

The Company does not transfer, disclose or communicate personal data, except:

(a) To natural and legal persons to which the Company from time to time assigns the performance of specific tasks on its behalf, such as, among others, database management companies, providers of services for the development, maintenance and configuration of IT applications, providers of email services, web hosting services, including cloud services, lawyers and law firms, certified public accountants or audit firms.

(b) To the société anonyme under the name "EURONEXT SECURITIES ATHENS S.A.", to which the Company has assigned, as processor on behalf of the Company, the organisation of the remote General Meeting, and to the sub-processor (further processor) of "EURONEXT SECURITIES ATHENS S.A.", namely ZOOM Video Communications Inc., which provides the Zoom Meetings service enabling videoconferencing, with the related videoconference data being kept within the European Economic Area (E.E.A.).

(c) To supervisory, audit, independent, judicial, police, public and/or other authorities and bodies within the framework of their statutory powers, duties and authorities (indicatively, the Hellenic Capital Market Commission, S.D.O.E., the Hellenic Anti-Money Laundering Authority).

(d) To other Shareholders of the Company, as applicable, in accordance with the law.

(e) To other companies belonging to the Company's Group.

The Company has lawfully ensured that those processing personal data on its behalf, as described above, meet all requirements and provide sufficient assurances regarding the implementation of appropriate technical and organisational measures, so that such processing meets the requirements of the GDPR and of the legislative and regulatory framework in force from time to time and ensures the protection of the rights of data subjects.

V. Are the data transferred to countries outside the European Economic Area (E.E.A.) (third countries) or to an international organisation?

The Company may transfer the Shareholder's personal data to countries outside the E.E.A. (third countries) or to an international organisation in the following cases:

(a) where the European Commission has issued a decision that the specific country or international organisation ensures an adequate level of protection of personal data;

(b) where the Shareholder has been specifically informed and has given his/her explicit consent to the Company for this purpose and the other requirements of the legal framework are met;

(c) where the transfer is necessary for the performance of a contract;

(d) where the transfer is necessary for the establishment, exercise or support of legal claims or for the defense of the Company's rights;

(e) where there is a relevant obligation under a provision of law or an interstate or international treaty; or

(f) in the context of the Company's compliance with the rules on the automatic exchange of information in the tax field, as arising from the regulatory framework.

For the fulfilment of the obligations under (e) or (f) above, the Company may transfer the Shareholder's personal data to competent national authorities, so that such data may be forwarded through them to the corresponding authorities of third countries.

VI. For how long will the data be retained?

Personal data are retained by the Company for the period prescribed by law and generally required by law and in accordance with the legislative and/or regulatory framework in force from time to time, or for the period required for the service and protection of the Company's legitimate interests, for the exercise of claims and for the defence of the Company in the event of litigation, for the pursuit of the Company's claims, as well as for the fulfilment of its contractual obligations and, in general, in accordance with the applicable legal basis and the purpose served by their processing.

VII. Rights of the personal data subject

In accordance with the GDPR, the data subject has the following rights, which may be exercised as applicable:

(a) To know which personal data concerning him/her are kept and processed by the Company, such as their source and the purposes of such processing, the categories of data, and the recipients or categories of recipients (right of access).

(b) To request the rectification and/or completion of such data so that they are complete and accurate, by providing any necessary document evidencing the need for completion or rectification (right to rectification), which at the same time constitutes an obligation of the data subject.

(c) To request the restriction of the processing of the data, among others, where the accuracy of the personal data is contested or the processing is unlawful, provided that there is no lawful reason for retaining the data (right to restriction).

(d) To refuse and/or object to any further processing of his/her personal data kept by the Company (right to object).

(e) To request the erasure of his/her data from the Company's records, among others, where there is no longer a valid reason for processing, subject to the Company's obligations and lawful rights to retain them pursuant to the legislative and regulatory provisions in force from time to time (right to be forgotten).

(f) To request the Company to transfer the data he/she has provided to it in a structured, commonly used and machine-readable format or to request the transmission or transfer of such data to any other controller, provided that the processing is based on consent and is carried out by automated means, and subject to the Company's lawful rights and obligations to retain the data (right to data portability).

The Company has, in any case, the right to refuse to satisfy a Shareholder's request for restriction of processing or erasure of his/her personal data if the processing or retention of such data is necessary for maintaining shareholder status and/or holding voting rights, for the exercise of his/her rights as a Shareholder of the Company and/or as a person having voting rights, as well as for the establishment, exercise or support of the Company's lawful rights, the Company's compliance with its legal obligations or the fulfilment of its obligations towards its Shareholders.

The Company has, in any case, the right to refuse the erasure of a Shareholder's personal data if such data are necessary for the purpose of keeping a historical archive of Shareholders (under III(I) above), as well as if the processing or retention of the data is necessary for the establishment, exercise or support of its lawful rights or the fulfilment of its obligations.

The exercise of the right to data portability (under (f) above) does not entail the erasure of the data from the Company's records. The exercise of the above rights generally has effect for the future and does not concern any processing of data already carried out.

VIII. How can the Shareholder exercise his/her rights?

For the exercise of the rights set out under VII above, the Shareholder may contact the Company, and specifically its Data Protection Officer, at the address TECHNICAL OLYMPIC S.A., 20 Solomou Street, Alimos, Attica, 17456, Greece, by email at dpo@techol.gr , by telephone at +30 210 99 77000, or by fax at +30 210 99 55586.

The Company will make every effort to respond to the data subject within thirty (30) days from submission of his/her request; however, this period may be extended by an additional sixty (60) days, where required at the Company's discretion, taking into account the complexity of the request and the number of requests. The Company will inform the data subject of any extension of the thirty (30)-day period within thirty (30) days from receipt of the request and will also inform him/her of the reasons for the extension.

The Company implements an information security management system to ensure confidentiality, the security of the processing of data subjects' data and their protection against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, as well as against any other form of unlawful processing.

The data subject has the right to lodge a complaint with the Hellenic Data Protection Authority (postal address: 1-3 Kifisias Ave., P.C. 115 23, Athens, Greece, tel.: +30 210 6475600, fax: +30 210 6475628, website: www.dpa.gr), which is the competent supervisory authority for the protection of the fundamental rights and freedoms of natural persons with regard to the processing of data concerning them, if he/she considers that his/her rights are infringed in any way, as well as the right to judicial remedy.

2. CONTACT DETAILS OF THE CONTROLLER & DATA PROTECTION OFFICER

TECHNICAL OLYMPIC S.A.

20 Solomou Street, Alimos, 17456, Greece

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