



STATEMENT ON PERSONAL DATA PROTECTION

The AVAX Group is one of the strongest construction groups in Greece, having created emblematic infrastructure projects for Greece, with a significant footprint in the Greek economy but also with a successful presence in international markets. Listed on the Athens Stock Exchange since 1994, the AVAX Group, with 2,400 employees today, has as its operational axes in Constructions, Concessions and Energy. Apart from AVAX DEVELOPMENT SINGLE MEMBER S.A., it includes in its strong structure the companies ETETH, AVAX International, AVAX Concessions, TASK AVAX, Athens Marina, iXion and AUTEKO.

In its day-to-day business activities, AVAX DEVELOPMENT SINGLE MEMBER REAL ESTATE TECHNICAL S.A. with the distinctive title AVAX DEVELOPMENT SINGLE MEMBER S.A. uses personal data concerning natural persons (employees, customers, partners-third parties). When processing this data, AVAX DEVELOPMENT SINGLE MEMBER S.A. is subject to the provisions of the General Data Protection Regulation (GDPR) and the applicable national legislation on the protection of personal data.

The creation and implementation of the personal data protection system of AVAX DEVELOPMENT SINGLE MEMBER S.A. aims to implement appropriate technical and organizational measures to ensure:

- That all users are aware of the basic principles of data protection and comply with the personal data protection policies, procedures, and best practices of AVAX DEVELOPMENT SINGLE MEMBER S.A.
- The protection of all information systems related to the protection of personal data in order to eliminate or mitigate the risks related to the theft, loss, misuse, damage, abuse or violation of these systems.
- That all users understand their own responsibilities for the correct application of the relevant legislation as well as for the protection of the confidentiality, integrity and availability of the personal data they handle.
- The continuous training-updating regarding the protection of personal data of the staff of AVAX DEVELOPMENT SINGLE MEMBER S.A.
- The continuous improvement regarding the protection of personal data of employees, customers and third-party partners.
- The monitoring, investigation and remediation of any actual or suspected incidents of personal data breaches.
- That AVAX DEVELOPMENT SINGLE MEMBER S.A. is protected from any type of damage from the incorrect application of the legislative framework for the protection of personal data.

The implementation and maintenance of the Privacy Policy of AVAX DEVELOPMENT SINGLE MEMBER S.A. and of the individual internal procedures on personal data protection is one of the main responsibilities of the Administration and its crucial task, always in collaboration with the active participation of the Data Protection Officer (DPO). In this context, AVAX DEVELOPMENT SINGLE MEMBER S.A. committed to:

- Continuously applies the relevant legislation on personal data protection.
- Checks and approves the Personal Data Protection Policy and the individual relevant internal procedures.
- Ensures the implementation of this policy and its requirements in the corporate process.
- Directs and supports the persons who contribute to the implementation and effectiveness of the personal data protection system.
- Actively supports administrative rules regarding personal data protection.
- Monitors the achievement of the objectives of the personal data protection system.

For any information regarding the protection of personal data, it is possible to contact the Data Protection Officer of AVAX DEVELOPMENT SINGLE MEMBER S.A. at gdpr-department@avax.gr.

This policy is communicated and constitutes a commitment and guide for all the hierarchy and staff of AVAX DEVELOPMENT SINGLE MEMBER S.A.

For AVAX DEVELOPMENT SINGLE MEMBER S.A.
THE MANAGING DIRECTOR

26/03/2024



CONSTANTINOS HASSABIS