

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF SHAREHOLDERS AND OTHER PARTICIPANTS

IN THE

ANNUAL GENERAL MEETING OF THE SHAREHOLDERS OF THE SOCIÉTÉ ANONYME UNDER THE NAME “Qualco Group S.A.” and

distinctive title “Qualco Group” with General Commercial Registry No. 182289601000

(hereinafter the “Company”) on

Tuesday, 30 June 2026 at 14:00.

The company under the name “Qualco Group S.A.” (hereinafter the “Company”) is the Controller of the personal data of shareholders collected during their participation in the Company’s Annual General Meeting on 30 June 2026. The Company enables shareholders who wish to participate in the proceedings of the above General Meeting, as well as in any repeat or adjourned session thereof, via teleconference, in accordance with Article 125 of Law 4548/2018. This notice provides information on the type of personal data of shareholders that the Company collects, the manner and purposes for which it processes it, the third parties with whom it shares such data, as well as the relevant rights of shareholders.

Categories of personal data processed by the Company

The personal data of shareholders and any proxies, which the Company collects and processes in the context of operating and servicing the shareholding relationship, are the most appropriate and relevant, and are limited to what is necessary for the purposes for which they are processed. For the remote conduct of the General Meeting, the Company relies on third-party electronic platforms, specifically Chorus Call's “Media Frame” platform, which provides teleconferencing services. To access the electronic platform, the shareholder or their proxy must provide a valid email address. Processing of the shareholder’s personal data for this purpose begins upon activation of the teleconferencing application via the relevant link. In particular, the Company processes the following personal data:

- Identification data, such as full name, patronymic, ID card or equivalent document.
- Data relating to the capacity on the basis of which persons are entitled to participate in the General Meeting and the relevant supporting documents.
- Email address for the purpose of the person’s participation in the teleconference.
- Image and audio data in the event that the participant in the General Meeting takes the floor during its proceedings.

- Number and category of shares held by the shareholder.
- DSS Investor Share Code.
- Data regarding participation and exercise of the shareholder's right to vote in the General Meeting, including data required for participation in an electronic teleconference (e.g. access credentials).

If the shareholder participates in the General Meeting via proxy, the Company will process the data included in the proxy appointment form, i.e. the proxy's full name, residential address, ID card number, email address and mobile phone number. The Company will also collect any information disclosed by the shareholder regarding a potential conflict of interest of their proxy.

Sources of personal data collection

The above personal data are collected either directly from shareholders for the performance of tasks concerning them, or from third parties authorised by shareholders, or from Euronext Securities Athens (formerly ATHEXCSD) which, in its capacity as manager of the Dematerialised Securities System (DSS), maintains the identity details of shareholders as well as other data relating to the shareholding structure of the Company and any transactions in shares, and are provided to the Company via electronic files, in accordance with applicable legislation and the Operating Regulation of the DSS.

Purposes of data processing and legal basis

The Company processes personal data for the preparation, conduct and follow-up of the General Meeting and for fulfilling its duties towards shareholders and their proxies, in particular to:

- process registration and participation of shareholders and proxies in the General Meeting (e.g. identity verification, right of participation, sending invitations, preparation of the attendance list and keeping it available for inspection), and
- enable shareholders and proxies to exercise their rights at the General Meeting.

The processing of personal data described above is carried out to ensure the Company's compliance with its legal obligations under Law 4548/2018. The legal basis for these processing operations is Article 6(1)(c) of the General Data Protection Regulation (GDPR). The legal basis for audiovisual recording of the General Meeting lies in the Company's legitimate interest to fully and accurately document the relevant discussions and decisions in the minutes of the General Meeting and to offer the electronic service to shareholders and their proxies to exercise their share rights in a user-friendly manner (Article 6(1)(f) GDPR).

Recipients of personal data

The above personal data of shareholders and their proxies, as recorded in the minutes of the General Meeting, are submitted to the competent G.E.M.I. authority, in accordance with applicable legislation. The Company may also disclose or transmit personal data to other recipients

authorised to process such data within the scope of their statutory duties, competences and powers (indicatively, Hellenic Capital Market Commission, Athens Exchange, Hellenic Central Securities Depository, etc.). In addition, copies of the minutes of the General Meeting are sent to the Company's shareholders upon request. The Company may also transmit or disclose personal data to natural and legal persons to whom it entrusts the performance of certain tasks on its behalf (including maintenance of the share register, IT service providers, lawyers, law firms, accountants, statutory auditors, or audit firms). The Company carefully selects its service providers, who act only in accordance with its instructions, as ensured by contractual commitments and appropriate technical and organisational measures.

Transfer of personal data outside the EU/EEA

Personal data is processed in countries belonging to the European Union (EU) and the European Economic Area (EEA). If the transfer of personal data to third countries is required, such transfer and processing shall be in full compliance with the GDPR, to ensure that the level of protection guaranteed by the GDPR is not undermined and that adequate safeguards are provided for the protection of personal data.

Retention period

Personal data, as included in the minutes of the General Meeting, is retained for a period equal to the Company's duration of operation, based on its legitimate interest to safeguard business continuity, defend its position and interests, and for corporate transparency purposes. Audiovisual material from the recording of the General Meeting is retained for three (3) months for the above purposes. Beyond that, personal data is stored only in individual cases if necessary in relation to claims raised for or against the Company.

Rights of shareholders and their proxies

Each shareholder/proxy has and may exercise the following rights:

- the right of access to their personal data, as well as to information relating to processing,
- the right to rectification of inaccurate and completion of incomplete data,
- the right to erasure ("right to be forgotten"),
- the right to restriction of processing in the cases explicitly provided by law,
- the right to data portability in a structured, commonly used and machine-readable format (e.g. USB), either to themselves or to another controller,
- the right to object to processing based on the Company's legitimate interest as above,
- the right to withdraw any consent given.

Exercise of any of the above rights by the shareholder is effected by submitting a relevant written request to the Company, to which the Company will respond within one (1) month from receipt.

This deadline may be extended by two (2) additional months, taking into account the complexity of the request and the number of requests received. If a shareholder does not wish to have audiovisual recordings of any interventions during the General Meeting, they must, before taking the floor, notify the administrators via the electronic platform so that recording ceases for the period during which that shareholder has the floor. However, the content of their intervention will be reflected in the corresponding minutes, as required by applicable legislation.

Contact details

For any question, clarification or request concerning personal data protection in the context of participation in the General Meeting, shareholders may contact the Company's Data Protection Officer at the email address dpo@qualco.eu. In any case, shareholders have the right to lodge a complaint with the Hellenic Data Protection Authority (www.dpa.gr), using the following contact details: complaints@dpa.gr, 1–3 Kifisias Avenue, PC 115 23, Athens, tel. +30 210 6475600.