

Information of the Shareholders of European Reliance General Insurance CO.S.A. On the General Data Protection Regulation

The following information aims to give you an overall image on the method that we process your personal data, as well as to inform you on your rights according to the General Data Protection Regulation (EU Regulation 2016/679) and the Greek L. 4624/2019.

1. Who is responsible for data processing and who should you address to?

European Reliance General Insurance Co. S.A. is responsible for your data (Data Controller). Our address is 274 Kifisias Avenue, 15232, Chalandri, Attica. For any matter related to personal data processing, you may contact the Data Protection Officer of our Company in the e-mail address dpo@europisti.gr. If you have any questions regarding our Registry of Shareholders, you may address the Investor Relations Department, in the e-mail address ir@europisti.gr

2. What data do we process, for which purpose and under which legal basis?

We process your personal data according to the General Data Protection Regulation (GDPR), L. 4624/2019, L. 4548/2018, L. 2396/1996 and L. 3756/2009, the Regulation of Operation of the Dematerialized Securities System (hereinafter Dematerialized Securities System Regulation), as well as any other legislation or regulatory act, for the purposes that are provided for in the above legislation.

More specifically, the shares of European Reliance General Insurance Co. S.A., are nominal, according to its Article of Associations, and intangible, as shares of a Greek Société Anonyme, which is listed on the Athens Stock Exchange. Articles 41 of L. 4548/2018, art. 39 of Law 2396/1996 and art. 2 of Regulation of Dematerialized Securities System, as applicable, provide that for the shares of Société Anonymes that are listed on the Athens Stock Exchange, no titles will be issued, but the shares will be rather registered in the Registry of the Dematerialized Securities System and monitored with records in these registrations. According to the Regulation of Dematerialized Securities System, the Company creates an Investor's Share, and registers among others, the first and last name of the Shareholder, the father's name, the data of the identification document, the date of birth, citizenship, tax information (article 4 of the Regulation of Dematerialized Securities System), as well as the number and type of shares owned.

Moreover, the Société Anonyme with company name "Greek Central Securities Depository SA", (ATHEXCSD), as the Manager of the Dematerialized Securities System informs European Reliance General Insurance Co. S.A., by forwarding the necessary information, in cases that are defined by the provisions of the Law and the Regulation of the Dematerialized Securities System. Especially, in the end of the liquidation of every trading day on the Athens Stock Exchange, ATHEXCSD makes available to European Reliance General Insurance Co. S.A. the transfer operations that occurred on your shares.

Moreover, according to article 124 of L. 4548/2018 and the Regulation of Dematerialized Securities System, ATHEXCSD delivers to European Reliance General Insurance Co. S.A., via a

direct electronic data base, up to the record date, as defined in art. 124 of L. 4548/2019 -a statement of the recipient shareholders who are entitled to participate in the General Meeting of Shareholders of European Reliance General Insurance Co. S.A. Moreover, for the purpose of distribution of dividend and according to the Regulation of the Dematerialized Securities System, ATHEXCSD provides to European Reliance General Insurance Co. S.A. A File for the Determination of the shareholders entitled to a Dividend. This file, as distributed by European Reliance General Insurance Co. S.A., includes the personal data of our recipient shareholders.

Moreover, ATHEXCSD may, according to the Regulation of the Dematerialized Securities System, disclose to European Reliance data of the recipient shareholders, within the framework of implementation of other corporate actions, provided that these are performed via the Dematerialized Securities System, such as for example, increase of share capital, public offering, etc.

In addition to the above, European Reliance General Insurance Co. S.A., process personal data for purposes of communication with the shareholders, as indicatively, e-mail addresses, mobile phones, etc., as also family status information, for purposes of transfer of shares due to heritage or succession, according to the provisions of the Civil Code and the Regulation, so that the Company will be able to meet its obligations deriving from the applicable legislation.

Moreover, we use your data for other purposes, which are compatible with the above (especially the preparation of statistics, i.e. on the trend for acquisition of shares or the number of transaction or for the overall image regarding the key shareholders). Moreover, we process your personal data in compliance with other mandatory provisions, such as, according to the tax legislation, for purposes of tax retention due to distribution of dividend. The legal basis for processing of your data in this case, are the mandatory provisions in combination with article 6 (1c) of GDPR and L 4624/2019.

Moreover, we process your data in certain cases, to ensure our legal interests, according to article 6, (1f) of the GDPR and L. 4624/2019.

In the case that we proceed to processing of your data for any other reason, not mentioned above, you will receive relevant information.

3. Who has access to your personal data?

In our Company, European Reliance General Insurance Co. S.A., the only people with access to your personal data are the competent business units. The service providers and in general the representatives that cooperate with our company may also have access to your personal data for these purposes. Such companies (i.e. IT service providers and colleagues that prepare and organize the General Meeting of Shareholders) that cooperate with us and have access to the personal data of our shareholders exclusively as part of personal data processing procedures, as explicitly referred to in the relevant legislation (art. 28, GDPR and L. 4624/2019). In such situations, European Reliance General Insurance Co. S.A. continues to be liable for the personal data protection.

During your personal data protection, our colleagues ought to constantly follow our directions. In order to be sure about that, we have established strict contractual adjustments and we will proceed to technical/ organization measures and additional audits, when

required.

If you participate in the General Meeting of Shareholders, then, according to L. 4548/2018 and the Capital Market Commission regulations, third parties may read your personal data in the list of shareholders.

Moreover, your personal data, may be transmitted to public authorities, among other the Capital Market Commission, the General Commercial Registry (GEMI), as well as the Athens Stock Exchange, in order to fulfill their obligations, as provided by the law, to the judicial authorities and supervisory bodies of the Company.

4. Is your personal data transmitted to third countries?

The consignees that have the right to process your personal data with their own responsibility (i.e. Authorities that follow the obligations for granting of information, as provided by the law) may be registered in a third country.

European Reliance General Insurance Co. S.A. never transmits any personal data to any third country or international organization regarding this matter. The personal data is transmitted only to service providers outside the European Economic Area, to the extent that the European Committee has verified that the third country has set into implementation the appropriate framework for personal data protection or that provides the appropriate guarantees for personal data protection (i.e. National binding corporate regulation or standard contractual clauses of the European Commission).

5. For how long will the Company keep your personal data?

To the extent that we are not obliged to store your personal data, which derives from the law (i.e. Liability to keep your data, tax laws), your personal data is anonymized or deleted when they are no longer required for the purposes mentioned above. The time period for the storage of the personal data collected within the framework of provision of the law. Personal Data is kept for a time period according to the applicable law, (i.e. at least five years for the data collected within the framework of the European Regulation (EU) 596/2014 of the European Parliament and the Council of April 16, 2014 for Market Abuse (MAR). Furthermore, we store personal data for special cases, when it is considered necessary, for claims against European Reliance General Insurance Co. S.A.

6. What are your rights as data subjects?

According to the General Regulation (EU) 2016/679 and Law 4624/2019, you retain the following rights:

- The right of access, namely the right to receive a confirmation from European Reliance as to whether or not your data are processed and, if so, for what purpose, for how long, and who the recipients are.
- The right to correct any deficiencies or inaccuracies in your data.
- The right to erasure ("right to be forgotten") of your data from the folders of European Reliance, provided that the processing is no longer necessary.
- The right to restrict processing, in the event of proven inaccuracy of personal data, etc.
- The right of portability, that is the right to receive your data from European Reliance in a structured and commonly used format, when this is technically possible, so that you may forward it to another data controller.
- You may, at any moment, oppose to the processing of the Personal Data that refer to you. In this case, European Reliance will not further submit your personal data for processing, unless there are imperative and lawful reasons for processing, that prevail the interests, the rights and your freedoms or for purposes of establishment, exercise and support of the Company's legal claims.

The above rights are exercised without any expenses on your behalf, with the dispatch of a relevant e-mail to the Personal Data Protection Officer at dpo@europisti.gr. In case of request of additional actions and copies, European Reliance may impose the payment of a reasonable fee for administrative expenses.

If you exercise any of your aforementioned rights, European Reliance will take every possible measure to respond to your request the latest within thirty (30) days since its receipt, by informing you on its fulfillment, or for objective and legal purposes which prevent its fulfillment. Upon your notification by European Reliance, this deadline may extend for a time period of two months, if necessary, taking into account the complexity and the number of requests.

Moreover, the BoD members maintain the right to contact the Personal Data Protection Authority, which receives relevant complaints submitted in writing in its Protocol Department (1-3 Kifisias Avenue, P.C. Postal Code 115 23, Athens, tel. +30 210-6475600 / fax +30 210-6475628) or via e-mail at contact@dpa.gr. Furthermore, you always maintain the right to appeal to the Greek Courts.

European Reliance General Insurance Co. S.A.