

**ADOPTION OF MEASURES AND REGULATIONS ON HARASSMENT AND  
VIOLENCE IN THE WORKPLACE**

**ALTER EGO S.A**

**Approved at the Board of Directors meeting held on 16/10/2024**

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## **PART I: "POLICY FOR THE PREVENTION AND COMBAT OF VIOLENCE AND HARASSMENT"**

### **1. Introduction**

The purpose of this policy is to prevent and combat all forms of discrimination based on personal characteristics and choices, as well as any form of violence and harassment that may occur during work, whether connected to it or arising from it.

The company, "ALTER EGO A.E." (hereinafter referred to as the "Company"), declares that it recognizes and respects every individual's right to a work environment free from violence and harassment, and that it does not tolerate any such behavior, in any form, from any individual.

The Company adheres to all measures and obligations related to the implementation of the provisions of Section II of Law 4808/2021 for the prevention and handling of all forms of violence and harassment, including violence and harassment based on gender and sexual harassment.

In accordance with the provisions of Law 4808/2021, the Company has developed the "Policy for the Prevention and Combat of Violence and Harassment" (hereinafter referred to as the "Policy"), the main purpose of which is to create and establish a work environment that respects, promotes, and ensures human dignity and the right of every person to a workplace free from violence and harassment.

### **A. Specific Objectives of the Policy**

The Policy aims to prevent and address violence, harassment, and sexual harassment, and specifically:

- To inform the Company's employees about the concepts of "harassment" and "sexual harassment," the protection provided by current legislation against behavior that may constitute sexual harassment or harassment, their rights whenever they may be subjected to harassment or sexual harassment, and the actions they should take when they believe they are victims of harassment or sexual harassment.
- To encourage employees to participate and contribute to the prevention and addressing of harassment and sexual harassment in the workplace and to the creation of a friendly work environment for all employees, regardless of gender or sexual orientation.
- To promote the education and training of employees on the importance of:
  - (a) the principle of equal treatment between individuals,

- (b) the prohibition of discrimination based on gender or sexual orientation, and
- (c) the prevention, handling, and combating of harassment or sexual harassment.
- To encourage employees to participate and contribute to the prevention and addressing of harassment and sexual harassment in the workplace and to the creation of a friendly work environment for all employees, regardless of gender or sexual orientation.
- To promote cooperation between management and employees to maintain a healthy and safe working environment, with key characteristics such as mutual respect, politeness, honesty, understanding, and mutual support.
- To provide immediate protection for any employee who believes they are experiencing sexual harassment or harassment, or who has been subjected to harassment or sexual harassment, as well as protection from any potential retaliatory actions against them due to rejecting harassment or sexual harassment or filing a complaint for harassment or sexual harassment.
- To define the responsibilities of management whenever there are suspicions of harassment or sexual harassment incidents, or when such an incident comes to their attention, or when a relevant complaint is received.
- To guide management on the proper and immediate handling of complaints related to harassment or sexual harassment and on the protection of victims, as well as the other parties involved in the investigation of any complaint.

## **B. Statement - Commitment**

The Company, as the first step in expressing its commitment to addressing sexual harassment, harassment, and violence, makes a Policy statement which provides that:

- Discrimination based on gender, violence, harassment, and sexual harassment are strictly prohibited.
- Employees, regardless of their employment status, and the management of the Company have the obligation to comply with and support everything outlined in the Policy.
- Employees, regardless of their employment status, and the management of the Company have an obligation to maintain full confidentiality if they provide information as part of the investigation of a complaint. Commentary on confidential information and/or spreading rumors will not be tolerated.

- Employees and the management of the Company, as well as job applicants and other individuals working with the Company, have the right to be treated with equality and dignity.
- Violence, harassment, and sexual harassment in the workplace will not be tolerated, and the Company will take appropriate measures for this purpose, as provided by the relevant legislation and the Policy.
- Complaints regarding violence, harassment, or sexual harassment will be handled swiftly, seriously, and with complete confidentiality.
- Employees, regardless of their employment status, and the members of the management of the Company will be protected from victimization, adverse treatment, and harmful changes in their conditions as a result of their contribution in any form (e.g., complaint, testimony) to the investigation of a harassment or sexual harassment complaint.
- Any behavior that deviates from the Policy will have consequences for the perpetrators, which may include termination of employment.

The Policy is communicated to all employees and other collaborators of the Company and is posted in a visible location at its facilities as well as on its website.

## **2. Scope of the Policy - Persons it Applies to**

This Policy is adopted in accordance with Articles 9 and 10 of Law 4808/2021 and the relevant implementing regulations applies to the individuals specified in paragraph 1 of Article 3 of Law 4808/2021. Specifically, it applies to employees, individuals employed under contracts for work, independent services or paid mandates, employees through third-party providers, and apprentices.

The Policy applies both in the workplace and in locations related to corporate or group meetings, conferences, and events connected to work, whether at the Group's facilities or elsewhere, whether in person, online, or via telephone.

### 3. Forms of Harassment, Bullying, and Sexual Harassment

#### A. Definitions

"Violence and harassment" in the workplace are described in Article 4 of Law 4808/2021:

- a) "Violence and harassment" refer to forms of behavior, acts, practices, or threats that aim to, lead to, or may lead to physical, psychological, sexual, or economic harm, whether occurring once or repeatedly.
- b) "Harassment" refers to forms of behavior that have the purpose or effect of violating the dignity of an individual and creating a hostile, intimidating, humiliating, degrading, or offensive environment, regardless of whether it constitutes a form of discrimination. This includes harassment based on gender or other grounds of discrimination.
- c) "Harassment based on gender" refers to behaviors related to an individual's gender, which have the purpose or effect of violating their dignity and creating a hostile, intimidating, humiliating, degrading, or offensive environment, according to Article 2 of Law 3896/2010 (A' 107) and paragraph 2 of Article 2 of Law 4443/2016 (A' 232). These forms of behavior include sexual harassment as defined in Law 3896/2010, as well as behaviors related to an individual's sexual orientation, expression, identity, or gender characteristics.

Harassment and bullying are defined as unwanted behavior from an individual that is intimidating, malicious, annoying, offensive, humiliating, or degrading to another person. It may relate, but is not limited to, age, gender, sexual preferences, race, disability, religion, or beliefs of the other person and can be a recurring or isolated incident. It can be verbal, non-verbal, physical, and does not always occur face-to-face.

#### B. Forms of Harassment and Bullying

Indicative, but not exhaustive, examples of bullying in the workplace include the following behaviors:

- Spreading rumors and gossip
- Making offensive or aggressive comments about others' personal lives
- Targeting someone with shouting and anger
- Excluding and isolating someone from processes and social events
- Suggesting or implying that the employee should quit their job
  
- Repeatedly and constantly reminding someone of their mistakes and omissions
- Ongoing criticism of someone's work and efforts

- Pranks and jokes from others who dislike the individual
- Making false claims against someone
- Removing significant responsibilities and replacing them with trivial or meaningless tasks

### **C. Forms of Sexual Harassment**

Sexual harassment is a condemnable form of gender-based violence, which involves behavior that is gender-based, unwanted, and offensive, violating human dignity. It includes physical, psychological, verbal, and non-verbal behavior, and can appear as:

- Degrading or belittling calls
- Ridiculous comments, verbal insults, offenses, and threats
- Repeated teasing about personal physical features
- Offensive jokes
- Displaying offensive and obscene content
- Encouraging others to engage in the above actions
- Physical contact, unwanted touching, hugging, or kissing
- Sexual innuendos, hints, or demands
- Indecent assault or rape
- Sexual jokes, sexist comments, sexist hugs, sexist whispers
- Requests for sexual favors and dates
- Persistent following, both inside and outside the workplace

Below are indicative verbal forms of sexual harassment:

- Steering work discussions about sexual topics
- Personal questions about social or sexual life
- Questions about sexual preferences, stories, or fantasies
- Sexual comments about body, appearance, or clothing
- Spreading false rumors about someone's sexual life
- Sending kisses, or sounds of kisses
- Comments on personal features (e.g., body parts)
- Discussions of sexual content (preferences, etc.)
- Sexual jokes

- Proposals of a sexual nature



- Calling someone "beautiful," "sweet," "baby," or other sexist comments
- Sexual innuendos

Non-verbal forms of sexual harassment recognized include the following or others with similar characteristics:

- Derogatory noises (e.g., whistling)
- Touching clothes, hair, or other parts of the body
- Gestures
- Innuendos through glances
- Exposure of body parts
- Unwanted, offensive sexual emails or text messages, or inappropriate proposals on social media platforms

However, it should be noted that it is normal and expected in a modern work environment, where employees spend a large part of their day engage in social activities in addition to professional tasks.

**What should be emphasized is the undesirability of the behavior.** None of the above behaviors constitute sexual harassment if they are not unwanted by the recipient or if they are not of such a nature or form that violates the dignity of the individuals. If the behavior is acceptable and occurs with the consent of the parties involved, then it does not constitute sexual harassment.

The intent (whether good or bad, innocent or guilty, suspected or unsuspected) of the perpetrator is completely irrelevant and of no consequence. Good intentions do not negate behavior that constitutes sexual harassment.

Within its capabilities, the Company takes all appropriate measures and makes every reasonable adjustment to the working conditions to protect employment and support employees who are victims of domestic violence.

#### 4. Guidelines for Employees and Management on the Prevention and Addressing of Harassment and Sexual Harassment

##### A. Guidelines for the Prevention of Sexual Harassment, Harassment, and Violence

- Seek comprehensive and objective information about the legislation related to violence, harassment, and sexual harassment, as well as the protection mechanisms available.
- Participate in actions and programs aimed at combating the causes of gender discrimination, stereotypes, and prejudices that perpetuate violence, harassment, and sexual harassment.
- Avoid discussions, comments, insinuations, gestures, or expressions that target or reference the gender, sexual orientation, or gender identity of any individual.
- Correct your behavior when you realize that it annoys or offends another person, and do not hesitate to apologize.
- Set personal boundaries with others when you notice behaviors that annoy or offend you.
- Cooperate with management to improve the work environment and ensure the application of the Policy.

##### B. Guidelines for Dealing with Violence, Harassment, and Sexual Harassment

Recipients of violence, harassment, or sexual harassment often attempt to ignore or conceal it.

Avoid this defensive, passive, harmful, and unproductive approach and:

- Do not ignore or downplay the unpleasant feelings it causes you.
- Trust your judgment about the behavior of the person who is harassing you.
- Do not feel uncomfortable, ashamed, or blame yourself for the perpetrator's behavior.
- Do not choose isolation from others.
- Do not justify the perpetrator's behavior.

##### **Take responsibility to act appropriately:**

- Set your boundaries with the perpetrator.
- Reject or calmly and decisively address their behavior.
- If the individual continues the harassment or sexual harassment despite your efforts, inform a trusted person and also speak with your family.

- Keep a diary with details of the incidents of violence, harassment, or sexual harassment.
- Inform the designated "Point of Contact" at the company level.
- Submit a written complaint to the "Point of Contact," responsible for guidance and information, specifying and objectively stating what happened, when, and where. Use the "Complaint Submission Form" provided at the end of the document (Appendix A) for this purpose.
- Consult with the Labor Inspector of the Ministry of Labour (SEPE).

## 5. Duties and Responsibilities of the Company

### A. Ensuring a Respectful and Safe Work Environment

The Company:

- Recognizes that harassment and sexual harassment are forms of gender-based violence and constitute prohibited discrimination based on gender (or other grounds of discrimination) in the workplace.
- Acknowledges that violence is a prohibited form of behavior/practice, whether it is linked to the work or arises from it.
- Has a legal responsibility to ensure a safe, respectful, healthy, and friendly work environment.
- Is responsible for the prevention and addressing of violence, harassment, and sexual harassment.
- Recognizes the need to support the employment of workers affected by domestic violence.

Specifically, the Company:

- Protects all individuals covered by the Policy (employees, management, and third parties) from any act of discrimination based on gender, and especially from any behavior that constitutes violence, harassment, or sexual harassment, as well as from any act of direct or indirect adverse treatment due to rejecting violence, harassment, or sexual harassment, or due to filing a related complaint/testimony.
- Has an obligation to the individual who has suffered sexual harassment, harassment, or violence, or who has faced direct or indirect adverse treatment due to rejecting such behavior or filing a related complaint, to immediately take all appropriate

measures to stop and prevent its recurrence, as well as to remove any consequences of such behavior.

- In the absence of such actions, the Company is jointly responsible with the individual who committed the prohibited acts in question.
- It has an obligation to provide cooperation, assistance, access, and any relevant information to the competent authorities during an investigation, if requested.
- It has an obligation, to the extent possible, to use all appropriate means or reasonable adjustments to support the employment of workers who have suffered domestic violence.

## B. Measures Taken by the Company for the Prevention of Violence, Harassment, and Sexual Harassment

Historically, there have been no incidents of violence, harassment, or sexual harassment in the workplace or related to work at the Company. Additionally, the relevant study and analysis of potential risks did not lead to the identification of high-risk conditions that would require immediate remedial actions.

As a result, the Company, with the aim of preventing violence, harassment, and sexual harassment, is implementing the following measures related to the information and awareness of all individuals covered by the Policy. If working conditions significantly change in the future or if relevant incidents arise, the Company will conduct a new risk assessment and may implement additional measures to address them.

In detail, the Company takes the following measures:

- The Company communicates the Policy to employees, management, and relevant third parties, either in writing or by any other means, and ensures that violence, harassment, and sexual harassment in the work environment are not accepted, taking action in every case where any of the above do not comply.
- Ensures a work environment that is accessible, safe, and friendly, where relationships between all involved individuals are characterized by mutual respect, politeness, honesty, understanding, trust, cooperation, and support.
- Provides information regarding prohibited discrimination, the importance of combating and eliminating it, as well as the stereotypes that perpetuate and reproduce discrimination, gender-based violence, sexual harassment, workplace inequality, relevant legislation, and the benefits of adhering to and implementing these measures.

## 6. Management of Internal Complaints

In compliance with Article 10 of Law 4808/2021, the Company has established clear procedures for addressing violence, harassment, and sexual harassment. These procedures ensure the resolution of issues in a prompt and effective manner. The resolution process for any such issue can take **either an informal or formal form**.

### A. Internal/Informal Procedure

The internal procedure aims to investigate and address incidents within the Company:

- The complainant contacts the "Point of Contact" and submits their complaint in writing using the "Complaint Submission Form" provided at the end of the document (Appendix A). Alternatively, the complaint may be sent via email to v.tsiflikiotis@yahoo.gr.
- The "Point of Contact" records the incident's details, investigates the possibility of immediate communication or mediation, and informs the Company's Board of Directors.
- Based on the incident's history and with the complainant's written consent, the Company may:
  - (a) Encourage the complainant to explain to the individual causing the unwanted behavior that it is unwelcome, offensive, creates discomfort, and interferes with their work/studies, or
  - (b) Undertake mediation.
- The Company acts only if the violence, harassment, and/or sexual harassment occurs over a short period, the alleged perpetrator appears willing to discuss, and the complainant wishes mediation to take place.
- If the complainant opts for direct communication with the alleged perpetrator, the Company is responsible for monitoring the outcome.
- In cases of mediation, the Company takes responsibility for communicating with the alleged perpetrator.
- In all cases, the Company handles the matter with full confidentiality and ensures resolution within a reasonable timeframe.
- The "Point of Contact" signs and provides the complainant with the "Confidentiality Statement" from Appendix B.

The Company ensures that the internal/informal procedure for reviewing complaints of harassment or sexual harassment:

- Is clear, well-explained, and understood by all individuals it concerns.
- It is conducted with confidentiality and objectivity.
- Provides adequate guidance and support for the complainant.
- Treats both the complainant and the respondent with respect.
- Ensure that neither the complainant nor the respondent is victimized.
- Protects potential witnesses from victimization.
- Delivers are delivered within a reasonable timeframe from the date the complaint is submitted.
- Encourages the complainant to report incidents of violence, harassment, or sexual harassment either orally or in writing.
- Advises the complainant to carefully preserve any evidence they may have concerned their behavior and/or the behavior of the respondent.
- Ask the complainant if they wish to handle the situation themselves or if they need assistance.
- Inform the complainant of their right to file a formal complaint.
- If necessary, and without stigmatizing those involved, avoid professional collaboration between them and/or relocate them if they are in adjacent offices or on the same floor.

The internal/informal procedure **does not concern the submission of a formal complaint**. It addresses the submission of a grievance and in **no way replaces the official process** for filing and reviewing complaints of violence, harassment, or sexual harassment. At any stage of the internal/informal procedure, if they wish, the complainant may proceed with the internal/formal procedure, file a complaint with state institutions, or pursue legal action.

## B. Internal/Formal Procedure

To initiate the formal process for examining a complaint of sexual harassment, harassment, or violence, a written complaint must be submitted to the "Point of Contact" by an individual covered under the Policy. The complaint submitted will be reviewed by the Company's management (Board of Directors).

It is understood that harassment or sexual harassment can, in any case, be reported to the relevant authorities, who will conduct the necessary investigation. Article 12 of Law 4808/2021 designates the Labor Inspectorate and the Ombudsman as the competent authorities. Complaints can also be filed with the Police, which will investigate any potential criminal offense.

To maintain workplace safety and the integrity of investigations, the Company may, among other measures, reassign employees or modify their working hours while awaiting the investigation's outcome. During this period, partial or full access to buildings or facilities may be restricted.

If the investigation concludes that an incident of discriminatory treatment, violence, or harassment occurred, the Company will take appropriate corrective, disciplinary, or other actions against the offender. These actions may include, but are not limited to a. Disciplinary sanctions b. Changes in position, schedule, location, or method of work c. Termination of employment or cooperation agreements. In any case, the offender may also bear criminal and/or civil liability under applicable law.

Complaints proven to be clearly malicious will be deemed unacceptable and may be further investigated at the Company's discretion, including the motives and the parties involved. This is to restore order using all lawful means and measures.

### C. Criminal and Civil Procedure

Specifically, a victim of sexual abuse has the right to file separate criminal or civil charges against the alleged perpetrator. The victim's legal rights are in no way limited or affected by this Policy.

D. It is understood that this Policy is implemented alongside applicable legislation for the protection of the personality of employees, collaborators, and apprentices. It does not affect their legal rights, nor does it limit their right to file a complaint before the competent regulatory authorities.

E. Retaliation and victimization against the complainant are prohibited.

It is strictly prohibited to retaliate against or victimize the complainant, who, as the affected individual, exercised their rights and submitted a written complaint regarding an incident of violence or harassment. Retaliation and victimization of the complainant constitute a serious violation of this Policy and will result in consequences for the perpetrator of such actions. Designation of the "Point of Contact."

## 7. Designation of the "Point of Contact"

In compliance with Article 9 of Law 4808/2021, the Company designates its Legal Counsel, Mr. Vasileios Tsiflikiotis, as the "Point of Contact." In addition to his responsibility for guiding and informing employees on the prevention and handling of violence and harassment at work, he will also be responsible for the initial receipt of both formal and informal complaints, as well as providing related support. Following the completion of the investigation, he will prepare a report and submit it to the Board of Directors for the adoption of appropriate measures against the alleged perpetrator of harassment or an incident of violence. If the alleged perpetrator is a member of the Board of Directors, they will recuse themselves from the meeting where the decision on the complaint will be made.

APPENDIX A

**COMPLAINT SUBMISSION FORM**

You may file a formal verbal or written complaint.

The completion of the required details is mandatory for a written complaint. These details will be used exclusively for the purpose of investigating the submitted complaint.

1. Full Name of Complainant:

.....

2. Gender:

Female: .....

Male: .....

Age: .....

3. On behalf of whom is the complaint being submitted?

.....  
.....

*(In case the complaint is being submitted on behalf of another person)*

4. Address: .....

5. Contact Phone Number(s) : .....

E-mail: .....



6. Have you already approached the person against whom you are filing the complaint?

Yes .....

If yes, what response did you receive? (Please attach copies of all relevant documents)

.....  
.....

No.....

7. Against which person is the complaint being submitted?

.....

8. Describe the incident of violence/harassment.

(e.g., description of the complaint regarding sexual harassment)

.....  
.....  
.....

9. The harasser is: Male: ..... Female: .....

➤ Employer: .....

➤ My superior (Describe):

.....

➤ Peer (Same level): .....

➤ Customer: .....

➤ Other (Describe): .....

10. When did the harassment/violence begin?

How many days ago: .....

Start Date: .....

How many weeks ago: .....

Start Date: .....

How many months ago: .....

Start Date: .....

How many years ago: .....

Start Date: .....

11. Duration. Describe:

.....Days

.....Months

.....Years

12. Type of sexual harassment:

- Unwanted contact or touching: .....
- Pressure for establishing a relationship: .....
- Persistent pressure for going out/dating: .....
- Comments or discussions of a sexual nature: .....
- Obscene sexual jokes: .....
- Provocative gestures: .....
- Comments about clothing/appearance: .....
- Comments about the body or body parts: .....
- Pressure for sexual intercourse: .....
- Unwanted phone calls/emails: .....
- Pressure to fulfill sexual desires in exchange for favors: .....
- Whistling or other provocative sounds: .....
- Comments or discussions about sexual descriptions: .....
- Coercion into engaging in romantic/sexual relationships: .....
- Violation of personal space: .....
- Coercion into tolerating touching with threats: .....
- Attempted rape: .....
- Display of pornography (e.g., photos, posters, emails): .....
- Unwanted love letters: .....
- Unwanted text messages: .....
- Provocative clothing inappropriate for the occasion: .....

13. Describe in your own words:

.....  
.....

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APPROVAL:

14. How did you react?

- I firmly asked the person to stop the harassment .....
- I avoided them .....
- I politely asked the person to stop the harassment .....
- I asked colleagues to intervene .....
- I resigned .....
- I did nothing (ignored it) .....
- I verbally reported the incident to the relevant person .....
- I tolerated the situation .....
- I asked a family member to intervene .....
- I changed departments .....
- I hit them .....
- I spoke to my supervisor .....
- I laughed .....
- Other: .....

15. Did it have an effect?

- The harassment stopped immediately .....
- The harassment stopped gradually .....
- Nothing changed, they continued to harass me .....
- They were dismissed .....
- They resigned .....

16. Have you taken sick leave in the past year?

- Yes ..... No ..... How many days? .....
- Yes ..... No ..... What periods? .....
- Yes ..... No ..... For what reason? .....

17. Describe in your own words:

.....  
.....

18. Did you receive help from others regarding the harassment?

- From friends: .....
- From my family: .....
- From my partner: .....
- From a colleague: .....
- From a superior: .....
- From a professional (lawyer, psychologist, social worker): .....
- Other (Describe): .....
- From no one: .....

19. Have you kept evidence, e.g., letters, text messages, emails?

Yes..... No.....

20. Were there witnesses to the harassment?

Yes..... No.....

21. Do you know if other employees have experienced the same as you?

Yes..... No.....

22. What is your request now? Describe it in your own words:

.....  
.....

Date: / / .....

Place: .....

Signature .....

1 / 16-10-2024

APPROVAL:





## APPENDIX B

**CONFIDENTIALITY STATEMENT**

I understand and acknowledge that the investigation process regarding the complaint of ..... against ..... concerning an alleged act of harassment is strictly confidential.

I also undertake the obligation not to disclose anything to anyone, either within or outside the Company, whether it pertains to details of the complaint, the existence of the complaint itself, or any aspect of the ongoing process, either now or at any time in the future.

I further undertake the obligation to the best of my ability to prevent the leakage of any information related to the above and, where possible, to prevent any third party from gaining knowledge of it.

.....  
*Date*

.....  
*Name and Signature*

**PART II: "PERSONAL DATA PROTECTION POLICY COLLECTED IN THE CONTEXT OF ADDRESSING HARASSMENT"**

**1. Introduction**

The company under the name "**ALTER EGO S.A.**" (hereinafter referred to as the "Company" or "Employer," "we," "us") respects the privacy of its employees and complies with the General Data Protection Regulation (EU) 2016/679 (hereinafter "GDPR"). In the context of the Employer’s obligations to prevent and address violence and harassment in the workplace, as detailed and defined in Part II of Law 4808/2021, and particularly during the investigation process of an alleged incident of workplace violence or harassment, the Employer will collect and access personal data of employees/workers, regardless of their contractual or employment status.

This document provides details regarding Data Processing and outlines the appropriate measures for their protection. Non-compliance with this policy could have a significant negative impact on the Employer’s business operations, potentially leading to reputational loss and financial damage.

The purpose of this policy is to inform employees/workers of the Company about the processing of their Personal Data (as defined below) in the context of investigating an alleged incident of violence or harassment and to contribute to the Company's broader compliance with all applicable personal data protection laws, including Law 4624/2019 and the GDPR.

**2. Definitions**

<p><b>"GeneralData Protection Regulation" (GDPR)</b></p>	<p>Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance) (hereinafter "the Regulation").</p>
<p><b>"Personal Data"</b></p>	<p>Any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one whose identity can be determined, directly or indirectly, particularly by reference to an identifier such as a name, identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural, or social identity of that natural person.</p>
<p><b>"Special Categories of Data" (Sensitive Personal Data)</b></p>	<p>Personal data that is inherently sensitive in relation to fundamental rights and freedoms of natural persons and requires special protection, as the processing of such data could pose significant risks to the fundamental rights and freedoms of individuals. These personal data should include data revealing racial or ethnic</p>



	origin, political opinions, religious or philosophical beliefs, or membership in a trade union, as well as the processing of genetic data, biometric data for the purpose of unequivocally identifying a person, health-related data, or data concerning the sexual life or sexual orientation of a natural person.
"Processing"	Any action or series of actions performed with or without the use of automated means on personal data or sets of personal data, such as collection, registration, organization, structuring, storage, adaptation or modification, retrieval, consultation, use, disclosure by transmission, dissemination, or any other form of making available, alignment or combination, restriction, erasure, or destruction.
"Consent" of the data subject	Any indication of will, freely given, specific, explicit, and fully informed, by which the data subject expresses agreement, through a statement or a clear affirmative action, for their personal data to be processed.
"Personal Data Breach"	A security breach that leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to personal data that has been transmitted, stored, or otherwise processed.
"Employees"	For the purposes of this policy, " <b>Employees</b> " includes individuals employed under any form of employment relationship, as well as former employees.

### 3.Scope of Application

This policy outlines the framework for the processing of personal data of employees/workers collected in accordance with the explicit provisions of Law 4808/2021 and Ministerial Decision No. 82063/1 of November 2021 (Government Gazette 5059/B/1-11-2021). It applies to all employees/workers of the Company, regardless of the type of contract they have with the Company or their position, and covers all IT and network infrastructure, software, hardware, and various devices provided by the Company for use by the individuals.

### 4.What Data Do We Collect

In the context of the investigation, the Employer collects and processes the following personal data on the subjects:

- a) Name and surname.
- b) Address.
- c) Contact phone number(s).
- d) E-mail.
- e) Gender.

- f) Data related to the opinions and views of the data subject concerning other individuals related to the Employer, such as employees, supervisors, members of the management team, or former employees in these positions.
- g) Data regarding the date and location of the actions or conversations of the data subject.
- h) Responses from the data subject to questions in the relevant form (Questionnaire) or in written or recorded minutes.
- i) Data collected during interviews with the Investigation Committee, which may consist of paper documents or electronic files submitted for review by the involved employees.
- j) Signature.

## **5.How We Collect Personal Data**

### **A. Directly from the Data Subject**

The Employer collects personal data directly from the data subject through the following methods:

- i. By submitting the complaint.
- ii. By submitting files related to the documentation or defense against the complaint.
- iii. Through the conduct of oral interviews during the investigation of the incident.

### **B. From Third Parties**

Personal data may be collected from third parties in specific cases, such as:

- i. From the opposing party in the dispute.
- ii. From employees of the Company who are called to testify as witnesses or report an incident that came to their attention.
- iii. From third-party witnesses who are not employees of the Company, to the extent permitted or required by the investigation.

### C. Ex Officio

Where required, the Employer may collect data from:

- i. The personal file of each employee.
- ii. The records relating to the use of the Employer's technological and communication equipment, to the extent permitted by law.

## 6. Legal Basis for Processing

The Personal Data collected either directly from the data subjects, from third parties, or ex officio, shall be processed only for the lawful purposes of processing as described in the applicable legal framework. The lawful grounds for the processing of Personal Data include:

- (a) Compliance with legal obligations (Law 4808/2021 and Ministerial Decision 82063/1 of November 2021, (Government Gazette 5059/B/1-11-2021)).
- (b) Safeguarding and protecting the legitimate interests of both the Company and the employees themselves.
- (c) Consent provided by the data subject under the specific conditions set forth by the legal framework, such as in the case of recording and creating audiovisual material. In this case, participants will be asked to provide prior consent, either orally or in writing, in both cases with prior clear information and secure documentation methods to ensure valid consent. Failure to provide consent for the recording of an employee's testimony will not impact on the investigation or its outcome.

Specifically, regarding the processing of Special Categories of Data, processing is necessary for the performance of the obligations and the exercise of specific rights of the data controller or the data subject in the field of labor law and social security and social protection law, if it is permitted by Union law or the law of a Member State.

## 7.Data Disclosure

The Personal Data collected in the context of a complaint and the investigation of an incident of violence and harassment is used solely for fulfilling the obligation of internal investigation within the workplace, by the Board of Directors of the Company, in accordance with the provisions of Part I.

To ensure the best possible execution of the investigation and always in compliance with the applicable data protection legislation, the recipients of the Personal Data related to the investigation may include the following:

- Members of the Company's Board of Directors
- The opposing party
- To the extent necessary for cooperation, any relevant public, administrative, or judicial authority, which, either ex officio or upon request from the affected party, seeks the provision of data or information within its competence.

The Company takes all appropriate technical and organizational measures, particularly regarding the flow of data to the recipients or participants in the investigation process, who are bound by confidentiality clauses and confidentiality obligations regarding access or have a legal duty of confidentiality under the law.

## 8.Retention of Personal Data

The Personal Data collected during the investigation will be recorded in a special file and retained for as long as the internal investigation and evaluation of the data are ongoing and, to the extent necessary, within the framework of our cooperation with any competent public, administrative, or judicial authority, which, either ex officio or upon request from the affected person, within the scope of its authority, requests the provision of data or information. In this case, the data will be retained at least until the conclusion of the judicial investigation or the issuance of a final court decision. In all other cases, the data will be destroyed **one (1) year** after the completion of the investigation and the issuance of the relevant report.

After the relevant period has passed, the data will be deleted or destroyed using secure methods in accordance with the Employer's Storage and Destruction Policy. Data for statistical purposes may be kept indefinitely, provided it has been anonymized.

## 9. International Transfers

The Company will not transfer the Personal Data it collects from data subjects to other countries. However, if a transfer to third countries becomes necessary, the Company will take the appropriate measures to protect the Personal Data in accordance with the GDPR, such as sending it to countries that have received an adequacy decision or using Standard Contractual Clauses and any other guarantees to ensure the legality of the transfer.

## 10. Rights of Data Subjects

In accordance with the applicable law and within the context of the Investigation, the data subject, once they prove their identity and submit their written request, has the right to exercise the following rights:

1. The right of access, meaning the right to be informed about whether personal data is being processed and to receive further information regarding the processing being carried out, to the extent that it does not conflict with any rights of other individuals involved in the investigation who have a lawful right to confidentiality.

2. The right to request correction of any inaccurate personal data or to have it completed. At this point, the following distinction should be made:

- Data related to facts and elements that can be verified objectively (such as the date and time of an event, or the workplace of a participant) are subject to this right.
- Data originating from the claims of the parties involved and under investigation cannot be altered by exercising this right.

3. The right to object to further processing of their data.

4. The right to withdraw any consent given, for the future, without affecting the lawfulness of any processing carried out prior to the withdrawal.

If the conditions set by the law are met:

1. The right to erasure (right to be forgotten),
2. The right to restriction of processing,
3. The right to data portability.

The data subject can exercise their rights by sending a message to: [dpo@alter-ego.gr](mailto:dpo@alter-ego.gr). The Company will take all necessary measures to fulfill the request within a reasonable time and no later than one (1) month after the submission of the request and verification of the subject's identity. This period may be extended by two additional months if necessary, considering the complexity and number of requests.

Additionally, if the data subject believes their rights are being violated, they have the right to appeal to the Data Protection Authority regarding how the Company processes Personal Data ([www.dpa.gr](http://www.dpa.gr)) at the following link:

[https://www.dpa.gr/el/polites/katagelia\\_stin\\_arxi](https://www.dpa.gr/el/polites/katagelia_stin_arxi), Offices: Kifisias 1-3, Postal Code: 115 23, Athens, Telephone: +30-2106475600, Fax: +30-2106475628.

### 11. Protection Measures

The Employer, its employees, agents, assistants, and executors have taken appropriate technical and organizational measures to safeguard the security and protect personal data, with the aim of ensuring the safe processing of personal data and preventing accidental loss or destruction, as well as unauthorized and/or unlawful access to, use, modification, or disclosure of the data. Examples of these measures include:

- i. Physical security measures such as access control and logging, security policies, implementation of secure file destruction methods, installation of security locks, etc.
- ii. Electronic security measures such as user access control for information systems, installation of hardware and security software, etc.
- iii. Regular training and awareness sessions for responsible employees/staff.
- iv. Regular assessments of the effectiveness of security systems.

### 12. Changes to the Policy

This Policy may be amended to adapt to and comply with the applicable legal framework. In the event of any changes, employees will be informed in the most appropriate manner by the Employer.

REVISIONS TABLE			
ISSUE	MODIFICATION	COMPILED BY	DATE
1st	INITIAL DRAFTING OF THE DOCUMENT	S. GARDIKI	28/9/2021
2nd	AMENDMENTS BASED ON LAW 4808/2021	GAGDPR /S.GARDIKI	16/10/2024

