UPDATE

for the processing of personal data of the shareholders of the company "IATRIKO ATHINON CSA" in the framework of the Ordinary General Assembly of the 15/07/2021.

The company with the name “ATHENS MEDICAL CENTER S.A.”, with the distinctive title ""IATRIKO ATHINON SA" (hereinafter "IATRIKO"), with its registered seat at 5-7 Distomou street, Maroussi - Attica, V.A.T. Number 094129169, Tax Office of Athens for the Taxation of Sociétés Anonymes, (hereinafter «Company»), (No. of General Chamber of Commerce 0356301000, AFM. 094129169, Tax Office of ATHENS), in the capacity of Head of Processing and respecting the provisions of existing EU and national legislation for the Protection of Personal Data of Regulation (EU) 2016/679, also known as the General Data Protection Regulation (hereinafter referred to as "the GDPR") and Law 4624/2019, hereinafter jointly "Existing Data Protection Legislation", addressed to its Shareholders regarding the processing of their personal data in the context of the holding of the Ordinary General Meeting of Shareholders 15/07/2021, as well as and for each repeated or adjourned or interrupted meeting, provide the following information:

1. Data categories and processing purposes.

IATRIKO collects and processes your absolutely necessary personal data according to the Existing Data Protection Legislation, the Operating Regulations of Dematerialized Securities System (DSS)and any other relevant regulatory framework governing the lawful conduct of the forthcoming General Assembly in order to serve the Shareholder’ s relationship, according to the above applicable regulatory framework. Process of personal data means any operation or series of operations performed with or without the use of automated means, on personal data or on personal data sets, such as the collection, registration, organization, structure, storage, adaptation or alteration, retrieval, research for information, use, disclosure by transmission, dissemination or any other form of disposal, correlation or combination, restriction, deletion or destruction, In particular, IATRIKO collects and processes the following :

i) Identification and legalization data of natural persons, acting on their behalf individually and / or as legal representatives of companies or natural persons, for the exercise of their rights as shareholders (hereinafter "Subjects"): name, patronymic, identity card, passport or other equivalent document, VAT number, competent Tax Office, country of tax residence, any special tax treatment, citizenship, date of birth, occupation or main object of work, bank account number, signature, etc.

ii) Share details and equity data or metadata: number of shares, voting rights, in particular share rights, DSS share number, securities account number, investor share code number (K.A.M.E.), percentage and type of participation, trading activity on shares, etc., details of various requests they submit from time to time to IATRIKO.
iii) Contact details: postal and / or e-mail address, landline and / or mobile phone, fax number and so on.

The above data are collected either directly by the Shareholders themselves, for the accomplish of issues that concern them – the Shareholders themselves should update their data, so that the Register of Shareholders is always updated and updated - or by third parties authorized by the Shareholders, or by the Company under the name "Hellenic Central Securities Depository SA", which as an administrator of the Dematerialized Securities System (DSS) keeps the identification details of the Shareholders, as well as other information concerning the shareholding of IATRIKO, through electronic files, according to the provisions of the current legislation and the Regulation concerning the Dematerialized Securities System (DSS).

2. Purposes and Legal bases of processing.

IATRIKO, as the Controller, collects and processes the above mentioned personal data of the Shareholders for the fulfillment of legal processing purposes and always according to the valid legal bases that establish the legality of the processing. More specifically, IATRIKO processes personal data of the Shareholders for the fulfillment of the following purposes:

- In order to be able to legally participate and exercise the rights of Shareholders in the General Meetings, confirming the capacity of the Shareholders.
- For communication with the Shareholders.
- For the conduct of corporate actions and contractual obligations of IATRIKO to the Shareholders (e.g. dividend distribution, share capital increase),
- To manage and maintain the Shareholders' Book, in accordance with the relevant legal provisions,
- For the processing of requests submitted by the Shareholders in the context of services provided by IATRIKO (e.g. issuance of certificates)
- To provide clarifications and answers to specific questions or requests addressed to the IATRIKO by the Shareholders.
- For the participation of IATRIKO or other companies of the Group, in public and other Competitions.
- For the monitoring of the transactions on the shares of IATRIKO.
- To fulfill its obligations arising from the legislation on the prevention of financial crime, money laundering and the risk of fraud.

- For the purposes of conducting an over-the-counter transfer of its shares, due to inheritance or bequest, in accordance with the provisions of the Civil Code and the DSS Regulation .
- For the notification to the Athens Stock Exchange of transactions of liable persons.
- For the publication of transactions and data of the company on General Commercial Register, on the Athens Stock Exchange or on the website of IATRIKO, when required by law.
- For the fulfillment and protection of legal rights, the defense and service of legal interests of IATRIKO (as in the context of legal claims of IATRIKO), unless those interests prevail over the interest or the fundamental rights and freedoms of the subject data protection.
- The keeping of a historical file of Shareholders of IATRIKO.

The process of your personal data is necessary for:

(a) the compliance with the legal obligations of IATRIKO (article 6 par. 1 c of the GDPR) and mainly with the regulatory framework for public limited companies (Law 4548/2018), the DSS Regulation (for listed companies), as well as and the decisions of authorities (public, supervisory, independent, prosecutors, etc.) or courts (regular or arbitral), and in general any regulatory framework governing its legal operation (eg tax, insurance legislation).

(b) the service of the legal interests of IATRIKO (article 6 par. 1 f of the GDPR), such as keeping a historical record of the Shareholders, exercising and supporting any legal claims, conducting analyzes and statistics, as well as promoting of the corporate image and activities of IATRIKO, unless the interests or the fundamental rights and freedoms of the data subjects that impose the protection of personal data prevail over these interests.

(c) for the compliance of IATRIKO with its contractual obligations to the Shareholders (article 6 par. 1 bd of GDPR), as indicatively the distribution of the dividend corresponding to their shares.

(d) The process is carried out after your consent as Shareholders (article 6 par. 1 a GDPR). In limited cases, IATRIKO may seek the consent of the Shareholders with a statement or clear positive action (opt - in) before making specific processing of your personal data, such as indicative of the use of your photos in printed corporate material. In these cases, IATRIKO as Controller provides additional and sufficient information for the use of the personal data of the Shareholders, so that you can decide whether or not to provide your consent, as well as to revoke it at any time by contacting the email address: dpo@iatriko.gr. It is noted that any revocation of your

consent does not affect the legality of the processing based on prior consent, before its revocation.
For any further processing for purposes other than the above, IATRIKO will provide you with a newer update.

3. Who has access to your data.

Access to your personal data has only competent authorized and properly trained staff of IATRIKO, as well as cooperating third parties (service providers) in the context of a General Meeting, bound by professional secrecy or have contractually committed to the protection and legal processing of the data they process, according to the provisions of the Existing Legislation for the Processors (art. 28 GDPR).

In particular, IATRIKO can transmit your personal data:

- to competent Public and / or Supervisory Authorities and Services (eg Tax, Audit Authorities), in the context of compliance with the applicable legal framework. Therefore, the recipients of your personal data may be the General Commercial Register, the Hellenic Capital Market Commission, the Athens Stock Exchange, Deposits and Loans Fund, Central Securities Depository, etc.
- to Competent Law Enforcement Authorities or Administrative Authorities, if required by law or any other legally enforceable act or order.
- To other Shareholders of IATRIKO, as the case may be, according to the provisions of law.
- To persons and companies, to whom IATRIKO assigns the execution of specific tasks on its behalf, such as for example to technical and support service providers, to database management companies, to file storage and management companies, to postal service providers, services development, maintenance, e-mail service providers, e-mail service providers, web hosting services, including cloud services, general service providers, lawyers and accountants, accountants, chartered accountants or auditing firms, external consultants and associates of IATRIKO.

IATRIKO has legally ensured that those who process personal data on its behalf, in accordance with the above, meet all the conditions and provide sufficient assurances for the implementation of appropriate technical and organizational measures, so that such process can meet the requirements of the GDPR and the applicable legal and regulatory framework and ensures the protection of the rights of data subjects.
In case the transmission of personal data to third countries (countries outside the European Economic Area (EEA) or to international organizations is required, such transmission and process in general will always be carried out according to the GDPR, as the legal framework for the protection of personal data and only if the conditions

and provisions of the GDPR are met, which are intended to ensure that the level of protection of individuals guaranteed by the GDPR is not undermined and that adequate guarantees are provided for the protection of personal data.

4. Maintenance period of your data.

The personal data of the Shareholders that will be processed by IATRIKO within the framework of their shareholder capacity, will be compulsorily kept throughout the corporate life of IATRIKO, according to the current institutional framework (Law 4548/2018, Law 4706 / 2020 etc.), which is deemed necessary for the fulfillment of the above purpose of the process, taking the appropriate technical and organizational measures for the safe processing of this data and for ensuring the appropriate level of data security against the risks, e.g. destruction, loss, alteration, unreasonable disclosure / access, unauthorized read - copy, modification or deletion of personal data to ensure the confidentiality, integrity, security, availability and reliability of processing systems and services on an ongoing basis.
At the end of this period, the data will be deleted, unless otherwise specified by the applicable legal and regulatory framework or as required to defend the rights of IATRIKO before a Court or other competent Authority.

5. Measures for the protection and security of the Shareholders' data.

IATRIKO incorporates in its systems, policies and internal procedures all the technical and organizational measures aimed at ensuring legality, objectivity of processing, transparency, limitation of purpose, minimization, accuracy, limitation of the storage period of data, integrity, confidentiality and is in full compliance with all the principles that should govern the process of personal data of Shareholders, according to the provisions of the GDPR and the applicable legal framework. At the same time, IATRIKO implements the appropriate technical and organizational security measures in its systems and procedures, in order to protect the confidentiality, integrity and availability of personal data, as well as the protection of data from unauthorized or illegal processing, from accidental loss, destruction or deterioration, alteration, prohibited dissemination or access and generally from any other form of improper process.

6. Shareholders' rights as data subjects.

According to the provisions of Articles 15-22 GDPR, Shareholders as data subjects have, under certain conditions and on a case-by-case basis, the following rights:

- the right of access to the data held (Article 15 GDPR), which concern you and to receive a copy thereof,

- the right to portability of your data in a structured, commonly used and machine-readable format (Article 20 GDPR) or the right to request the transmission, transmission of such data to any other controller, provided that the process is based on consent and is carried out by automated means and without prejudice to the legal rights and obligations of IATRIKO for data retention. The exercise of the right to portability does not imply the deletion of data from the records of IATRIKO.
- the right of correction and / or the right of completion of incomplete data (Article 16 GDPR), if your data is not accurate and / or incomplete,
- the right to delete the personal data concerning you (right to be forgotten) (Article 17 GCP),unless the observance of the data is mandatory by law. IATRIKO has in any case the right to refuse the deletion of personal data of the Shareholder, if these are necessary for the purpose of keeping a historical file of Shareholders, as well as if the processing or keeping of the data is necessary for the establishment, exercise or support of legal its rights or the fulfillment of its obligations.
- the right to restrict processing (Article 18 of the GDPR), either because the accuracy of the data is disputed, or because the process is illegal, or because the purpose of the process was missing and provided that there is no legal reason for the retention of the data.
- the right to object at any time to the process of your personal data, including the process for the purpose of drawing up a profile (Article 21 GDPR), unless there are specific reasons according to the applicable law.
- The right of complaint to the competent Supervisory Authority (Personal Data Protection Authority), if it is considered that the rights of the Shareholders are violated in any way and that the process of the relevant data is done in violation of the current legislation, as well as the right to appeal.

It is pointed out that IATRIKO has in any case the right to refuse the satisfaction of a Shareholder request, if indicative the process is necessary for maintaining the shareholder capacity and / or holding voting rights, for exercising the rights as a shareholder of IATRIKO and / or as holder voting rights, as well as for the establishment, exercise or support of legal rights of IATRIKO, for the compliance of IATRIKO with its legal obligations or for the fulfillment of its obligations towards the Shareholders.

For the exercise of your above rights, as well as for any other information or question regarding the process of your personal data, you can contact the Data Protection Officer of IATRIKO at the following contact details:

Philadelpheos & Kefalariou 1
Kifissia, 14562
Tel. : 210 6287202, 2106287000

Fax: 210 6287050
Email: dpo@iatriko.gr

Provided that your request is well-founded and sufficiently substantiated, its satisfaction will take place within thirty (30) days of receipt, unless due to complexity or a large number of pending requests it is deemed necessary to extend the above period by two (2) additional months, at which time you will be informed accordingly. In case you consider that your rights regarding the process of your personal data are violated, you can appeal to the Personal Data Protection Authority (www.dpa.gr, Email: contact@dpa.gr).