

PRIVACY NOTICE FOR SHAREHOLDERS

1. Introduction

TITAN CEMENT INTERNATIONAL SA (hereinafter referred to as "TITAN", "we", "our" or "us"), the holding company of TITAN GROUP, takes privacy and security of your personal data very seriously. With this notice we inform individuals who are TITAN's shareholders about the processing of their personal data and the rights to which they are entitled under the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR"). We may amend this notice at any time and publish the amendments on our website. To stay up to date, please check this notice regularly.

2. Who is the controller of your personal data?

The controller of your personal data is TITAN CEMENT INTERNATIONAL SA. TITAN is a legal entity established in Belgium (company registration number 0699.936.657) and has its registered address at Rue de la Loi 23, 7th floor, box 4, 1040 Brussels, Belgium. You may contact TITAN to ask questions or exercise your rights (see Section 10 below) in relation to your personal data (a) by **mail** (sent to the attention of TITAN's Privacy Office) at TITAN's legal seat at Rue de la Loi 23, 7th floor, box 4, 1040 Brussels, Belgium or at TITAN's management seat at 12 Andrea Zakou and Michail Paridi street, MC Building, Egkomi, 2404, Nicosia, Cyprus, (b) by **email** at dataprotection@titan-cement.com or (c) by **telephone** at +30 210 2591619.

3. How do we collect your personal data?

We collect your personal data directly from you when you provide them to us. We also collect your personal data when you exercise voting or other rights attached to your shares. We also collect your personal data from third parties, such as authorized intermediaries, custodians or clearing institutions, when they provide them to us.

4. Which categories of your personal data do we process?

TITAN processes the following categories of personal data of shareholders: name, father's name, address, contact details (including email address), nationality, country and city of residence, details of shares held, voting instructions, voice and image (if recorded when you attend a meeting through webcast) as well as the unique identifier of a shareholder's account in the Athens Exchange.

5. For which reasons (legal bases) and purposes do we process your personal data?

We process your personal data to (a) comply with our **legal obligations**, (b) pursue our or a third party's **legitimate interests** (e.g., to communicate with our shareholders, to handle inheritance rights), to (c) **fulfil contractual obligations** we may have with shareholders so that we achieve the following purposes:

- a. communicate with you directly and respond to the questions you send to us;
- b. facilitate the exercise of your voting and other shareholder rights, including your participation in shareholder meetings (for example by providing passcodes for remote access, where necessary);
- c. facilitate your engagement as shareholders with TITAN;
- d. identify TITAN's existing shareholders in order to achieve any of the above purposes;
- e. to facilitate the exercise of related rights by third-party beneficiaries (e.g., inheritance rights); and
- f. perform our contractual obligations.

We will inform you in advance in case we must process your personal data for purposes other than those listed above.

We do not make decisions based on automated processing of your personal data (i.e., processing without human intervention).

6. Who has access to your personal data?

TITAN will share your personal data with third parties, such as state and regulatory agencies, where there is a legal requirement to do so. TITAN will share your personal data with authorized intermediaries, custodians, and clearing institutions, when necessary to facilitate you as shareholders. TITAN will also share the personal data of those shareholders whose shares are registered shares with third parties whom TITAN may retain from time to time to provide registrar/secretarial services.

7. Transfer of your personal data outside the European Economic Area (EEA)

TITAN will process and store your personal data within the EEA.

8. Protection and security of your personal data

TITAN implements appropriate technical and organizational measures to protect your personal data against any loss, misuse, unauthorized access, disclosure, alteration and destruction. The information systems of TITAN are protected with passwords and control mechanisms at various levels. Electronic transfer of personal data is done by using encrypted messages and strict criteria for identifying the recipient. TITAN implements procedures to deal with breaches of personal data security. Your personal data are stored in a secure database, located in the EEA and maintained only by specialists located in the EEA. Access to your personal data is granted only to those persons in TITAN Group who need it to fulfill their duties.

9. Retention time of your personal data

TITAN will keep in its records your personal data while you are a shareholder of TITAN. After TITAN has become aware that you have ceased to hold TITAN shares, TITAN may keep your personal data for the maximum period permitted by law to resolve any outstanding matters relating to your shareholding, if necessary, and to meet legal, regulatory or tax requirements. Exceptionally, we may keep your personal data for longer if necessary to establish, exercise or defend any legal action involving TITAN until such action is time-barred under the applicable law.

10. Your rights in respect of your personal data

You have the following rights in connection with your personal data (restrictions apply to some of those rights):

a. Right of Access: You have the right to request from us a free copy of your personal data processed by us and information on the processing activities (e.g., which data we process, how and for what purpose).

b. Right to Rectification: You have the right to request from us the rectification, completion or update of your personal data, if they are incorrect, incomplete or have changed.

c. Right to Erasure: You have the right to request from us the erasure of your personal data, if among other reasons, the processing is no longer necessary or legitimate or if you have revoked your consent in case the processing is based on it.

d. Right to Object: If we have processed your personal data for the performance of a task carried out in the public interest or for the pursuit of its legitimate interest, you have the right to object to the processing of your personal data, on grounds relating to your particular situation. If you exercise such right, we will cease processing your personal data, unless we demonstrate compelling legitimate grounds to continue processing your personal data or to establish, exercise or defend of legal claims.

e. Right to Restriction: You have the right to request from us to restrict the processing of your personal data, if you contest their accuracy, the processing is illegal or no longer necessary or you have objected to the processing.

f. Right to Data Portability: If we base the processing of your personal data on your consent, you will have the right to request from us to provide you with your personal data in a structured, commonly used and machine-readable format to be transferred by you or by us to another controller.

g. Right to file a Complaint: If you consider your personal data have been breached and we have failed to address your concern, you have the right to complaint with the Hellenic Data Protection Authority (www.dpa.gr), TITAN GROUP's lead supervisory authority. If you reside in the EEA, you may file a complaint with the data protection authority in the country of your residence or the data protection authority in the country where the violation of your personal data occurred. You can find the relevant supervisory authority's name and contact details under http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.