WEBSITE PRIVACY NOTICE

Welcome to our website <u>www.lamdadev.com</u> (hereinafter the «Website»).

This Website has been developed by the company with the tradename «LAMDA DEVELOPMENT S.A.» (hereinafter «LAMDA DEVELOPMENT» or «Company»), which has its registered seat at 37A Kifissias Avenue, 15123, in Athens Greece, for the provision of information and services to the users/visitors (Users) of the Website.

The Company is the Data Controller of your personal data, collected through the Website, pursuant to EU General Data Protection Regulation 679/2016 (hereinafter "GDPR") and L. 4624/2019. This Privacy Notice is provided in order to inform you on the personal data collected, to explain the way and purpose of data processing, to state any third parties with whom we share your data and finally to inform you on your rights.

What personal data do we process?

Personal data we collect and further process during your visit to the Website, are the following:

- Technical information, such as IP address, date and time of visit, type of browser and operating system, device model, and other information collected through cookies and similar technologies, which are relevant to the analysis of your visit to the Website. For more information regarding data that are collected through cookies and similar technologies, visit the <u>Cookies</u> Policy.
- If you subscribe to our newsletter, we collect your e-mail address, your name and surname, on the basis of your consent. In any case, you retain the right to withdraw your consent at any time by choosing "unsubscribe" at the email that you receive from the Company or by communicating directly with the Company through the contact details mentioned at the relevant section below.
- In case you subscribe through CAREERS (Lamda Development Careers) at the job search website of the Group Career Opportunities: Home (successfactors.eu), the set of personal data you enter will be collected and processed, such as name and surname, email address and country/ region of residence.
- If you wish to contact the Investor Relations division of the Company, through the submission of the <u>Investor Relations Contact Form</u>, we collect personal data, such as name and surname, email, telephone number, company and profession.
- If you wish to submit namely a <u>Public Grievance Form</u>, we collect personal data, such as phone number, email address and language.

Why do we process your personal data?

Within the context of the Website's use, the Company processes your data according to the following purposes and legal bases:

A. Legitimate Interest

In the aim of ensuring and fulfilling the Company's legitimate interests, the aforementioned processes your personal data mentioned above, in order to ensure the uninterrupted, proper and secure operation of our Website, maintain backup copies and safeguard business continuity issues.

Furthermore, on the basis of our legitimate interest, we manage any communication we receive from you, so that we respond directly and reliably to the messages sent to the Company's Investor Relations division through the submission of the <u>Investor Relations</u> <u>Contact Form.</u>

Moreover, it is also in our legitimate interest to process your personal data within the context of directly and effectively responding to the grievances we receive through the <u>Public Grievance Form</u>.

B. Consent

In case you wish to receive newsletter from us, you may provide your consent through the specific area on the Website, and subscribe at the relevant service. In this case, we will process the name, surname and email address you provided us with for informative and promotional purposes. You have the ability to withdraw your consent at any time, by choosing "unsubscribe" at every communication, or addressing to us a request at the contact details mentioned at the relevant section below.

Furthermore, provided that you give your consent for the use of technologies such as cookies and the local storage area of your device, your data will be stored automatically, according to the Cookies Policy of the Website, for analysis, personalization or/and advertising purposes. You may change your option regarding cookies at any time and withdraw your consent, through the Cookies Policy of the Website.

C. Contract

At last, through the section CAREERS (Lamda Development - Careers) at the job search website of the group Career Opportunities: Home (successfactors.eu), provided that you submit your personal data, following your information, the Company processes the aforementioned data under the terms described at the relevant privacy notice, with the purpose of assessment of your job application to the Company.

With whom do we share your personal data?

For the fulfillment of the aforementioned purposes, your data may be disclosed to third parties, such as:

- Website support and management companies.
- Companies that commit to Data Protection Officer duties.
- Social Media Coordinators and advertising companies.

- Other companies of the Group with which we collaborate for the fulfillment of the aforementioned purposes.
- Any other administrative, judicial, or public authority or in general to a natural or legal
 person against which, on the basis of law or judicial decision the Company has a relevant
 obligation or right to disclose such data or in general, in order to defend our legitimate
 interests.

The Company has implemented all necessary measures, in order for the personnel and its partners to be specifically authorized for these purposes and fully committed to confidentiality and legal obligations under the legislation for the collection and further processing of the aforementioned personal data.

How does the Company protect your personal data?

We have implemented all appropriate organizational and technical measures, pursuant to the applicable legal framework and technical standards, in order to safeguard that processing of data is legitimate, appropriate and secured against any non-authorized or illegal access, deletion, amendment or any other use of the data.

How long we retain your personal data?

Your personal data are retained for as long as this is required for the fulfillment of each processing purpose. Upon expiration of these terms, your personal data will be deleted, unless otherwise required under the applicable legal and regulatory framework or for the establishment, exercise or defense of legal claims.

More precisely, data that are collected through subscription to our newsletter is retained until you withdraw your consent.

Your rights

In any case, we would like to inform you that, according to the applicable legislation, you may exercise the following rights, after verification of your identity:

- right of access to your personal data, including information concerning the processing of personal data,
- right to rectification of inaccurate or incomplete personal data,
- right to erasure ("right to be forgotten"),
- right to restriction of the processing, according to law provisions,
- right to data portability, in a structured, commonly used and machine-readable format (e.g. USB), to you or to another data controller,
- right to object to the processing based on the Company's legitimate interests,

• right to withdraw your consent directly and freely by choosing "unsubscribe" at the email that you receive from the Company or by communicating directly with the Company through the contact details mentioned at the relevant section below.

You can exercise any of the abovementioned rights by submitting a written request to our Company. You can expect a reply to such a request within one (1) month following its receipt by the Company and in any case, within two (2) months, depending on the perplexity of your request or the high volume of requests received.

Furthermore, our Company is responsible for informing you, without undue delay, for any breach concerning your personal data, which may put in danger your rights and freedoms and under the condition that it doesn't fall under the exceptions provided in the law.

Contact details

You may address any questions or requests regarding the protection of your personal data within the context of the Website's performance, at personaldata@lamdadev.com.

Right to Lodge a Complaint

In case you deem that we have not duly satisfied your request and the protection of your personal data is somehow affected, you may lodge a complaint through the dedicated online portal of the Hellenic Data Protection Authority (Athens, 1-3 Kifissias Avenue, 11523 Athens, Greece | +30 210 6475600). You may find detailed guidelines on how to lodge a complaint on the DPA's website.

What happens with third party websites?

The Website provides access to third party websites through appropriate hyperlinks (links). These links are intended solely for the convenience of Users of the Website, and the websites to which they refer are subject to the respective terms of use and Privacy Policies. The display of the links is not a sign of approval or acceptance of the content of the respective websites by the webmaster, who does not bear any responsibility for their content as well as for the privacy practices or the accuracy of the website material. The Company has no control over the websites held by third parties or their content, which is accessed or made available through this Website and, therefore, the Company does not endorse, sponsor, or otherwise accept any responsibility for such websites or their content. The User bears full responsibility for browsing any third-party websites through the links provided in the Website.

You may find more information regarding the collection of cookies at the Cookies Policy.