

Privacy Notice to the Shareholders of Allwyn AG



Introduction

Allwyn AG (hereinafter **Allwyn, we** or the **Company**), a public limited liability company (*société anonyme*) governed by the laws of the Grand Duchy of Luxembourg, with registered address at 17 Boulevard F.W. Raiffeisen, L-2411 Luxembourg, Grand Duchy of Luxembourg, registered with the Luxembourg Trade and Business Register (*Registre de Commerce et des Sociétés, Luxembourg*) under number B306096, is, according to the applicable legislation, responsible (**Data Controller**) for processing your personal data in accordance with the applicable legislation and regulatory requirements.

The present Privacy Notice aims at informing you on the type of personal data that we collect about you, on the way and the purposes for which we collect your data, on the third parties with which we share such data, as well as on your rights, in order for Allwyn to comply with Regulation (EU) 2016/679 "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" (the **GDPR**) and any applicable Luxembourg data protection legislation, in the context of the 14th extraordinary general meeting of shareholders (the **EGM**) and the 26th ordinary general meeting of shareholders (the **OGM**, together with the EGM, the **General Meetings**) to be held on 12 May 2026.

Categories of Personal Data that We Collect and Process

The main categories of personal data concerning the shareholders and which the Company processes for legitimate purposes of processing include the following:

- a) Identification data and demographic data, such as identification documents (including name and surname, father's name, number of identity card or passport or other equivalent document, tax identification number, competent tax office, residence, etc.).
- b) Contact information, such as postal and e-mail address, fixed and mobile telephone number.
- c) Ownership of Allwyn shares (such as number and type of shares, any legal relationship under which the shares are held or the voting rights attached to them are exercised).
- d) Investor Account Number and Securities Account number in the Dematerialised Securities System (DSS), Shareholder Register Number.
- e) Data relating to the capacity in which the shareholder participates in the General Meetings and the relevant supporting documentation, details of the shares and of any rights they hold over such shares, information regarding any trading activity of shares.
- f) Data relating to the participation and the exercise of the voting right of the shareholder in the General Meetings, information regarding any requests addressed to the Company, signature of the shareholders and in general any information in the context of implementing the current rules on financial instruments markets.
- g) Audio-visual data of the shareholder's or their proxy holder's participation at the General Meetings, including through remote participation by teleconference via audio-visual and electronic means.

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Why We Process Personal Data

The Company collects the personal data of the shareholders, pursuant to the above and in general processes them, for the fulfilment of legitimate purposes of processing and always according to a valid legal basis which establishes the lawfulness of the processing.

Specifically, the Company processes the personal data of the shareholders in order to:

- a) Identify the shareholder.
- b) Communicate with the shareholder.
- c) Allow and facilitate the exercise of the shareholder's rights.
- d) Comply with legal obligations, as defined by the Law of 10 August 1915 on commercial companies of the Grand Duchy of Luxembourg (the **1915 Law**), the Law of 24 May 2011 on the exercise of certain shareholders' rights at general meetings of listed companies (the **2011 Law**), the Law of 6 April 2013 on dematerialised securities, Regulation (EU) 909/2014 of the European Parliament and of the Council, Commission Implementing Regulation (EU) 2018/1212, the Rulebook of the Hellenic Central Securities Depository (the **ATHEXCSD Rulebook**) and all other applicable rules and regulations related to the purposes of the foregoing legislation. Indicatively, the Company processes personal data in order to maintain its shareholders' register, disclose transactions of liable persons to the Athens Stock Exchange and monitor transactions on the Company's shares.
- e) Perform corporate actions (e.g. dividend distribution, share capital increase, transfer of shares, etc.).
- f) Exercise and defend its legal rights in order to pursue its legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subjects which require protection of personal data.
- g) Publish acts and information of the Company in the Electronic Compendium of Companies and Associations (*Recueil électronique des sociétés et associations* – **RESA**) or on the website of the Company, as required by law.
- h) Respond to requests of the shareholders, carry out requests of the shareholders in connection with the services provided by the Company (e.g. issuance of certificates, confirmations of registered shares), provide answers and clarifications to specific inquiries or requests addressed to the Company by the shareholders.
- i) Keep a historical archive of the Company's shareholders.

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Recipients

The processing of your personal data will be carried out by the competent employees of Allwyn who are duly authorised to act in order to ensure the Company's compliance with the applicable legal and regulatory framework.

The Company shall not transmit, communicate or disclose the personal data of the shareholders to any person other than:

- a) Natural persons and legal entities to which the Company assigns the execution of certain tasks on its behalf, such as, inter alia, providers of technical and support services, database management companies, file storage and recordkeeping companies, postal services providers, providers of services related to the development, maintenance and customisation of IT applications, e-mail services providers, web hosting services providers including cloud services, in general providers of services, lawyers, law firms, accountants, chartered auditors-accountants or audit firms, external advisors and collaborators of the Company.
- b) The société anonyme under the name "Hellenic Central Securities Depository S.A."(ATHEXCSD).
- c) Competent supervisory, audit, tax, independent, administrative or judicial authorities, such as the Commission de Surveillance du Secteur Financier (CSSF), RESA, and Hellenic Capital Market Commission, insofar as this is imposed by the applicable legal and regulatory framework, following relevant request or when the Company ought to submit a report with the said data, without giving you any special prior notice.
- d) Other shareholders of the Company, as appropriate, in accordance with the law.
- e) Service providers facilitating remote participation in the General Meetings through audio-visual and electronic means (teleconference), to the extent necessary for such purpose.

International Data Transfers

In the event that your personal data is transferred to countries outside the European Economic Area (EEA), the Company will ensure that appropriate safeguards are in place in accordance with the GDPR, such as standard contractual clauses approved by the European Commission or other legally recognised mechanisms.

Retention Period

The personal data will be kept by the Company for the period of time as set out by law and in general as required by law and pursuant to the legal and/or regulatory framework in force or as required for the purposes of the legitimate interests of the Company, for the exercise of claims and for the defence of the Company in case of litigation, for the pursuit of claims of the Company as well as for the performance of its contractual obligations, and in general in accordance with the applicable legal basis and the purpose of their processing.

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Your Rights

Under the GDPR, you have the following rights regarding the processing of your personal data:

- a) **Right of access:** the right to be informed, following your request, on the extent to which your personal data is being processed and to receive further information regarding the processing carried out.
- b) **Right to rectification:** the right to request the correction of inaccurate personal data or the supplementation thereof.
- c) **Right to erasure:** the right to request the deletion of your personal data, if the conditions set out in the applicable legislation are met.
- d) **Right to restriction of processing:** the right to request the limitation of processing, if the conditions set out in the applicable legislation are met.
- e) **Right to data portability:** the right to receive your personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller, if the conditions set out in the applicable legislation are met.
- f) **Right to object:** the right to object to the processing of your personal data, subject to the conditions stipulated in the GDPR for the exercise of such right.

Our Commitments

We commit to maintain your data updated and accurate, and not to publish or otherwise process data that is not required.

Contact Information

For any request regarding the processing of your data, as well as in case you ascertain that we have not observed the principles stipulated in the present Privacy Notice, we kindly ask you to address Allwyn's Investors Relations Department using the following contact details:

Website: <https://www.allwyn.com/privacy-policy> | Address: 17 Boulevard F.W. Raiffeisen, L-2411 Luxembourg, Grand Duchy of Luxembourg | Email address: privacy@allwyn.com

In case you consider that we have not properly addressed your complaint and the protection of your personal data is violated in any way, you may lodge a complaint with the Commission Nationale pour la Protection des Données (CNPD), the Luxembourg data protection supervisory authority (Website: <https://cnpd.public.lu> | Address: 15, Boulevard du Jazz, L-4370 Belvaux, Luxembourg).