“” WEBSITE PRIVACY POLICY

Effective as of September 24th, 2026

1. Introduction

This Privacy Policy explains how “Hyades WM 1 Private Company” ("HYADES", "we", "us" or "our" or the “Company”) collects, uses, stores, shares and otherwise processes personal data in connection with the “” website and related enquiries, communications and business activities.

We are committed to protecting personal data and respecting privacy rights in accordance with Regulation (EU) 2016/679 (GDPR), Greek Law 4624/2019, Greek Law 3471/2006 on privacy and electronic communications, as amended and applicable, and other applicable Greek and European Union data-protection and privacy legislation.

Your visit to this website, www.hyadesdc.com, is subject to the terms set out herein, as well as the **Terms of Use (link)**.

This Privacy Policy describes how the Company processes your Personal Data—specifically the types of data collected, how they are used in accordance with the stated processing purposes, and with whom they are shared. It also outlines the measures the Company takes to protect your data, the rights available to you regarding such processing, and how you may exercise them.

2. Data Controller

Data Controller: “Hyades WM 1 Private Company”
Registered office: 5th Klm Thessaloniki – Kalohori Thessaloniki
Country: Greece
Company/Registration No.: 195212906000
Person responsible for data-protection enquiries:
Ms Elena Papadopoulou
Email: elena@hyadesdc.com …
Where a Data Protection Officer has been formally appointed, the relevant DPO contact details will be published here.

3. Personal Data We May Collect

"Personal Data" refers to information and data relating to an identifiable natural person—that is, a person whose identity can be ascertained directly or indirectly, primarily through reference to an identifier such as, for example, full name, date of birth, residential address, telephone number, IP address, etc.

Personal data is collected during your visit to and use of the Website. The personal data we process is provided to us voluntarily, either directly by you or automatically via the Website. Creating a personal account, if so created as an option at the Website, requires you to enter or provide specific personal data. This data is provided voluntarily - an affirmative action by the data subject constitutes an explicit indication of consent to the processing. The Company collects and processes Personal Data that is necessary, appropriate, and relevant to the specific purpose of the processing. Consequently, the data collected and processed by the Company from a given user may vary depending on whether the user is a prospective employee or an employer (natural or legal person). The Company collects data—such as full name, email address, desired project details and investment involvement particulars or service seek for—in the course of creating their

account. Where the website allows for browsing as a simple visitor the data collected is limited to that gathered during such visits—provided the visitor has consented to the processing of the relevant (non-technically essential) cookies (for further information regarding cookies, **please refer to the Company's Cookie Policy [link])**. The Company does not intend to collect sensitive data concerning the user's ethnic or racial origin, sexual orientation, political, religious, or philosophical beliefs, trade union membership, genetic or biometric data, health-related data, etc. Finally, when communicating with the Company via the website's contact form, the data collected consists of the user's full name and email address as well as the nature of service or investment intended, as entered in the designated fields of the form.

3.1 Information you provide directly

- full name;
- organisation or company name;
- job title or professional role, where provided;
- email address;
- telephone number;
- information contained in messages, enquiries or correspondence;
- information provided in connection with investment, commercial, customer, supplier, partnership or other business enquiries; and
- any other personal data voluntarily provided to us.

Please do not submit special-category or highly sensitive personal data through the website unless specifically requested and there is an appropriate lawful basis.

3.2 Information collected automatically

- IP address;
- browser type and version;
- operating system and device information;
- date and time of access;
- pages viewed and navigation information;
- referring website or URL;
- approximate geographic information derived from an IP address;
- security and diagnostic information; and
- cookie identifiers and similar online identifiers.

3.3 Information obtained from third parties

Where permitted by law, we may receive personal data from business partners, professional advisers, service providers, companies or organisations with which you are associated, publicly accessible professional or corporate sources, and other persons who legitimately provide information to us. Where required, we will provide the information required by Article 14 GDPR.

4. Purposes and Legal Bases for Processing

The processing of Personal Data carried out by the Company is strictly relevant to the specific purpose pursued in each instance, as previously outlined. Thus, the processing of user data—undertaken in the context of creating a user account on the website and establishing the user's "identity"—aims to provide the services requested by the user from the Company, as well as to manage and provide technical support for the user's account. Furthermore, processing carried out in response to a contact request submitted via the

relevant website form is intended to facilitate the communication requested by the user. Finally, the processing of the relevant data is sometimes required to ensure the Company's compliance with obligations arising from applicable legal provisions, any court rulings, and the practices and policies implemented by the Company in the context of its compliance with applicable legislation, as well as for the protection against and prevention of criminal acts directed at the Company and the management of its risk exposure, including the identification of potential hackers and other unauthorized users.

Enquiries and communications
We process contact details and enquiry content to receive, assess and respond to communications. Depending on the circumstances, the legal basis may be steps at your request before entering into a contract, performance of a contract, or our legitimate interests in managing business enquiries, communications and relationships.

Investment, partnership and commercial discussions
We may process information to evaluate, discuss and administer an investment, strategic partnership, customer, supplier or other commercial opportunity. The legal basis may be pre-contractual steps, contractual necessity and/or our legitimate interests in developing and administering our business.

Website operation, administration and security
We may process technical information to operate, secure, troubleshoot, maintain and protect the website and our information systems, generally on the basis of our legitimate interests.

Legal and regulatory compliance
We may process personal data where necessary to comply with Greek, EU or other applicable law, regulatory authorities, courts or competent bodies, or for the establishment, exercise or defence of legal claims.

Analytics and optional cookies
Where analytics, advertising or other non-essential cookies or similar technologies are used, processing dependent on those technologies will occur only after any consent required by applicable law has been obtained. Consent may be withdrawn through the website's cookie-preference mechanism.

Marketing communications
Electronic direct marketing will be sent only where permitted by applicable law, including Greek Law 3471/2006. Where consent is required, it may be withdrawn at any time. You may object to direct marketing at any time.

Legal base for processing
The processing of users' Personal Data, based on the aforementioned distinctions, relies on a specific legal basis depending on the case and the purpose of the processing. Furthermore, regarding the use of certain (non-technically essential) cookies while browsing the Website, the legal basis for processing such data is consent. As for the Company's communication with a user who has submitted a request via the website's contact form, the legal basis is again consent; however, when such communication relates to the exercise of rights provided for by personal data legislation, user data is processed to ensure the Company's compliance with its legal obligations. It should be noted, of course, that the processing of registered users' data may be dictated, on a case-by-case basis, by our legitimate interests, unless the legitimate interests or fundamental rights and

freedoms of the data subject prevail over such interests. Finally, we may process user data when necessary for compliance with applicable legislation.

5. Is Providing Personal Data Mandatory?

Fields marked as mandatory must generally be completed for us to receive and respond effectively to the relevant request. If required information is not provided, we may be unable to respond, process the request or enter into the proposed business relationship. Other information is voluntary unless stated otherwise.

6. Recipients and Sharing of Personal Data

Where necessary and subject to appropriate safeguards, we may disclose personal data to:

- companies within our corporate or project structure, where applicable;
- website hosting and infrastructure providers;
- IT, cybersecurity, maintenance and technical-support providers;
- email, communications and cloud-service providers;
- CRM and business-administration providers;
- analytics providers, where enabled and lawfully used;
- professional advisers, including lawyers, accountants, auditors, consultants and financial advisers;
- potential or actual investors, financiers, strategic partners, transaction counterparties or their professional advisers where necessary for legitimate business discussions, due diligence, financing or transactions and subject to appropriate safeguards;
- public authorities, courts, regulators or law-enforcement authorities where required or permitted by law; and
- another organisation in connection with a merger, restructuring, financing, acquisition, sale or transfer of all or part of our business or assets.

Where a service provider acts as our processor, we require appropriate contractual and data-protection safeguards.

Furthermore, provided that the lawfulness of the transfer is justified, the data may be disclosed to our employees, associates, or agents who may process the data under our instructions, or to third-party companies assisting us in the provision of our services within the scope of tasks assigned to them by us (e.g., IT system maintenance). Naturally, recipients may also include any competent supervisory authority, as well as any public or judicial authority, where required by law or a court order.

Finally, the Personal Data collected by the Company as described above may be transferred to third parties in the event of a transfer of ownership or assets, or other corporate restructuring of the Company.

7. International Transfers

Some service providers, business partners or other recipients may be established outside Greece or the European Economic Area (EEA), or may process or access personal data from such countries. Transfers within the EEA remain subject to the GDPR.

Where personal data is transferred outside the EEA, we will comply with Chapter V GDPR. Depending on the circumstances, safeguards may include a European Commission adequacy decision, Standard Contractual Clauses, Binding Corporate Rules, another

safeguard recognised under Article 46 GDPR, or a derogation under Article 49 GDPR where its conditions are satisfied. Where required, supplementary technical, contractual or organisational measures will be considered.

8. Data Retention

We retain personal data only for as long as reasonably necessary for the purposes for which it was collected, including compliance with legal, accounting, regulatory and reporting obligations and the establishment, exercise or defence of legal claims.

- general enquiries: ordinarily maximum of three (3) years after resolution, unless continued retention is justified;
- ongoing or prospective commercial relationships: for the duration of the relationship or negotiations and an appropriate period afterwards;
- contractual and transaction records: for periods required under applicable Greek law;
- legal/regulatory records: for the applicable statutory period; and
- cookie-related information: according to the periods specified in the Cookie Policy.

Unless otherwise provided by law in the context of the Company fulfilling its obligations of any nature (e.g., tax obligations), data collected in connection with the creation, processing, and use of an account shall be retained for a period not exceeding three (3) years from the last use; should an account is created and in the event of account inactivity for a period of three (3) years following said last use. "Use of the account" is defined as any instance of logging into the account in question. If no login occurs after the account is created, the date of creation shall be deemed the date of last use. The processing and retention of data are conditional upon the data subject consenting—via a relevant affirmative action—to the processing of their data at the time of account creation, while also confirming the accuracy and correctness of the information provided. Upon the expiration of the aforementioned three-year period of inactivity, the account and the user's personal data are deleted from the website's database. Users may, of course, request the deletion of their data or the deletion of their account from the Company's website at any time.

9. Data Security

We implement appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. No method of transmission or electronic storage can be guaranteed to be completely secure.

10. Your Rights

Subject to the conditions and limitations of the GDPR and applicable Greek law, you may have rights of access, rectification, erasure, restriction, data portability, objection to processing based on legitimate interests, objection to direct marketing, withdrawal of consent, and—where applicable—rights concerning decisions based solely on automated processing that produce legal or similarly significant effects.

To exercise your rights, contact Ms Elena Papadopoulou at Email: elena@hyadesdc.com. We may request information reasonably necessary to verify your identity.

11. Right to Lodge a Complaint
You have the right to lodge a complaint with the competent supervisory authority. In Greece, this is the Hellenic Data Protection Authority (HDPA), Kifisias 1-3, 115 23 Athens, Greece, website: www.dpa.gr. You may contact the Authority regarding the exercise of your data-protection rights or an alleged infringement.

12. Cookies and Similar Technologies
Our website may use cookies and similar technologies for essential functionality, security, preference management, analytics and, where applicable, other optional functionality. Non-essential technologies will be used only where consent required by applicable Greek and EU law has been obtained. **See our Cookie Policy.**

13. Third-Party Websites
The website may contain links to third-party websites or services. We are not responsible for the privacy practices of independent third parties and encourage you to review their privacy information.

14. Minors
The website is primarily intended for professional, commercial and investment-related audiences and is not directed at children. We do not knowingly seek to collect children's personal data through the website.

15. Automated Decision-Making
Unless specifically stated otherwise, we do not use personal data collected through this website to make decisions based solely on automated processing, including profiling, that produce legal effects or similarly significantly affect you within Article 22 GDPR.

16. Changes to This Privacy Policy
We may update this Privacy Policy to reflect changes to processing activities, the website, services or legal requirements. The current version will be published with its 'Last updated' date. Where required, additional notice will be provided for material changes.

17. Contact
Ms Elena Papadopoulou
Data Protection Contact
Email: elena@hyadesdc .com….

Data Controller:
Hyades WM 1 P.C.
5th Klm N.R. Thessaloniki – Greece
P.C. 57009 Thessaloniki
Greece