

PERSONAL DATA MANAGEMENT POLICY

The Management of SCYTALYS S.A. recognizes the importance of the protection of natural persons with regard to the processing of their personal data as a fundamental right. In this context, SCYTALYS complies with the principles of personal data lawful processing, respects the rights and interests of the data subjects and secures that the possessed personal data are:

- collected for specified, explicit and legitimate purposes, which are stated at the Company's Data Flow Map, and are also collected after data subject's consent, when necessary;
- processed lawfully, fairly and in a transparent manner in relation to the data subject and only for the purposes for which they were collected, or for compliance with a legal obligation and/or for regularity reasons and/or for the purposes of the defence of SCYTALYS legitimate interests;
- not further processed in a manner that is incompatible with or goes beyond the specified purpose(s);
- adequate, relevant and limited to the minimum data required in relation to the specified purpose(s) for which those data are processed;
- subject to legal processing according to data subjects' rights, they are accurate, and, where necessary, kept up to date, particularly before taking critical decisions concerning the processing of their personal data;
- not retained for no longer than is necessary for the purposes for which the data were collected or for which they are further processed or for ISIH compliance with legal and regulatory requirements;
- retained secure from unauthorized access, loss or breaches; and
- transmitted to third parties provided that secure level of data protection is ensured.

All members of staff as well as third parties that process individuals' personal data on behalf of SCYTALYS shall comply with the aforementioned.

SCYTALYS ensures full compliance with all the above by:

- applying a Personal Data Management System and Information Security Management System, which covers all its activities for monitoring and controlling the implementation of this policy, as well as effectiveness assessment regarding the regulatory framework and best practices for personal data protection,
- applying procedures for satisfying the complete and effective fulfillment of data subjects' rights,
- explicitly informing data subjects regarding the processing of their personal data,
- incorporating personal data processing requirements to all business functions,
- specifying roles and responsibilities associated with personal data management,
- giving explicit directions to staff and third parties, who execute processing on behalf of ISIH, for data use and data transmission according to SCYTALYS Personal Data Management System,
- ensuring that data transmission to and processing by third parties on behalf of ISIH, complies with the regulatory framework for data protection as well as with the current policy,
- designing, adopting and monitoring a system of indicators and targets for secure and legal data management,
- investing in continuous staff training and awareness on personal data protection issues as well as in constant improvement of know-how and its sharing with the staff,

- providing all the necessary resources for ensuring Personal Data Management System effective application,
- having designated a Data Protection Officer (DPO),
- sharing the policy with all members of staff,
- continuously updating this policy according to the applicable regulatory and legislative framework.

SCYTALYS commits itself to the monitoring and compliance with the regulatory and legislative framework for continuous implementation and effectiveness improvement of its Personal Data Management System.



George Menexis
Chief Executive Officer
03/02/2025