

## Privacy Notice of the AS Grenardi Group Investor Loyalty Programme

### 1. General Terms and Conditions

1.1 Upon implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), hereinafter – Regulation, AS Grenardi Group, reg. No. 40203279291, legal address: Dēļu iela 2, Rīga, LV-1004, Latvia, (hereinafter – Controller), provides you with the transparent and fair processing of your personal data, as well as takes care of your privacy and the security of personal data.

1.2 In this Privacy Notice of the AS Grenardi Group Investor Loyalty Programme (hereinafter – Notice) you will find all information about what personal data the Controller collects and processes, for what purposes they are used, for how long they will be stored, etc. Important information for you related to your participation in the AS Grenardi Group Investor Loyalty Programme. This is to inform you that the Controller will only process your personal data for the Loyalty Programme if you have provided it to the Controller.

1.3 If you have not read and agreed to the Terms and Conditions of the AS Grenardi Group Investor Loyalty Programme (hereinafter – Terms and Conditions) and this Notice, the Controller will not be able to provide you with the opportunity to participate in the AS Grenardi Group Investor Loyalty Programme (hereinafter – Programme). The Controller will not be able to ensure the operation of the Programme and grant you the benefits of the Programme. It is important that the personal information you provide is accurate and correct. If you provide incorrect (false or erroneous) personal data or do not update it, the Controller may have difficulty in ensuring the fulfilment of the obligations of the agreement (Terms and Conditions) concluded with you (use of your Programme benefits). The Controller shall not be liable for any damages you may incur if you provide incorrect personal information. If the personal data submitted by you changes, please inform the Controller.

### 2. Controller and the Contact Information of its Data Protection Officer

2.1 The Controller for the processing of personal data shall be AS Grenardi Group (Reg. No. 40203279291), whose contact information for communication is as follows: registered office: Dēļu iela 2, Rīga, LV-1004, Latvia, e-mail: [info@grenardi.group](mailto:info@grenardi.group), phone: +371 67 796 000.

2.2 You can contact the Data Protection Officer of the Controller regarding all personal data processing and protection issues in the following ways:

By email: [info@grenardi.group](mailto:info@grenardi.group), or by post to: Dēļu iela 2, Rīga, LV-1004, Latvia.

### 3 What is Personal Data?

3.1 Personal data means any information related to an identified or identifiable natural person (“Data Subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, surname, personal identity number, identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

4. For what purpose is your personal data processed by the Controller and how, as well as what is the legal basis and deadline for the processing?

You can only register for this Programme if you invest more than EUR 500 in the initial bond offer of AS Grenardi Group. Prior to your approval for participation in this Programme, the Controller shall ascertain whether you meet the above criteria.

#### 4.1 Registration and participation in the Programme.

You can register for participation in the Programme on the website of the Controller at: [www.grenardi.group/investoriem](http://www.grenardi.group/investoriem). By registering for the Programme, you are simultaneously providing your data to the Controller and the right to process it in accordance with the amounts, types and purposes set forth in this Notice and the Terms and Conditions. Submission of your personal data in the required minimum amount is mandatory; otherwise, you will not be able to participate in the Programme (including use of the offers and benefits provided by the Controller for participation in the Programme). When registering for the Programme (by completing the application), you must confirm that you have made an initial investment in the Controller's bonds of at least EUR 500.

When registering for the Programme, a profile of the Participant of the Programme shall be created for you, based on which the Controller can identify you as a Participant of the Programme.

#### Data Categories

In order to ensure your participation in the Programme, the Controller shall process the following data: your phone number, e-mail address, personal identity number, which will be used to send you, as an investor, the information expected and due to the Participant of this Programme about changes in the Programme, information about company news or events if you have given your consent to receive such information, the receipt of parcels (for example, the time and place of receiving a gift).

Your name, personal identity number, and the amount of your contribution, to verify whether you qualify for the Programme and to monitor your continued eligibility as a Participant of the Programme. In addition, to ensure the operation of the Programme, the number of the virtual loyalty card granted to you, the purchase history and other information related to participation in the Programme and your right to use the benefits will be processed.

#### Legal Grounds for Data Processing

For the purposes of entering into and performing the Programme Participation Agreement (the Terms and Conditions) to which you are a party (Article 6(1)(b) of the Regulation) and, based on the legitimate interest of the Controller (Article 6(1)(f) of the Regulation) – analyse the effectiveness of the Programme and provide evidence that the Controller has correctly complied with the terms and conditions of the Programme.

#### Duration of Data Processing

For the entire period of the agreement on participation in the Programme and your participation in it. Data related to participation in the Programme shall be retained by the Controller for two years after your exclusion from the Programme in order to analyse the effectiveness of the Programme and provide evidence that the Controller has properly complied with the Terms and Conditions of the Programme. After this period, your data will be deleted.

#### 4.2 Administration of benefits of the Programme.

As a Participant of the Programme, you will be granted discounts on specific products or services provided in the Programme.

## Data Categories

In order to ensure that you have an opportunity to use the benefits due to you and keep records in accordance with the requirements of laws and regulations, the Controller needs to process your loyalty card number, store address, purchase date and time, product name, quantity, purchase price and benefits, discounts and their amount, payment method for purchases, payments made and payment information (bank, bank account, bank payment card data), history of offers provided to you and information on their use, as well as your telephone number to send you the code of the offer.

## Legal Grounds for Data Processing

The Agreement concluded by you for participation in the Programme and the profile of the Participant of the Programme created by you in order to fulfil the obligations of the Agreement (Article 6 (1)(b) of the Regulation) with regard to the use of benefits. In order to fulfil the legal obligations of the Controller (Article 6 (1)(c) of the Regulation), when performing accounting in accordance with the requirements of the laws and regulations of the Republic of Latvia (for example, the provisions of the Value Added Tax Law, Section 7 of the Law on Accounting etc.).

## Duration of Data Processing

Purchase data and accounting justification documents shall be stored by the Controller for 5 years from the date of the purchase transaction. Information on the benefits used by you and their calculation shall be stored by the Controller completely or partially for a maximum of 2 (two) years, subject to the limitation period arising from the laws and regulations of Consumer Rights.

### 4.3 Receipt of investor newsletters.

If, by registering for the Programme, you have agreed to receive newsletters intended for you as an investor in AS Grenardi Group, the Controller shall process your personal data in the preparation and distribution of the newsletters. The investor newsletter includes, for example, information on reports, reviews and product news. Withdrawal of consent to receive the investor newsletter shall not affect your participation in the Programme.

## Data Categories

In order to inform you about investor news, the Controller needs to process your name, surname and e-mail address. In the case of sending out offers, the Controller can use technical solutions to make sure you have received the correspondence. In some cases, the Controller will be able to see whether you were interested in the offer or not (for example, if you opened the correspondence, clicked on the offer "view the offer", etc.). In addition, the Controller may store information about the date on which you gave the Controller your consent and when you withdrew it.

## Legal Grounds for Data Processing

Your consent (Art. 6 1(a) of the Regulation) to receive investor newsletters. The legitimate interest of the Controller (Art. 6 1(f) of the Regulation) to make sure that you receive the Controller's communications and that they have been of interest to you.

## Duration of Data Processing

As long as your consent to receive the investor newsletter is valid. Information on the conditions for the granting and withdrawal of consent may be stored for a maximum of five years, taking into account the limitation period of your rights as a data subject.

#### 4.4 Examination of requests and complaints for the protection of the Controller's legitimate interests.

The Controller shall use your personal data to respond to your complaints, requests, claims and enquiries, and administer your feedback (hereinafter – Requests). The Controller may use the data obtained within the Programme as evidence of legal action of the Controller (for example, that the Controller has complied with the laws and regulations governing the processing of consumer or personal data).

#### Data Categories

In order to ensure the protection of your legal interests and process your or any other person's Requests, the Controller may process all your personal data held by the Controller listed in this Notice: name, surname, telephone number, e-mail address, city, date of birth, information, relating to your purchase history, both as a Participant of the Programme as well as without using the benefits of the participant of the Programme, as well as any other information being at the disposal of the Controller as a controller for other data processing purposes, such as to ensure the security and protection of legal interests of the Controller and third parties.

#### Legal Grounds for Data Processing

Fulfilment of the Controller's legal obligations (Article 6(1) (c) of the Regulation) with regard to the processing of your claims (for example, Consumer Rights Protection Law). Protection of the legitimate interests of the Controller (Article 6(1) (f) of the Regulation) to evaluate your feedback as a customer, retain information about the processing of the Request in accordance with the procedure of the laws and regulations, and provide evidence. Protection of the legitimate interests of the Controller (Article 6(1) (f) of the Regulation) with respect to providing evidence on the provision of news of the Programme (your consent, the conditions for its withdrawal), the handling of claims or complaints.

#### Duration of Data Processing

Your data will only be used to protect the legal interests of the Controller. Your data will be stored by the Controller for the period specified in the Notice, but for no longer than five years unless there is a dispute (in this case, the Controller may store your data for longer until the statutory time limitation periods for filing a complaint or claim expires and/or the final decision enters into force).

#### 5. From What Sources Does the Controller Obtain and Collect Your Personal Data?

The Controller collects almost all of your personal data from you or the equipment you use. When you register for the Programme, you submit your data to the Controller. When purchasing goods or services by using our profile and using an identifier (virtual loyalty card), the Controller receives your purchase data. The Controller shall collect and process the information reflecting your participation in the Programme in order to achieve the purposes of data processing set forth in this Notice. The Controller shall obtain data from you if you submit a Request in the manner specified in the Notice. In some cases, it may be necessary for the Controller to obtain additional information in order to process your Request. In such cases, the data of your Request may be linked by the Controller to the data available at the disposal of the Controller and/or the data collected during the processing of your Request (for example, the Controller may review the purchase transaction data, usage history of your profile as the Participant in the Programme, interview the staff of the Controller, etc.).

#### 6. How Does the Controller Store and Destroy Data?

The Controller shall ensure that your data is only accessed by authorised persons and only processed in countries of the European Union or the European Economic Area that ensure the adequate protection of your rights and freedoms. At the end of the processing and storage period of your data set forth in this Notice, the Controller shall destroy (anonymise) your data as soon as possible, within a reasonable period of time, and within the time limits set out earlier.

## 7. In What Cases Will the Controller Disclose Your Data and to Which Personal Data Recipients?

The Controller may transfer your data for processing to personal data processors, i.e., persons who help the Controller to execute and administer the Programme, and provide the Controller with the services related to the administration of Requests. Such persons can be a courier who will deliver a gift planned in the Programme to you, IT database software maintainers, database administration service providers, etc. In any case, the Controller shall only provide data processors with the volume of data necessary to perform a specific task or provide a specific service. Data processors attracted by the Controller may only process your personal data according to the instructions of the Controller, and they may not use them for other purposes or transfer them to other parties without the consent of the Controller. Besides, they must ensure the protection of your data in accordance with the applicable laws and regulations and the relevant conditions specified in the agreements concluded between the Controller and the respective service provider. The data may also be disclosed to competent/supervisory and law enforcement authorities, such as the police, prosecutor's office, court in the cases and in the manner prescribed by law, as well as to the Controller's auditors.

Data may only be transferred if it is necessary and justified in accordance with the applicable laws and regulations or in order to ensure the rights of the state, local governments or law enforcement agencies and/or the Controller, the security of the Controller's customers, employees and IT resources, to raise, submit and defend the legal interests of the Controller, etc.

## 8. What Are Your Rights and How Can You Exercise Them?

You may freely exercise your rights as a data subject by turning to the Controller. The Controller shall give you the opportunity to use them. Information on your specific rights and how to exercise them is provided by the Controller in this Notice; please read them carefully:

### 8.1 Right to access your personal data processed by the Controller.

You have a right to receive information about whether the Controller processes your personal data. You have the right to become acquainted with your personal data processed by the Controller and information about the purposes of data processing, categories of data to be processed, categories of data recipients, data processing period, sources of acquisition of data, automated decision-making, including profiling, as well as their meaning and consequences. The majority of this information is provided by the Controller in this Notice. If you are a participant in the Programme, you may become acquainted with your personal data processed by the Controller in your profile at any time. If the information provided in this Notice or the profile of the Participant in the Programme is not sufficient for you (or you wish to receive the purchase operation history), you may turn to the Controller using the methods specified in this Notice.

### 8.2 Right to request the rectification of personal data.

If the personal data provided at the time of your registration in the Programme has changed or you find that the information processed by the Controller about you is inaccurate or incorrect, you have the right to request that this information be clarified or rectified. In order to exercise this right, you can independently correct your personal data in the profile of the Participant in the Programme or by contacting the Controller using the methods specified in this Notice.

### 8.3 Right to withdraw consent.

If the Controller processes your data on the basis of the consent provided by you (in the case referred to in Paragraph 4.3 of this Notice), you have the right to withdraw your consent at any time. In such a case, the data processing based on your consent will be terminated. Withdrawal of consent shall not affect the lawfulness of processing, which is based on the consent before withdrawal. For example, you may withdraw your consent to receive the news of the Programme at any time. Withdrawal of consent will not restrict your participation in the Programme, but the Controller will not be able to provide you with current news through the specified communication channel. Besides, the withdrawal of consent does not affect the fact that you will be able to receive up-to-date information such as official public market statements and reports on the website of the Controller, as well as the NASDAQ Riga website and other resources. You may change your consent by contacting the Controller in the manner set forth in this Notice. If your consent expires, the Controller shall delete the data unless there is another legal basis for processing it, and in the cases specified in the Notice – shall permanently anonymise the data.

### 8.4 Right to lodge a complaint.

If you consider that the Controller is processing your data in violation of regulatory requirements, please turn to the Controller in the ways specified in this Notice. If you are not satisfied with the proposed solution to the problem, you have the right to submit a complaint to the personal data protection supervisory authority of the Republic of Latvia – the Data State Inspectorate (address: Elijas iela 17, Riga, LV-1050, e-mail: [pasts@dvi.gov.lv](mailto:pasts@dvi.gov.lv); telephone: 67223131).

### 8.5 The right to object to the processing of data on the basis of our legitimate interests.

You have the right to object to the processing of your personal data if the personal data is processed on the basis of the legitimate interests of the Controller. However, taking into account the objectives of the Programme and the balance of legitimate interests of both parties, in this case, the Controller shall not be able to provide you with the opportunity to continue participating in the Programme and the concluded agreement will be terminated. If you wish to exercise the rights set out in this section, you must submit a written request to the Controller's Data Protection Officer.

### 8.6 Right to request to erase data (right to be forgotten).

In certain circumstances referred to in the laws and regulations (for example, if personal data is processed unlawfully, if the legal basis of the data processing expires, if personal data is no longer necessary for the purposes for which it was collected or otherwise processed, etc.), you have the right to request the Controller to delete your personal data. If you wish to exercise this right, please submit a written request to the Data Protection Officer of the Controller.

### 8.7 Right to request the restriction of data processing.

In certain circumstances mentioned in the laws and regulations (for example, if personal data is processed illegally, you dispute the accuracy of the data, you file objections to the

processing of data on the basis of the protection of the Controller's legitimate interests, etc.), you have the right to restrict your data processing. Due to such restrictions on data processing, it may not be possible for the Controller to provide you with all the benefits of the Programme. If you wish to exercise the rights set out in this section, you must submit a written request to the Controller's Data Protection Officer.

#### 9. How Does the Controller Handle and Process Your Requests?

To protect the customer data of the Controller from unauthorised disclosure, the Controller shall need to verify your identity upon receiving your request to provide you with your data or for the exercise of your other rights. During this inspection, the Controller has the right to send a control notice to you to your contact information available at the disposal of the Controller (in the form of a text message or e-mail), requesting to perform authorisation. If the verification procedure fails, the Controller may reject your request. Upon the receipt of your request for the exercise of any of your rights and the successful completion of the review procedure, the Controller shall provide the information requested by you as soon as possible, but no later than within one month from the date of receipt of your request. If your request is complicated, the Controller has the right to extend the above-mentioned period for another two months, informing you of such and stating the reasons for the extension. If your request is submitted by electronic communication means, the Controller will also provide a reply in the same way unless this is impossible (for example, due to the large amount of information) or if you ask to provide a reply in any other way. The Controller shall not fulfil your request if any obstacles to the execution of such a request are identified (for example, due to circumstances specified in the laws and regulations).

#### 10. How Safe is Your Data?

The Controller shall use different technologies and procedures in order to protect your personal information from unauthorised access, use, or disclosure. The Controller shall monitor to ensure that the implemented measures are appropriate and sufficient. The Controller shall request its cooperation partners to use appropriate measures to protect the confidentiality of personal data and ensure the safety of your personal information. If the information is transmitted through internet or mobile communications, the Controller cannot completely guarantee its safety; therefore, you have to independently assess the risks related to the confidentiality of the information thus transferred. The Controller recommends taking care of the security of your data. If you face any suspicious situation (for example, it seems that the Controller unreasonably requests you to enter your username, password etc.), immediately inform the Controller about such. The Controller shall ensure compliance with the principle of minimisation of personal data – the Controller does not process data that is not necessary for the Controller for the achievement of the purposes specified in this Notice.

#### 11. Validity and Changes in the Notice

This Notice shall be in force as of 25 March 2024. This Notice may be changed (supplemented, updated), and the updated version of the Notice will be placed on the website [www.grenardi.group/investors](http://www.grenardi.group/investors) .

You will always find the latest version of the Notice on the website [www.grenardi.group/investors](http://www.grenardi.group/investors) .

Upon using the contact information specified by you, you will be informed of any changes, and be invited to become acquainted with them.