

## PRIVACY POLICY

### 1. WHAT DOES THIS PRIVACY POLICY MEAN?

This Privacy Policy (hereinafter referred to as the **Privacy Policy**) provides information on how AB Akola Group processes your personal data.

### 2. ABOUT AB AKOLA GROUP

AB Akola Group, legal entity code 14803001, registered office address Subačiaus g. 5, 01302 Vilnius, email address *info@akolagroup.lt* is the data controller.

### 3. WHAT IS PERSONAL DATA?

Personal data is any information collected about a data subject by Akola Group, which may be used for identifying the data subject. Personal data includes any information, including the data subject's full name, surname, IP address, etc.

### 4. WHAT KIND PERSONAL DATA DO WE PROCESS AND WHY?

Akola Group process your personal data for the following purpose:

#### 4.1. For concluding and executing contracts / transactions with natural person and/or legal entities

For the purpose to conclude and execute contracts/transactions with legal entities, Akola Group processes the following personal data: name, surname, contact information, content of correspondence, contract details, etc.

For the purpose of concluding and executing contracts/transactions with natural persons, Akola Group processes the following personal data: name, surname, personal identification number, residential address, e-mail address, telephone number, personal account, transaction details.

This personal data is processed on the basis of the performance of a contract or a legitimate interest in the performance of an activity and is retained for a period of 10 years after the end of the contract.

#### 4.2. For sending information regarding main company events to subscribers

For the purpose to send information (notifications) regarding main company events Akola Group processes the following personal data: name, surname, e-mail address. These personal data are processed on the basis of consent and stored for 3 years after receiving the consent.

#### 4.3. When you visit social media site "LinkedIn" account

Information communicated to us when visiting our social media sites (including notifications, use of "Like" and "Follow" buttons and other communication) will be controlled by us jointly with social media managers as joint controllers.

Currently, we have the following account: LinkedIn "Akola Group". If you have any questions about how your personal data are processed on that social media site, please read their privacy policy at <https://www.linkedin.com/legal/privacy-policy> and contact the service provider directly.

#### 4.4. Management of securities accounts and payment of dividends

For the purpose of managing securities accounts and paying dividends, Akola Group processes the following personal data of shareholders: name, surname, personal identification number, number of shares held, information on when the person became a shareholder, information if a person is resident in the Republic of Lithuania. These personal data are processed on the basis of a legal obligation and is constantly updated when the list of shareholders changes.

#### **4.5. Award of scholarships**

For the purpose of awarding scholarships, Akola Group processes the following personal data of the scholarship recipient: name, surname, personal identification code, residential address, telephone number, bank account number. This personal data is processed on the basis to execute a contract and stored for 10 years after the expiry of the contract.

#### **4.6. Verification of compliance with international sanctions and restrictive measures**

The due diligence on business partners requires the completion of a business partner questionnaire and a business partner declaration. For this purpose, the Akola Group processes the following personal data: name, surname, position, signature of the person acting on behalf of the business partner, name, surname, date of birth, nationality, residential address, telephone number, e-mail address, board member: name, surname, nationality, date of birth, shareholder: name, surname, date of birth, size of shares, final beneficiary: name, surname, date of birth, nationality, percentage of ownership, and the personal data contained in the copies of the documents requested. In addition, information on the data subjects included in the checking shall be collected from publicly available sources of information, including but not limited to public registers, public media and other sources.

The personal data referred to above are processed on the basis of legitimate interest for the purpose of getting to know our partners and are kept for at least 5 calendar years from the end of the verification.

For the processing of personal data Akola Group has used the data processing tool of the Data Processor UAB "iDenfy" (legal entity code 304617621, address Gričiupio g. 7-212, LT-51372 Kaunas).

#### **4.7. Staff selection**

For the selection of candidates for vacancies, Akola Group processes the following personal data: name, surname, education, work experience and other information provided by the person in the CV and cover letter. This personal data is processed for the legitimate interest of the selection of the candidate and on the basis of your consent and is stored for 3 months from the date of recruitment.

If you are not selected for a further selection stage, the CV will be stored only with your individual consent and, in the absence of consent, destroyed within 1 month of the end of the selection process.

#### **4.8. Sending of information notices on key events to subscribers**

For the purpose of sending information notices to shareholders or other interested parties, the Akola Group processes the following personal data: name, surname, email address. This personal data is processed on the basis of consent or legitimate interest and stored for 3 years from the date of consent.

#### **4.9. Implementing statutory obligations relating to the organisation of activities**

In order to ensure the proper implementation of its obligations, the Akola Group processes the following personal data of shareholders, members of the management and supervisory bodies, final beneficiaries and other interested persons: name, surname, personal identification number, place of residence, date of election, copy of the final beneficiary's passport, information on the participation of the final beneficiary and his/her close relatives in the political activities, personal data contained in the decisions, minutes and powers of the general meeting of shareholders, the decisions, protocols and authorizations of management and supervisory bodies. Personal data are processed in the exercise of a legal obligation or legitimate interest and, in individual cases, on the basis of consent.

Personal data processed for this purpose shall be kept for the period prescribed by law.

#### **4.10. Implementing statutory obligations to detect irregularities and ensure sustainability**

In order to ensure adequate protection of whistleblowers, prevention of corruption, implementation of equal opportunities, protection of human rights and other sustainability factors, the Akola Group processes the following personal data of the persons concerned: name, surname, telephone number, e-mail address, content of the report or other informative text, evidence of the violation provided by

you: video and/or audio recordings, photograph, screenshot, communication, etc. Personal data is processed in order to comply with a legal obligation or legitimate interest.

Personal data processed for this purpose shall be kept for the period prescribed by law.

#### **4.11. Our website and cookies used**

When you visit the Akola Group website, we may place a cookie on your device. A cookie is a small file made up of letters and numbers that we place on your browser or on the hard drive of your computer or mobile device with your consent. We use different cookies for different purposes. Cookies also help us to distinguish you from other users of the website, thus ensuring a more pleasant experience and allowing us to improve the website.

We use necessary, functional, and analytical cookies. Strictly necessary cookies are essential for the proper functioning of our website. Functional and analytical cookies are designed to improve the visitor's experience on the website. The data collected by these cookies is processed on the basis of your consent.

Our website also has third-party advertising cookies, YouTube, which are used if you watch YouTube videos on the website. To watch the videos, you must allow the recording of advertising cookies. If you do not watch the videos, no cookies are set. We do not process the data collected by these cookies. You can read more about these cookies at this link: [akolagroup.lt/en/cookies/?section=advertisement](https://akolagroup.lt/en/cookies/?section=advertisement).

Some of the investor pages on our website integrate analytical tools provided by a third party, Euroland IR, to help investors analyse a company's financial performance and return on their financial investment, as well as to subscribe to the news we distribute through the exchange system. The following pages are tagged EUROLAND IR and are subject to the cookie policy at this link: [eurolandir.com/legal/cookie/](https://eurolandir.com/legal/cookie/).

You can read our Cookie Policy and the cookies we use at: [akolagroup.lt/en/cookies/](https://akolagroup.lt/en/cookies/).

Our website contains links to other third-party websites. We do not control how cookies are placed by third party websites, even if you are directed to them from our website. Therefore, if you click on a link from our website to other websites, you should check their use of cookies separately.

## **5. HOW IS YOUR PERSONAL DATA PROCESSED?**

Your personal data will be processed in accordance with the General Data Protection Regulation (**GDPR**). We will manage your personal data responsibly and securely. When identifying the means of personal data processing and in the course of such processing, the Company undertakes to implement appropriate technical and organisational measures for protecting your personal data from accidental or unlawful destruction, damage, modification, loss, disclosure or any other kind of illegal handling and to adopt proper measures taking into account the risks around your personal data processing.

## **6. WHO CAN WE DISCLOSE YOUR PERSONAL DATA TO?**

We may disclose information about you to our employees, intermediaries, service providers, such as debts administrators or debt recovery companies, archiving service providers, marketing services, IT service providers or subcontractors, if necessary for the purposes set forth in this Privacy Policy.

We may also transfer your data within the Akola Group on the basis of a legitimate interest in internal administration or on the basis of your individual consent. The companies of the group and the current organisational structure of the group can be found at: [akolagroup.lt/en/group-structure/](https://akolagroup.lt/en/group-structure/).

We may disclose your personal data to data processors who provide us with services (perform work), i. e. IT service providers, auditors, lawyers, consultants, and process your data on behalf of Company as a data controller.

Data processors will be allowed to process your personal data solely based on our instructions and only to the extent necessary. We will take all necessary steps to ensure that our data processors implement the appropriate organizational and technical measures to ensure safety and confidentiality of your personal data.

Your data may also be transferred to public bodies or institutions or other persons who are statutorily entrusted with certain functions. In addition, we may disclose your information in the following cases:

- If required to do so by law;
- In order to protect our rights or interests (including the case when your personal data is disclosed to others for debt recovery purposes);
- When intending to sell any of the Company's business or assets, we are asked to disclose your personal data to potential buyers of such business or assets;

We do not transfer your personal data to any third country except as specified in this Privacy Policy. Depending on such third country, transfer of personal data may be made on the basis of an adequacy decision (Article 45.3 of the GDPR) or on the basis of your consent (Article 49.1(a) of the GDPR) or for the performance of a contract (Article 49.1(b) or (c) of the GDPR).

## **7. WHAT ARE YOUR RIGHTS?**

This section gives information about your rights associated with the processing of your personal data by the Akola Group and about how such rights may be exercised. If you want more information about your rights or want to exercise them, please contact us at the e-mail address given in this Privacy Policy.

### **7.1. Right of access to your personal data**

For you to understand how we use your personal data and to suffer no inconvenience on that account, you may contact us at any time to ask whether any of your personal data is processed by us. If your personal data is stored or used by us in whatever way, you have the right of access to such data. For you to exercise such right, please send us your written request at the e-mail address given in this Privacy Policy. We may ask you to confirm your identity to grant your request, which should be submitted by you acting reasonably and in good faith.

### **7.2. Right to withdraw consent**

You have given us your explicit consent to process your personal data, which may be withdrawn by you at any time by sending us an e-mail at the address given in this Privacy Policy.

### **7.3. Right to request more information**

We hope you understand that it is very difficult to discuss all possible ways how personal data may be collected and used. Therefore, we endeavour to provide as clear and complete information as possible and undertake to update this Privacy Policy if changes are made to the use of personal data. Nevertheless, if you have any questions regarding your personal data use, we will be happy to answer them or to provide you with further information that we are allowed to disclose. Please contact us if you have any specific questions or have not understood the information presented in this Privacy Policy.

### **7.4. Additional rights**

Below, please find information about your additional rights that may be exercised by you as follows:

- You have the right to request us to correct any inaccuracy of your personal data. In that case, we may ask you to confirm the corrected information.
- You have the right to request us to erase your personal data. This right may be implemented in the cases described in Article 17 of the GDPR.
- You have the right to request us to restrict/refrain from processing your personal data.
- You have the right to data portability if processing of such data is carried out by automated means and we have obtained such data from you based on your consent or for the purpose of concluding the agreement. If you opt to exercise this right, we will transmit at your request a copy of the data submitted by you.

- You have the right to object to processing of your personal data pursuant to Article 21 of the GDPR.

## 8. HOW CAN YOU EXERCISE YOUR RIGHTS?

To enforce your rights, you may submit requests, complaints or claims to us in writing in any of the following ways:

- By sending an e-mail to [dap@akolagroup.lt](mailto:dap@akolagroup.lt);
- By sending a letter to Subačiaus g. 5, LT-01302 Vilnius, Lithuania;
- By arriving at Subačiaus g. 5, 01302 Vilnius, Lithuania;

We will respond to your request, complaint or claim in writing in accordance with the applicable laws and will do our best to provide you with information within the shortest time possible but in no event later than within 30 days after receiving your request.

If you contact us, we may process the data you provide to us, i.e. name, surname, email address, telephone number, date and text of the correspondence in accordance with the procedures set out in this Privacy Policy. Please note that we may need to contact you by post, email or telephone. Please notify us of any changes to your personal data.

If, following a request, complaint or demand, we have any suspicions as to the identity of the person making the request, we have the right to ask for proof of the identity of the person making the request. If we fail to provide you with the necessary information and/or should you have complaints about how your personal data are processed, you may approach your national Data Protection Authority or Lithuanian State Data Protection Inspectorate ([www.vdai.lrv.lt](http://www.vdai.lrv.lt)) by filing a complaint.

## 9. RESPONSIBILITY

You are responsible for the confidentiality of your or your children's data submitted and for ensuring that such data is accurate, correct and complete. You should inform us immediately by e-mail if changes are made to the data you have submitted. Therefore, we will not be held liable for damage resulting from your failure to provide correct or complete personal data or to give us notice of changes made to such data.

## 10. HOW WILL WE INFORM ABOUT CHANGES IN OUR PRIVACY POLICY?

We may update or amend this Privacy Policy at any time. Such updated or amended Privacy Policy will take effect from the date of being published on website of Akola Group <https://www.akolagroup.lt/en/>. You should check our website occasionally to make sure that you see the latest version of our Privacy Policy.

Each time our Privacy Policy is updated, we will inform you of all changes that we deem significant by posting them on the website. You may look at the "Date of Update" listed at the bottom to find out when the Privacy Policy was last updated.

Date of Update: 24/05/2024.