

# PRIVACY NOTICE

**EGPP a.s.**

## The purpose of this notice

The purpose of this notice is to provide information how EGPP a.s., a joint stock company existing under Czech law, Company ID No. 05531608, with its registered seat at U michelského mlýna 1535/8A, Michle (Praha 4), 140 00 Praha, the Czech Republic, registered in the Commercial Register maintained by the Municipality Court in Prague, Insert No. B 23902 ("EGPP" or "we") as a controller processes personal data of its future, existing and past shareholders ("shareholders" or "you").

## EGPP's commitment

EGPP is committed to protecting the personal data of our future, existing and past shareholders in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 ("GDPR") and any local data protection acts, if applicable.

Capitalized words not defined in this notice shall have the meaning ascribed to such words in the GDPR.

## What personal data we process

EGPP processes the following personal data about you:

- name, surname, permanent residency, address, email address, telephone number and other relevant contact details
- information related to your date of birth
- bank account details (bank name, sort-code, account number, IBAN)
- type of shares you hold, initial price, bulk share number, class of shares, series, period of issue, global share number, nominal value per share, purchase price, total nominal value, total purchase price, potential value of share
- ID number/passport number or any other government-issued identification numbers
- information related to exercising your shareholder's rights

## What are the purposes and legal grounds for processing

EGPP processes your personal data as a controller to perform its contractual obligations and to comply with legal obligations. EGPP can also processes your personal data based on its legitimate interests. The purposes and legal grounds for processing your personal data are described below:

Purpose	Legal Ground
Entering into, performance of, amending and termination of agreement on sale and purchase of shares, share award and option agreement, and similar agreements	Contractual obligations and legitimate interest

To allow you to exercise your shareholders' rights	Legal obligations, contractual obligations
Assurance of legal and regulatory compliance	Legal obligations
Defence against legal claims and prevention of fraud and other criminal activities	Legal obligations and legitimate interest
Assurance of effective communication with shareholders; send you information about your shareholdings, corporate actions, voting instructions and our shareholder meetings	Legal obligations, contractual obligations
To address any queries you raise with us	Legitimate interest

## How is your personal data collected

EGPP may collect your personal data in a variety of ways. For example, data might be obtained

- from Exponea once you have expressed your interest in participating in Exponea Growth Participation Plan and becoming a shareholder of EGPP, a.s.
- from Exponea once you have ended your employment (or similar relationship) at Exponea
- from correspondence with you, or through meetings, emails or questionnaires
- by any means through which you provide us with your personal information

## How long we keep your personal data

Generally personal data shall be kept for as long as necessary for the purpose for which it was processed. For how long EGPP will hold your personal data will as well depend on the legal basis on which your data is processed. Shall the processing be based on legitimate interest your data will be processed for as long as the given legitimate interest of EGPP is in place and shall be erased after. For data kept based on legal obligations the data retention period is prescribed by applicable legal regulations and shall be deleted once the legally prescribed time period lapses. For data processed based on performance of a contract the data is processed for the duration of the contractual relationship and for an applicable limitation period. This data is then erased after.

## With whom we share your personal data

**Exponea Group.** When necessary your personal data is shared with Exponea s.r.o., a company existing under the laws of Slovakia, Company ID No. 50 017 560, with its registered seat at Staromestská 3 811 03 Bratislava - mestská časť Staré Mesto, Slovakia, or other Exponea entities and Bloomreach entities (as these are too Exponea affiliates), mostly where particular activities are carried out by one of Exponea entities as processors for other entities of the Exponea Group. Such examples are (a) communication with shareholders, (b) sending questionnaires, (c) keeping data accurate and up-to-date.

You can assess the full list of Exponea affiliates here:

[https://exponea.com/terms-of-service/list\\_of\\_exponea\\_affiliates.pdf](https://exponea.com/terms-of-service/list_of_exponea_affiliates.pdf)

**Legal obligation and governmental authorities.** EGPP shares your personal data with different governmental authorities, institutions, agencies, or insurance companies or third-party service providers where required by law for the purpose of their regulatory tasks. We may also need to share your personal information with a regulator or to otherwise comply with the law. Besides governmental authorities in different jurisdictions, we share your personal data with third-party service providers (see below).

**Third-party service providers.** EGPP uses trusted third parties that provide EGPP with various services and act as sub processors in regard to processing of personal data of shareholders.

The sub processors EGPP shares data with operate in the following areas:

- IT tools/providers
- Communication tools
- Accounting, tax, social security and insurance
- Legal services, audit services
- Hosting

## Transfer to third countries

If third-party providers are established outside of the EU/EEA EGPP shall ensure that it cooperates only with third-party providers that are located in countries that ensure adequate levels of protection based on the European Commission's adequacy decision, or that EGPP has entered into agreements with corresponding Standard Contractual Clauses or is using other transfer mechanisms that ensure adequate safeguards with respect to the protection of privacy and fundamental rights and freedoms of individuals and, if necessary, additional measures are applied to ensure that the data subject is granted a level of protection essentially equivalent to that guaranteed by the GDPR.

## Security

**EGPP is committed to store your data securely.** Therefore, we have implemented technical and organizational security measures in an effort to safeguard the personal information in our custody and control (which do not, however, deprive you of your duty to take proper steps to secure your data). The aim is to eliminate unauthorised or unlawful processing of your personal data or the accidental, unauthorised or unlawful accessing, use, transferring, processing, copying, transmitting, alteration, loss or damage of your data. We protect your data, including but not limited to, in the following ways: using passwords and other access management and restricting access to your data (i.e. access to your personal data is granted only to those of our employees or contractors for whom the access is necessary).

## Your rights

You have the right to obtain from us **confirmation as to what personal data we process about you**. Upon your request we will provide you with access to the personal data we process about you as well as (i) the purposes of the processing, (ii) the categories of personal data concerned, (iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, (iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period (v) where your personal data are not collected from you, any available information as to their source.

You have the right to obtain from us without undue delay the **rectification of inaccurate personal data** concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

You have the **right to obtain from us the erasure** of your personal data without undue delay where you no longer wish we process your personal data on the basis of your consent. Please bear in mind that we cannot erase your personal data which we are obliged to process based on our legal obligations. Withdrawing your consent does not affect the legality of processing of your personal data prior to such withdrawal.

You have the **right to obtain from us restriction** of processing where (i) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of your personal data; (ii) the processing is unlawful and you oppose the erasure of your personal data and request the restriction of their use instead; (iii) we no longer need your data for the purposes of processing, but your personal data are required for the establishment, exercise or defence of legal claims.

You have the right to **receive your data** in a structured, commonly used and machine-readable format where your data is processed on the basis of your consent or contractual obligations and have the right to transmit such data to another controller.

If you feel that your data has been processed unlawfully, contact our Data Protection Officer who will undertake to resolve the problem. If GDPR is applicable to you have the right to lodge a complaint with our supervisory authority:

Úřad pro ochranu osobních údajů  
Pplk. Sochora 27  
170 00 Praha 7  
Czech Republic

Link: [https://www.uoou.cz/vismo/o\\_utvar.asp?id\\_u=10](https://www.uoou.cz/vismo/o_utvar.asp?id_u=10)

## Contact

If you are not satisfied with the level of information provided with the privacy notice, you can ask us about what personal information we have about you, what we use your information for, who we disclose your information to, whether we transfer it about, how we protect it, how long we keep it, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal information.

## **Data protection officer**

The companies belonging to our group designated a data protection officer whom you can contact with regard to all issues related to the processing of your personal data and to the exercise of your rights.

You can contact the data protection officer by:

Post: EGPP a.s. U michelského mlýna 1535/8A, Michle (Praha 4), 140 00 Praha, the Czech Republic

Contact form: <https://exponea.com/legal/privacy-policy/#contact-dpo>

## **Final provisions**

We may choose to make changes to this privacy notice at any time. if we decide to change this privacy notice, we will post the changes on our website and/or other places we deem appropriate.