

INFORMATION NOTICE on the processing of personal data of shareholders, natural persons, and of natural persons, representatives of shareholders, for the purpose of organizing and conducting meetings of the General Meeting of Shareholders holding ordinary shares - Class A (including Extraordinary General Meetings of Shareholders) and meetings of the Special Meetings of Shareholders holding preferred shares with priority dividend without voting rights - Class B, of **HOLDE AGRI INVEST SA** - all generically referred to as "**Shareholders' Meetings**".

1. Personal data controller:

HOLDE AGRI INVEST S.A., a joint stock company, organized and operating according to the laws of Romania, having its registered office in Bucharest, Splaiul Unirii, Nr. 16, Room 103, Office no. 3, floor 1, Sector 4, registered at the Trade Register under no. J40 / 9208/2018, Unique Identifier at European Level (EUID): ROONRC. J40 / 9208/2018, having a unique registration code 39549730, having subscribed and paid-in share capital in the amount of 43,069,796 lei, divided into 43,069,796 registered shares, of which 37,242,621 ordinary shares and 5,827,175 preferred shares with dividend preferentially without voting rights ("the **Company**"), having shares traded on SMT AeRO Premium, symbol HAI, operated by the Bucharest Stock Exchange and operating in accordance with the provisions of the Articles of Association of the Company, of the Companies Law no. 31/1990, of Law no. 24/2017 on issuers of financial instruments and market operations and of the FSA Regulation no. 5/2018 on issuers of financial instruments and market operations.

2. Categories of data subjects:

Given the applicable regulatory framework, in its capacity as personal data **Controller**, related to the organization (e.g. issuance, transmission and publication of the call), conducting the Shareholders' Meetings and, respectively, the implementation of decisions / rulings adopted by Shareholders' Meetings, **HOLDE AGRI INVEST SA** processes in good faith the personal data of the following categories of data subjects:

- Shareholders of the Company (individuals);
- Legal representatives of the Company's shareholders (legal persons or entities without legal personality);
- General or special proxies of the shareholders of **HOLDE AGRI INVEST S.A.** ;
- Individuals who are part of the Company's bodies - ex. governing bodies, administration, Advisory Board;
- Alternate shareholders' representatives (if the proxy holder is unable to fulfill their mandate);
- The individuals representing the credit institution (the provider of custody services for the shareholders of the Controller).

3. Categories of personal data:

In order to organize, convene, hold meetings of Shareholders' Meetings and implement the decisions adopted in the meetings, the Company expressly informs the data subjects, through this Information Notice, in accordance with articles 12 and 13 of the GDPR¹, about the processing (including storage)

¹ *GDPR* is the generic name for Regulation no. 679 / 27.04.2016 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, applicable from 25 May 2018, as well as the normative acts adopted in Romania in order to implement the EU General Regulation.

of their personal data, under the conditions described in this Information Notice and in accordance with the GDPR.

The processed data is:

- name and surname;
- data from the identity document (identity card, passport) or from the power of attorney (as the case may be);
- the quality held by the data subject, based on which the processing takes place (shareholder, legal representative of the shareholder, special or general proxy of the shareholder, authorized person of the credit institution);
- opinions, questions addressed to the Controller (according to the quality held), requests /demands e.g. requests for copies of documents, requests to complete the agenda - including the justification or the draft decision proposed for adoption by the Shareholders' Meetings;
- voting (including by correspondence);
- postal address, e-mail address, no. fax provided by the shareholder requesting copies of documents;
- bank account (if applicable – e.g. payment of dividends);
- handwritten signature and / or extended electronic signature (as appropriate).

The Company collects personal data directly from data subjects (e.g. through requests made, by the means indicated for correspondence by data subjects, from documents provided by data subjects, on the occasion of expressing the right to vote, during meetings of Shareholders' Meetings, by participation in the meeting or by correspondence) or indirectly, through DEPOZITARUL CENTRAL SA, in the form of an extract from the Register of shareholders / consolidated lists of holders of financial instruments.

4. Purposes and legal grounds for personal data processing

Personal data are processed by the Company pursuant to art. 6 paragraph 1 letter c) of the GDPR, respectively for fulfilling the legal obligations incumbent on the Controller, according to the legal framework, respectively according to the Companies Law no. 31/1990, Law no. 24/2017 on issuers of financial instruments and market operations and FSA Regulation no. 5/2018 on issuers of financial instruments and market operations, for the purposes of organizing, convening, conducting meetings of Shareholders' Meetings and implementing decisions / decisions adopted within them, in particular for:

- preparation of the call, transmission and publication of the call to ensure the right to information according to law (e.g. at the Official Gazette, newspaper, on the Controller's website, at the Bucharest Stock Exchange, Financial Supervisory Authority), including publication of the updated agenda;
- exercising the rights of the data subjects, in the capacity held within the legal relationship with the Controller, according to the constitutive act of the Company and the legal framework, in particular:
 - o the right to ask questions regarding the agenda of the Shareholders' Meeting;
 - o the right to make requests / requests to complete the agenda,
 - o the right to propose draft decisions for the items on the agenda;
 - o the right to participate in the Shareholders' Meeting;
 - o the right to have access to the location where the Shareholders' Meeting takes place;

- the right of shareholders to be informed;
- the right to vote (eg by proxy or correspondence),

including formalities related to the verification of the quality of shareholder / representative / alternate;

- other formalities related to the organization and conduct of Shareholders' Meetings (e.g. publication of Decisions / decisions of the Shareholders' Meeting);
- implementation of the decisions / decisions adopted within the Shareholders' Meetings, according to the legal provisions.

The same data will be processed for re-convening, in case of non-fulfilment of the quorum conditions provided for the first convening of a Shareholders' Meeting.

If the Company decides to process personal data for other purposes, in particular based on Article 6, paragraph 1, letter a) of the GDPR, respectively based on the consent of the data subject, the Company will perform separately and specifically the related formalities (e.g. prior information of the data subject, recording of consent, etc.).

The company will not process personal data for purposes incompatible with declared purposes.

5. Duration of personal data processing

Personal data will be stored on paper and electronically, throughout the Company's existence, in the form of meeting files of the Shareholders' Meeting.

If applicable, the data required for payment (e.g. dividends) (bank account, name, surname, address, CNP, ID card for Romanian citizens or, as the case may be, passport / residence permit for foreign citizens) will be kept on a period of maximum 10 years (duration of retention of accounting documents).

6. Processors and Recipients of the data

Personal data may be transmitted by the Controller, as the case may be, in fulfillment of the purposes, according to the law, to:

- Trade Registry Office;
- Bucharest Stock Exchange;
- Central Depository;
- Financial Supervisory Authority;
- Banking institutions;
- The newspaper chosen to fulfil the information formality, according to the law;
- Official Monitor of Romania;
- Courts or other authorities of the judiciary;
- The secretariat of the meeting of the Shareholders' Meeting and the consultants involved.

In accordance with the law, the data will be transmitted to the data subjects.

The data thus transmitted will be adequate, relevant and not excessive in relation to the purpose for which they were collected and which allows the transmission to a specific recipient.

Given the information and publication formalities required by law (e.g. Official Gazette, newspaper), the data will be accessible to the general public, strictly for information purposes, any processing of

data by unauthorized persons and / or for other purposes (eg by the public) not under the instructions / control / responsibility of the Controller.

7. Transfer of personal data:

Personal data will not be transferred to countries outside the European Economic Area.

8. The rights of the data subjects:

For complete information, as a data subject, you have the following rights with respect to your personal data, provided by GDPR, under the conditions / limits provided by GDPR:

- a) the right to information and access to your personal data,
- b) the right to rectification of your data,
- c) the right to be forgotten / the right to delete data,
- d) the right to restrict processing,
- e) the right to data portability,
- f) the right not to be subject to an individual decision, which means that you have the right to request and obtain the withdrawal, cancellation and reconsideration of any decision that produces legal effects on you, adopted exclusively on the basis of a personal data processing operation by automated means, in order to evaluate some personality traits, such as your behaviour at work,
- g) the right to notify the National Authority for the Supervision of Personal Data Processing or any competent courts.

In relation to the Controller, the rights can be exercised by a written request, signed and dated, sent to the Controller's headquarters: Bucharest, Splaiul Unirii, Nr. 16, Room 103, Office no. 3, floor 1, Sector 4 or by email at: office@holde.eu.

If the data subject addresses to the Controller a request regarding the exercise of the rights regarding the protection of personal data, the Controller will respond to this request in compliance with the provisions of the GDPR.

9. Other aspects:

The personal data Controller guarantees that it processes your data under conditions of legitimacy, while implementing adequate technical and organizational measures to ensure the integrity and confidentiality of the data according to art. 25 and 32 of the GDPR.

At the Company's level, no shareholder (natural person), or natural person (representative of a shareholder) or other person covered by the processing operations related to the Shareholders' Meetings, according to this Information Note, will be subject to a decision based exclusively on automatic processing personal data, including the creation of profiles, which would produce legal effects in relation to the data subject concerned, or which would similarly affect him to a significant extent.

Data subjects may request clarifications regarding this Information Notice at any time by means of a written request addressed to the Company at the registered office, or by email to: office@holde.eu.