

## **NOTICE ON PROCESSING PERSONAL DATA OF FORTENOVA GROUP'S SUPPLIERS, BUSINESS PARTNERS, IRREGULARITY REPORTERS AND NEW INSTRUMENT BENEFICIARIES AND THEIR REPRESENTATIVES AND ULTIMATE BENEFICIAL OWNERS AND OTHER THIRD PARTIES**

This notice on processing personal data of Fortenova group's suppliers, business partners, irregularity reporters and new instrument beneficiaries and their representatives and ultimate beneficial owners and other third parties former employees and all third parties with whom Fortenova Group comes into contact ("**Notice**") applies to the processing of personal data of Fortenova group's suppliers, business partners, irregularity reporters and new instrument beneficiaries and their representatives and ultimate beneficial owners and other third parties with whom Fortenova Group comes into contact (collectively, the "**Data Subjects**") carried out by FORTENOVA GRUPA d.d., with its registered office in Zagreb, Marijana Čavića 1 ("**Fortenova Group**")". The notification does not apply to company data or to data relating to the operations of companies.

Fortenova Group is the controller of the personal data of data subjects. In this Notice, we describe who we are, what categories of your personal data we process, how and for what purposes we process them, how we protect your personal data and what rights you have in relation to our processing of your personal data.

### **1. PERSONAL DATA OF SUPPLIERS, BUSINESS PARTNERS AND THEIR REPRESENTATIVES AND ULTIMATE BENEFICIAL OWNERS**

#### **1.1 What categories of personal data does Fortenova Group process from suppliers, business partners, their representatives and ultimate beneficial owners?**

Fortenova Group processes the following categories of personal data of suppliers and business partners of Fortenova Group and its subsidiaries and affiliates, i.e. their representatives and ultimate beneficial owners:

<b>Identification data</b>	Name, surname, OIB, name and registration number of the craft, etc.
<b>Contact Us</b>	Email address, phone number, data on residence/residence, etc.
<b>Payment information</b>	Information about the bank where the current account was opened, current account number, etc.

<b>Data related to the prevention of conflicts of interest</b>	function, occupation, scope of ownership in the person of a business partner, etc.
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## 1.2 For what purposes does Fortenova Group process the personal data of suppliers and business partners, as well as their representatives and ultimate beneficial owners?

Fortenova Group processes your personal data if you do business with us, if you use our website or if you otherwise communicate and establish business cooperation with us.

We process the personal data of our suppliers and business partners, as well as their representatives and ultimate beneficial owners, primarily for the following purposes:

### a. for the purpose of concluding and executing the contract

Fortenova Group processes the personal data of suppliers and business partners, i.e. their representatives, if they cooperate with Fortenova Group and its subsidiaries and affiliates in this capacity. In this case, Fortenova Group uses personal data for the delivery of goods, provision of services and execution of works by suppliers and business partners. Fortenova Group also processes the personal data of suppliers and business partners, i.e. their representatives, for administrative purposes, such as communication, sending invoices or payments.

It is possible that Fortenova Group will use the personal data of suppliers, business partners and their representatives to communicate with them before concluding the contract and during the contractual relationship, and to respond to questions and requests from its business partners.

For this purpose, Fortenova Group processes identification and contact data of suppliers, business partners and their representatives, as well as payment data.

In this case, Fortenova Group processes the aforementioned personal data because such processing is necessary for the conclusion and performance of the contract that Fortenova Group or its subsidiary or affiliated company enters into with suppliers and business partners, and for Fortenova Group to take appropriate actions at their request prior to concluding the contract.

### b. Fortenova Group's compliance with the regulations

In certain cases, Fortenova Group will process the personal data of suppliers and business partners in order to comply with laws and regulations, i.e. to comply with Fortenova Group's legal obligations as a controller. This applies in particular to obligations related to taxes and other charges.

Consequently, Fortenova Group may process the personal data of suppliers and business partners in order to carry out appropriate checks of suppliers and business partners and their offers, and to make a decision on the possible acceptance of the offer.

It is possible that Fortenova Group will be obliged to provide personal data of business partners to state institutions or supervisory authorities on the basis of laws and other regulations.

For this purpose, Fortenova Group may process business partners' identification data, payment data and other data provided by suppliers and business partners to Fortenova Group during the duration of the contractual relationship.

In this case, Fortenova Group processes the personal data of business partners because such processing is necessary to comply with Fortenova Group's legal obligations.

**c. in order to comply with Fortenova Group's internal compliance policies**

In certain cases, Fortenova Group will collect personal data of representatives and ultimate beneficial owners, suppliers and business partners of Fortenova Group or its subsidiaries and affiliated companies through appropriate questionnaires/forms in order to comply with Fortenova Group's internal policies and procedures relating to the prevention of conflicts of interest, sanctions, fraud prevention and ultimately to prevent financial and reputational risks and to determine the ultimate beneficial owner. This personal data will be stored in a central database at the level of Fortenova Group and its subsidiaries and affiliates, with access limited to a certain circle of persons.

For this purpose, Fortenova Group may process the identification data of the ultimate beneficial owners, as well as data on citizenship, date of birth, type and extent of beneficial ownership, etc.

In this case, Fortenova Group processes the personal data of the ultimate beneficial owners, suppliers and business partners in order to pursue a legitimate interest in effectively monitoring financial and reputational risks, sanctions and preventing conflicts of interest and fraud.

**2. PERSONAL DATA OF WHISTLEBLOWERS**

**2.1 What categories of personal data of whistleblowers does Fortenova Group process?**

Fortenova Group processes the following categories of personal data of whistleblowers in Fortenova Group and its subsidiaries and affiliated companies:

<b>Identification data</b>	Name, surname, OIB, name and registration number of the craft, etc.
<b>Contact Us</b>	Email address, phone number, data on residence/residence, etc.
<b>Other information voluntarily submitted by the whistleblower</b>	Personal data provided during oral and written communication

## 2.2 For what purposes does Fortenova Group process the personal data of whistleblowers?

Fortenova Group processes the personal data of whistleblowers in order to comply with laws, other regulations and internal acts of Fortenova Group and its subsidiaries and affiliates, i.e. to comply with Fortenova Group's legal obligations as a controller. This applies in particular to obligations under the Whistleblower Protection Act.

It is possible that Fortenova Group will be obliged to submit the personal data of whistleblowers to state institutions or supervisory authorities on the basis of laws and other regulations.

In this case, Fortenova Group processes the personal data of the whistleblower because such processing is necessary to comply with Fortenova Group's legal obligations.

## 3. PERSONAL DATA OF THE HOLDER OF NEW INSTRUMENTS

### 3.1 What categories of personal data of holders of new instruments does Fortenova Group process?

Fortenova Group processes the following categories of personal data of holders of new instruments, i.e. their representatives:

<b>Identification data</b>	Name, surname, OIB, name and registration number of the craft, etc.
<b>Contact Us</b>	Email address, phone number, data on residence/residence, etc.

### 3.2 For what purposes does Fortenova Group process the personal data of the holders of new instruments?

Fortenova Group processes the personal data of the holders of new instruments who, as Creditors of Incompletely Collectible Claims pursuant to Art. 5.1 Settlements adopted in the Extraordinary Administration Procedure over Agrokor d.d. and its subsidiaries and/or related companies (the "Settlement Plan") received a set of instruments consisting of new equity and structurally subordinated convertible bonds and thus became the Holders of the New Instruments, i.e. the economic owners of the New Group as defined in the Settlement Plan. Fortenova Group processes the data of the aforementioned holders of new instruments for the purpose of keeping internal records and keeping transcripts of meetings.

In certain cases, Fortenova Group will process the personal data of the holders of new instruments in order to comply with laws and other regulations, i.e. to comply with Fortenova Group's legal obligations as a controller. This applies in particular to liabilities under the Settlement Plan.

It is possible that Fortenova Group will be obliged by law and other regulations to submit the personal data of the holders of the new instruments to state institutions or supervisory authorities.

In this case, Fortenova Group processes the personal data of the holders of new instruments, as such processing is necessary to comply with Fortenova Group's legal obligations.

#### **4. PERSONAL DATA OF FORMER EMPLOYEES**

##### **4.1 What categories of personal data of former employees does Fortenova Group process?**

Fortenova Group processes personal data of former employees, which it is obliged to keep in accordance with legal regulations (identification data, salary data and other data from employment contracts).

##### **4.2 For what purposes does Fortenova Group process the personal data of former employees?**

Fortenova Group processes the personal data of former employees in order to comply with the law, other regulations, i.e. to comply with Fortenova Group's legal obligations as a data controller. This applies in particular to liabilities based on tax and accounting regulations and other public charges.

#### **5. PERSONAL DATA OF THIRD PARTIES CONTACTING FORTENOVA GROUP**

##### **5.1 Which categories of personal data of third parties contacted by Fortenova Group processes?**

Fortenova Group processes the following categories of personal data of third parties with whom it comes into contact, such as visitors to Fortenova grupa d.d.:

<b>Identification data</b>	Name and surname, employer
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##### **5.2 For what purposes does Fortenova Group process the personal data of third parties with whom it comes into contact?**

Fortenova Group processes data for the purpose of legitimate interest, i.e. protection of property and security during the control of entry to the Company's premises.

#### **6. HOW LONG DOES FORTENOVA GROUP KEEP THE PERSONAL DATA OF DATA SUBJECTS?**

Fortenova Group keeps the personal data of data subjects (including their representatives and ultimate beneficial owners) for the period necessary to achieve the purposes described above.

Fortenova Group keeps the aforementioned personal data within the time limits prescribed by law and other regulations, and in certain cases as far as is reasonable and advisable in the context of the applicable limitation period.

There is a possibility that Fortenova Group will be obliged to permanently store some personal data of data subjects, as provided for in Fortenova Group's internal acts and applicable regulations.

Personal data retention periods and other personal data retention rules are determined by the Company's internal acts.

Fortenova Group will keep the personal data of the data subject accurate and up-to-date, based on the data provided to Fortenova Group by the data subject or the legal representative of the legal entity in which the data subject is the ultimate beneficial owner.

Upon the expiry of the time required or prescribed for the processing of personal data, Fortenova Group will securely delete or destroy the personal data of the data subject.

## **7. WHO HAS ACCESS TO THE PERSONAL DATA OF THE DATA SUBJECT?**

Access to the personal data of data subjects may be granted to Fortenova Group employees who have limited rights of access and data processing for the purpose of performing the tasks of their workplace, in particular employees employed in the Group's Legal Affairs and Compliance Area, the Finance and Accounting Area, the Group Corporate Security Area and the Investor Relations Area.

Fortenova Group employees who are authorised to access or otherwise process the personal data of data subjects are obliged to maintain the confidentiality of personal data and to act in accordance with Fortenova Group's privacy notices, policies, procedures and other internal acts and contractual commitments.

To the extent necessary and permitted by law, in order to achieve the purposes for which the personal data was collected and/or processed, Fortenova Group may share it with third party recipients such as:

- a. service providers, who provide us with certain services on the basis of special contracts, which may also include the processing of personal data of Fortenova Group's business partners, e.g. providers of accounting, legal or IT services, etc.
- b. public authorities or privately owned legal entities, when Fortenova Group is obliged to provide personal data of data subjects on the basis of a legal obligation or when it is necessary for Fortenova Group to protect its rights and interests.

In some cases, personal data may be transferred to certain departments of Fortenova Group's subsidiaries and affiliates, as well as to countries outside the European Union and the European Economic Area, which have different and possibly lower standards of personal data protection than those prescribed in the Republic of Croatia. In such a case, Fortenova Group will take appropriate protection measures to ensure adequate protection of your personal data. Such safeguards include concluding contracts in accordance with the forms approved for this purpose by the European Commission (using so-called standard contractual clauses for the transfer of personal data to third countries).

## **8. HOW IS THE PERSONAL DATA OF DATA SUBJECTS PROTECTED?**

In order to protect the personal data of data subjects, Fortenova Group takes appropriate protection measures that are in accordance with the applicable privacy and data protection regulations.

This includes a requirement for Fortenova Group's service providers to implement appropriate measures to protect the confidentiality and security of data subjects' personal data.

In its operations, Fortenova Group has implemented technical, physical and organizational measures to protect the personal data of data subjects from accidental or unlawful destruction, accidental loss, damage, alteration, unauthorized disclosure or access, and from all other forms of unlawful and/or excessive processing.

## **9. WHAT ARE THE RIGHTS OF DATA SUBJECTS AND HOW CAN THEY BE EXERCISED?**

Within the framework of personal data protection, data subjects have the following rights:

- a. the right to access their personal data, i.e. the right to request confirmation as to whether their personal data is being processed and, if such data is being processed, the right to request access to and information about the processing and a copy of the personal data being processed;
- b. the right to rectification of inaccurate and incomplete data;
- c. the right to erasure of personal data, in particular if such data are no longer necessary in relation to the purposes for which they were collected, if they have been unlawfully processed, if there is an obligation to erase them in order to comply with legal obligations, or if you have withdrawn your consent;
- d. Right to data portability
- e. the right to restrict the processing of personal data;
- f. the right to object to the processing of personal data;
- g. the right to lodge a complaint with the Personal Data Protection Agency.

Fortenova Group will take all measures to enable data subjects to exercise the above rights, but in certain cases the exercise of these rights may be limited or excluded, for example when the exercise of any of the data subjects' rights in a particular case would be contrary to Fortenova Group's legal obligation.

## **10. WHO CAN YOU CONTACT WITH QUESTIONS ABOUT PERSONAL DATA PROTECTION?**

For any additional information, feel free to contact Fortenova Group or Fortenova Group's Data Protection Officer via email at: [zastita.podataka@fortenovagrupa.hr](mailto:zastita.podataka@fortenovagrupa.hr).

## **11. AMENDMENT OF THE NOTICE AND CONSOLIDATED VERSION**

The Notice on the processing of personal data is updated regularly. The current version applies from 24.02.2026 and is available at the link [https:// www.fortenovagrupa.hr](https://www.fortenovagrupa.hr) and at the address of Fortenova Group's headquarters.



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