

NOTICE ON THE PROCESSING OF PERSONAL DATA EMPLOYEES, DIRECTORS/MEMBERS OF THE MANAGEMENT BOARDS AND SUPERVISORY BOARDS OF SUBSIDIARIES AND AFFILIATES OF FORTENOVA GROUP

This Notice on the processing of personal data of employees, directors/members of the management boards and supervisory boards of Fortenova Group's subsidiaries and affiliates (the "**Notice**") applies to the processing of personal data carried out by Fortenova grupa d.d., with its registered office in Zagreb, Marijana Čavića 1 ("**Fortenova Group**"). The term "**Employee**" in this Notice means all employees (for a definite or indefinite period of time), as well as all other persons performing tasks for any of Fortenova Group's subsidiaries and affiliates (the "**Company**") without employment (professional training without employment, work contract, copyright contract, etc.).

As Fortenova Group is the parent company in relation to its subsidiaries and affiliates, Fortenova Group acts as the controller of the personal data of employees, directors/members of the management boards and supervisory boards of its subsidiaries and affiliates (collectively, the "**Data Subjects**").

In this Notice, we describe who we are, what categories of personal data we process, how and for what purposes we process them, how we protect personal data and what rights data subjects have in relation to our processing of their personal data.

1. PERSONAL DATA OF EMPLOYEES AND DIRECTORS/MEMBERS OF THE MANAGEMENT BOARDS OF FORTENOVA GROUP COMPANIES

1.1. What categories of personal data does Fortenova Group collect and process?

Fortenova Group collects the following categories of personal data of employees and directors/members of the Management Boards of Fortenova Group companies:

Identification data	Name, surname, OIB, gender, date, place and country of birth, citizenship, data on residence, etc.
Contact Us	Email address, phone number, data on residence/residence, etc.
Information on qualifications and work experience	Information on personal education, special knowledge, skills and abilities, other information stated in the CV of employees, directors/members of management boards, other documents (e.g. diplomas, certificates, etc.), etc.

Data related to the employment relationship	Data on seniority, pension insurance, health insurance, dependent family members, records of working hours, data on absenteeism from work, etc.
System data	IP addresses, usernames for access to IT systems, data on website visits, data on logins to IT systems, addresses of network interfaces, data on activities over business data (deletion, copying, modification, switching to external media...), data on communication made via official e-mail, etc.
Data for the calculation and payment of salary and other benefits	Information about the bank where the current account was opened, current account number, etc.
Other information voluntarily provided by the employee or director/member of the management board of companies	Personal data provided during oral and written communication
Data related to the prevention of conflicts of interest	Information on ownership shares, employment and functions in other legal entities, data on family members, data already available to the controller on the basis of employment, etc.

The personal data that Fortenova Group collects about employees and directors/members of the management boards of Fortenova Group companies may include certain special categories of personal data such as health data (e.g. data on incapacity for work due to illness), data on trade union membership (with the consent of the employees and directors/members of the management boards of the companies and if the latter provides such data), photographs with consent, and the like.

1.2. For what purposes does Fortenova Group process personal data?

Fortenova Group processes personal data of employees and directors/members of the management boards of Fortenova Group companies:

a. for data consolidation by Fortenova Group and adequate human resources management

Through the HRnet application, Fortenova Group processes data on employees employed by Fortenova Group, employees employed by Fortenova Group companies and directors/members of the Management Boards. Through the application, Fortenova Group has access to the personnel records of employees and directors/members of the management boards of all Fortenova Group companies. In addition, Fortenova processes employees' personal data outside the application, for the purpose of

efficient human resources management and for the purpose of organizing processes related to labor law issues.

For this purpose, Fortenova Group processes the identification and contact data of employees and directors/members of the management boards of Fortenova Group companies, data on their qualifications and work experience, and data related to their employment with Fortenova Group, as well as data for the calculation and payment of salaries and other benefits.

In this case, Fortenova Group processes the personal data of employees and directors/members of the management boards of Fortenova Group companies because such processing is necessary for the purpose of achieving Fortenova Group's legitimate interest to adequately manage the human resources of Fortenova Group as the parent company, which includes organising processes related to the establishment and termination of employment relationships and the legitimate interest in the transfer of personal data between the companies and Fortenova Group (as a group) undertaking) for internal administrative needs.

b. to promote Fortenova Group and its companies

Fortenova Group processes personal data of employees and directors/members of Fortenova Group companies (including their photographs) for the purpose of promoting Fortenova Group and its companies through printed (brochures, leaflets, posters, advertisements in printed magazines, etc.) and digital promotional materials (Fortenova Group's websites, newsletters and social networks, advertising on internet portals, etc.).

Furthermore, Fortenova Group processes the personal data of employees and directors/members of the management boards of Fortenova Group companies in order to inform them about Fortenova Group's services, promotions, actions and special benefits.

For this purpose, Fortenova Group processes the identification and contact data of employees and directors/members of the management boards of Fortenova Group companies, as well as their photographs.

In this case, Fortenova Group processes the personal data of employees and directors/members of the management boards of Fortenova Group companies on the basis of their written consent given for this purpose.

c. for the purpose of keeping records and implementing status changes in Fortenova Group companies

Fortenova Group, as the parent company, processes personal data of directors/members of the Management Boards of Fortenova Group companies **for the purpose of keeping records and implementing status changes in Fortenova Group companies**, in particular in relation to the appointment and recall of directors/members of the Management Boards of subsidiaries and affiliated companies.

For this purpose, Fortenova Group processes the identification and contact details of the directors/members of the Management Boards of Fortenova Group companies, as well as data on their qualifications and work experience. These are mostly data that are publicly available in the court register of the competent commercial court.

In this case, Fortenova Group processes personal data because such processing is necessary for the purposes of achieving Fortenova Group's legitimate interest to, as the parent company, keep records of the directors or members of the management boards of Fortenova Group companies for administrative purposes and the legitimate interest in the transfer of personal data between the companies and Fortenova Group (as a group of undertakings) for internal administrative purposes.

Fortenova Group also processes the personal data in question in order to comply with Fortenova Group's legal obligations arising from the Companies Act and the Court Register Act.

d. to keep records and identify potential conflicts of interest

Fortenova Group, as the parent company, processes personal data of directors/members of the management boards of Fortenova Group companies in order to identify potential conflicts of interest and to comply with Fortenova Group's internal policies and procedures relating to the prevention of conflicts of interest and the determination of the ultimate beneficial owner.

In addition to identification and contact data, Fortenova Group processes data on ownership interests, employment and functions in other legal entities, data on family members, and the like for this purpose.

It is possible that personal data collected for the purpose of determining a potential conflict of interest 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 who need access to perform their business activities.

In this case, Fortenova Group processes personal data in order to pursue its legitimate interest in effectively monitoring risks and preventing conflicts of interest.

2. PERSONAL DATA OF MEMBERS OF SUPERVISORY BOARDS OF FORTENOVA GROUP COMPANIES

2.1 What categories of personal data does Fortenova Group collect and process?

Fortenova Group collects the following categories of personal data of members of supervisory boards of Fortenova Group's subsidiaries and affiliates:

Identification data	Name, surname, OIB, gender, date, place and country of birth, citizenship, data on residence, etc.
Contact Us	Email address, phone number, data on residence/residence, etc.
Information on qualifications and work experience	Information on personal education, special knowledge, skills and abilities, other information stated in the CV of a member of the supervisory board, other documents (e.g. diplomas, certificates, etc.), etc.

Information for the calculation and payment of compensation	Information about the bank where the current account was opened, current account number, etc.
Other information voluntarily provided by a member of the supervisory board	Personal data provided during oral and written communication
Data related to the prevention of conflicts of interest	Information on ownership shares, employment and functions in other legal entities, data on family members, etc.

2.2 For what purposes does Fortenova Group process personal data?

Fortenova Group, as a corporate governance group, processes personal data of members of the supervisory boards of Fortenova Group's subsidiaries and affiliates **for the purpose of keeping records and implementing status changes in Fortenova Group's subsidiaries and affiliates**, in particular in relation to the appointment and recall of members of the supervisory boards of subsidiaries and affiliated companies.

For this purpose, Fortenova Group processes the identification and contact data of the members of the supervisory boards of Fortenova Group's subsidiaries and affiliates, as well as data on their qualifications and work experience. These are mostly data that are publicly available in the court register of the competent commercial court.

In this case, Fortenova Group processes personal data because such processing is necessary for the purpose of achieving Fortenova Group's legitimate interest in keeping records of the members of the supervisory boards of its subsidiaries and affiliates for administrative purposes, as well as the legitimate interest in the transfer of personal data between subsidiaries and affiliated companies (as a group of undertakings) for internal administrative purposes.

Fortenova Group also processes the personal data in question in order to comply with Fortenova Group's legal obligations arising from the Companies Act and the Court Register Act.

The data is also processed **for the purpose of determining potential conflicts of interest** and for the purpose of complying with Fortenova Group's internal policies and procedures related to the prevention of conflicts of interest and the determination of the ultimate beneficial owner.

In addition to identification and contact data, Fortenova Group processes data on ownership interests, employment and functions in other legal entities, data on family members, and the like for this purpose.

It is possible that personal data collected for the purpose of determining a potential conflict of interest 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 who need access to perform their business activities.

In this case, Fortenova Group processes personal data in order to pursue its legitimate interest in effectively monitoring risks and preventing conflicts of interest.

3. HOW LONG DOES FORTENOVA GROUP KEEP THE PERSONAL DATA OF DATA SUBJECTS?

Fortenova Group retains the personal data of data subjects for the period necessary to achieve the purposes described above, 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 keep some of the personal data of the data subjects, as provided for in Fortenova Group's general acts and applicable regulations.

The deadlines for the retention of personal data of data subjects and other rules for the retention of personal data are determined by Fortenova Group's internal act.

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.

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.

4. WHO HAS ACCESS TO THE PERSONAL DATA OF THE DATA SUBJECT?

Fortenova Group's employees who have limited rights of access and data processing for the purpose of performing the tasks of their workplace may have access to the personal data of the data subjects, in particular employees employed in the Human Resources Area, the Group Legal Affairs and Compliance Area, the Group's Corporate Marketing and PR 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.

Fortenova Group will, for internal administrative purposes, transfer the personal data of the data subject to individual Fortenova Group companies, for example if it is necessary for the processing of the personal data of the data subject by Fortenova Group companies.

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 certain services to Fortenova Group on the basis of specific contracts, which may also include the processing of personal data of data subjects,

- b. state and public authorities, judicial 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,
- c. business partners, to the extent that the transfer of personal data to such persons (e.g. disclosure of contact details of employees, directors/members of the management board or supervisory board, e.g. in the case of legal advice regarding employment relations and preparation of employment documentation) is necessary for the exercise of rights and obligations arising from the employment relationship or function in Fortenova Group.

In some cases, personal data may be transferred 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).

5. 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.

6. 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. the right to restrict the processing of personal data;
- e. the right to object to the processing of personal data;
- f. 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.

7. 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.

8. AMENDMENT TO 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> and at the address of Fortenova Group's registered office.