

PRIVACY POLICY for the Insider List

Eleving Group is legally required to assist authorities in detecting, preventing and investigating possible insider dealing and unlawful disclosure of inside information, by maintaining a list of individuals with access to Eleving Group's insider information ("**Insider list**"). This Privacy policy ("**Privacy policy**") states how Eleving Group processes personal data registered in the Insider list in accordance with the EU Market Abuse Regulation No 596/2014 ("**MAR**"). If you have been requested to make a notification to the Insider list, this Privacy policy applies to you.

For the purposes of this Privacy policy, Eleving Group refers to the company registered in the Grand Duchy of Luxembourg, registration No. B174457, legal address 8-10, Avenue de la Gare, L-1610, Luxembourg, Grand Duchy of Luxembourg.

Our contact information: dpo@eleving.com

1. Personal data processed, purpose of processing and legal basis

Eleving Group will process the personal data of individuals with access to inside information in order to:

- Establish and maintain the Insider list in accordance with the MAR. For this purpose, we will process your name, surname, personal identification number, date of birth, private and work phone number, position, and home address, function and reasons for being on the Insider List and any other information as may be legally required. The processing is necessary to fulfil our legal obligations in accordance with the MAR.
- Communicate with you. Your contact information will be used to send you reminders, confirmations, and other relevant information, e.g. if you are no longer considered a person with access to insider information. This processing is necessary to comply with our legal obligations according to MAR and other applicable law, as well as our legitimate interest in being able to communicate with you.
- Protect our legitimate business interests and defend or enforce legal claims. Your information will be used where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of policies, terms, and other policies. Processing for this purpose may be necessary to defend us against or enforce legal claims. The legal basis for this processing is our legitimate interest to protect us, you and others and for us to defend against or enforce legal claims.

If the information provided by you is unclear or needs to be clarified, we may request you to provide additional information or documents.

2. Data retention

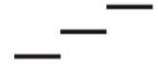
We will process your personal data as long as any of the above-mentioned data processing purposes or legal basis are still valid. For the purposes outlined herein, we are legally obligated to store your personal data as long as you have access to insider information and for a period of at least 5 years after the Insider list is established or updated.

3. Data transfer

If reasonably required, we may share your personal data with third-party service providers, who provide us with various services, which are necessary for the purposes in this Privacy policy, for example, software for the Insider list maintenance, e-mail and content delivery, legal and other services.

When we share your personal data with third-party service providers, we comply with the applicable data protection legal norms, specifically:

- we transfer only the minimum amount of data necessary for a particular third-party service provider;
- we only cooperate with service providers who can provide and ensure adequate level of personal data protection;
- if the service provider acts as our data processor, it may only process personal data in accordance with our instructions, on the basis of a written agreement, and may not use it for other purposes.



If any of the service providers are located outside the EU / EEA, we will share your data in accordance with the requirements set in the applicable personal data protection legal norms, including:

- by entering into EU standard contractual clauses or by using other appropriate grounds for data transfer provided by applicable legal norms such as codes of conduct and certifications,
- cooperating with service providers located in country, which offers an adequate level of data protection in accordance with the EC Decision.

As per applicable laws and regulations, we may be required to share information about you, for example to respond to lawful requests from law enforcement agencies, regulatory agencies, and other public and government authorities. We may also disclose information if needed to detect and prevent fraud or in connection with a legal process, to protect our rights or the rights of others. We may also share or transfer your personal data in connection with a merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

4. Your rights

As a data subject you have the rights, which are provided by applicable data protection norms, such as the General Data Protection Regulation. These rights provide that you can:

- ascertain what information we process about you, access that information and ask for clarification on data processing;
- correct false or inaccurate data;
- ask to delete your data. Please note that there may be circumstances where we may be legally entitled to retain your personal data;
- object to the processing of data, which is processed based on our legitimate interests. In the event of such an objection, we will no longer process your personal data, unless we will demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

To exercise these rights, please contact us using the e-mail address dpo@eleving.com. We will process this request within 30 days and provide an answer.

Please note that your request for restriction or erasure may affect our abilities to fulfil our legal obligations under MAR or prevent you from performing under a contract of employment, or otherwise performing tasks for us, through which you have access to inside information. Moreover, our legal rights or obligations may prevent us from disclosing or transferring all or part of your information, or from immediately deleting your information. Please contact us using the contact details at the top to exercise any of your rights.

Additionally, you have the right to file a complaint to the supervisory authority, if you believe that we have violated your data subject's rights.

The version of this Privacy policy is effective as of 1st June, 2024.