

No. 12154/11.09.2025

Infinity Capital Investments S.A.**DATA PROCESSING POLICY**

We welcome your interest in our services and would like to provide you with some important information about how we manage and protect your personal data.

Infinity Capital Investments S.A. is fully committed to protecting the privacy of the personal data of our employees, shareholders, investors, partners and suppliers. This *"Notice on the protection of individuals with regard to the processing of personal data"* is intended to help you understand what information we collect, why we collect it, and how you can update, manage, export and delete your information. The notice also contains the measures Infinity Capital Investments S.A. has put in place to protect your data, rights and freedoms.

The personal information we process falls within the scope of the General Data Protection Regulation 2016/679 (EU Regulation 2016/679), also known as GDPR, and the eprivacy Directive (2002/58/EC).

By **"infinitycapital.ro"** we mean any web page (website, landing page, subdomain, etc.) owned, managed or found under the umbrella of Infinity Capital Investments S.A.

Please check this policy regularly to ensure that you are aware of the current version. This policy may be subject to changes or updates depending on the data we process about you or subsequent legislative changes. In addition to this policy, please also see our [Terms and Conditions](#).

WHO WE ARE

Infinity Capital Investments S.A. operates as a self-administered, fully privately owned, joint-stock fixed capital company, being a stable presence on the capital market as a result of its sustained trading activity on the Bucharest Stock Exchange.

Information on Infinity Capital Investments S.A.

Address: Bucharest, Sector 1, Daniel Danielopolu Street, no. 2, 4th floor

Registration data: entered in the Trade Register under No J1993001210167, unique registration code RO4175676

Contact: public@infinitycapital.ro | infinitycapital.ro

USING OUR PLATFORM

By accessing or using any part/function of our website, you agree to be bound by the terms, conditions and policies mentioned and/or available via hyperlink.

WHERE WE COLLECT DATA ABOUT YOU

In general, the personal data we collect is provided by you through the communication channels available on our website or during a visit to our premises. We also have access to your data when you become a shareholder of Infinity Capital Investments S.A. or if you are a representative of our investors, partners or suppliers.

When we have an active recruitment process, we will collect data about you from specialised online platforms (e.g. eJobs, LinkedIn, etc.) or from CVs you send us directly or through open recruitment projects on those online platforms.

HOW WE USE PERSONAL DATA

Infinity Capital Investments S.A. will process your personal data in accordance with the EU Regulation 2016/679 of 27 April 2016 on the protection of personal data and the free movement of such data (GDPR) as a personal data controller.

Please find below the purposes for which we process your personal data, who has access to your data and how we store it:

1. Shareholder management

We process shareholder data for the purpose of fulfilling our obligations in relation to them, such as:

- Shareholder record management;
- Reporting, information and communication with shareholders;
- Current and periodic reporting;
- Calculation and payment of dividends;
- Organising General Shareholders Meetings and controlling access to these meetings;
- Organising and managing the procedures for voting in presence or by mail.

Personal data	Name, surname, domicile, ID number and series, personal numeric code, copy of the ID, mail address, telephone number, e-mail address, number of shares, dividends, payment information (account balance, bank transfer method), bank details (current account and issuing bank)
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Lawfulness of processing	<ul style="list-style-type: none"> • We process your data for fulfilling a possible contract that may arise from the relationship with Infinity Capital Investments S.A. (Art. 6/1/b of EU Regulation 2016/679). • We process your data for fulfilling legal obligations incumbent upon Infinity Capital Investments S.A. in your capacity as a shareholder (Art. 6/1/b of EU Regulation 2016/679). • We process your data in order to fulfil a legal obligation incumbent on us (Art. 6/1/c of EU Regulation 2016/679).
Who we may share your data with	<ul style="list-style-type: none"> • Depozitarul Central S.A. - storage and registry operations • Microsoft Corporation - e-mail server hosting • Mail/ courier/banking service providers • Regulatory and other state authorities, if required by legal or statutory requirements • Legal service providers or consultants in various fields (e.g. IT, data protection), external auditors. <p><i>We will only disclose your personal data to the extent strictly necessary for</i></p>

	<i>fulfilling the intended purpose.</i>
How long will we store the data	Your personal data will be stored strictly for the time necessary for fulfilling the purpose for which they were collected or for the time required for fulfilling legal obligations, in accordance with the archival nomenclature approved by the National Archives and with the legal rules applicable to the capital market.

Where is the data stored

Personal data will be kept at Infinity Capital Investments S.A. registered office, in electronic and/or paper format, as appropriate, in secure systems, for the duration of the contractual relationship, as required by the internal policies applicable at Infinity Capital Investments S.A., as well as in accordance with applicable legal requirements.

Data communicated by e-mail is stored on Microsoft servers (the e-mail service provider), located in the European Union.

2. Protecting our rights and interests or those of others

We process your personal data for establishing, exercising or defending our rights or interests or those of others. We also process your data in judicial and extrajudicial proceedings.

Personal data	<p>Name, surname, domicile, ID number and series, personal numeric code, copy of the ID, mail address, telephone number, e-mail address, number of shares, dividends, payment information (account balance, bank transfer method), bank details (current account and issuing bank)</p>
Lawfulness of processing	<ul style="list-style-type: none"> • We process your data for fulfilling a possible contract that may arise from the relationship with Infinity Capital Investments S.A. (Art. 6/1/b of EU Regulation 2016/679). • We process your data for fulfilling the legal obligations incumbent upon Infinity Capital Investments S.A. in your capacity as a shareholder (Art. 6/1/b of EU Regulation 2016/679). • We process your data in order to fulfil a legal obligation incumbent on us (Art. 6/1/c of EU Regulation 2016/679). • We process your data in order to pursue our legitimate interests (Art. 6/1/f of EU Regulation 2016/679).

Who we may share your data with	<ul style="list-style-type: none"> • Depozitarul Central S.A. - storage and registry operations • Microsoft Corporation - e-mail server hosting • Mail/ courier/banking service providers • Regulatory and other state authorities, if required by legal or statutory requirements • Legal service providers or consultants in various fields (e.g. IT, data protection), external auditors. <p><i>We will only disclose your personal data to the extent strictly necessary for fulfilling the intended purpose.</i></p>
How long will we store the data	<p>Your personal data will be stored strictly for the time necessary for fulfilling the purpose for which they were collected or for the time required for fulfilling legal obligations, in accordance with the archival nomenclature approved by the National Archives and with the legal rules applicable to the capital market.</p>

Where is the data stored Personal data will be kept at Infinity Capital Investments S.A. registered office, in electronic and/or paper format, as appropriate, in secure systems, for the duration of the contractual relationship, as required by the internal policies applicable at Infinity Capital Investments S.A., as well as in

accordance with applicable legal requirements.

Data communicated by e-mail is stored on Microsoft servers (the e-mail service provider), located in the European Union.

3. Fulfilling other legal obligations

We need your data for activities that are necessary for fulfilling our legal obligations, such as:

- Preventing and combating fraud, money laundering and terrorist financing;
- Reporting in accordance with applicable laws and/or regulations;
- Internal or external audits;
- Fulfilling other legal obligations

Personal data	Name, surname, domicile, ID number and series, personal numeric code, copy of the ID, mail address, telephone number, e-mail address, number of shares, dividends, payment information (account balance, bank transfer method), bank details (current account and issuing bank)
Lawfulness of processing	<ul style="list-style-type: none">• We process your data for fulfilling a possible contract that may arise from the relationship with Infinity Capital Investments S.A. (Art. 6/1/b of EU Regulation 2016/679).• We process your data for fulfilling the

	<p>legal obligations incumbent upon Infinity Capital Investments S.A. in your capacity as a shareholder (Art. 6/1/b of EU Regulation 2016/679).</p> <ul style="list-style-type: none"> • We process your data in order to fulfil a legal obligation (Art. 6/1/c of EU Regulation 2016/679)
<p>Who we may share your data with</p>	<ul style="list-style-type: none"> • Depozitarul Central S.A. - storage and registry operations • Microsoft Corporation - e-mail server hosting • Mail/ courier/banking service providers • Regulatory and other state authorities, if required by legal or statutory requirements; • Legal service providers or consultants in various fields (e.g. IT, data protection), external auditors. <p><i>We will only disclose your personal data to the extent strictly necessary for</i></p>

	<i>fulfilling the intended purpose.</i>
How long will we store the data	Your personal data will be stored strictly for the time necessary for fulfilling the purpose for which they were collected or for the time required for fulfilling legal obligations, in accordance with the archival nomenclature approved by the National Archives and with the legal rules applicable to the capital market.

Where is the data stored

Personal data will be kept at Infinity Capital Investments S.A. registered office, in electronic and/or paper format, as appropriate, in secure systems, for the duration of the contractual relationship, as required by the internal policies applicable at Infinity Capital Investments S.A., as well as in accordance with applicable legal requirements.

Data communicated by e-mail is stored on Microsoft servers (the e-mail service provider), located in the European Union.

4. Improving the Company's business and therefore the shareholders' experience

We process your personal data in the pursuit of our legitimate interest, in our desire to continuously improve the Company's business and the shareholders' experience, including through regular activities to analyse the shareholders' perception of the business.

Personal data	Name, surname, domicile, ID number and series, personal numeric code, copy of
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	<p>the ID, mail address, telephone number, e-mail address, number of shares, dividends, payment information (account balance, bank transfer method), bank details (current account and issuing bank).</p>
Lawfulness of processing	<ul style="list-style-type: none"> • We process your data in order to pursue our legitimate interests (Art. 6/1/f of EU Regulation 2016/679).
Who we may share your data with	<ul style="list-style-type: none"> • Microsoft Corporation - e-mail server hosting; • Legal service providers or consultants in various fields (e.g. IT, data protection), external auditors. <p><i>We will only disclose your personal data to the extent strictly necessary for fulfilling the intended purpose.</i></p>
How long will we store the data	<p>We will keep your data for as long as you remain a shareholder of Infinity Capital Investments S.A.</p> <p>At the time of ceasing to be a shareholder of Infinity Capital Investments S.A., the personal data will be destroyed and removed from all record systems, except for data that will be subject to an anonymisation procedure or that are subject to different</p>

	archiving periods imposed by applicable legal provisions.
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Where is the data stored

Personal data will be kept at Infinity Capital Investments S.A. registered office, in electronic and/or paper format, as appropriate, in secure systems, for the duration of the contractual relationship, as required by the internal policies applicable at Infinity Capital Investments S.A., as well as in accordance with applicable legal requirements.

Data communicated by e-mail is stored on Microsoft servers (the e-mail service provider), located in the European Union.

5. We process data about you when you interact with us using the contact details available on our website

When you interact with us using the contact details available on infinitycapital.ro, we will use your contact details and the data you give us, so as to provide you with information about our business, to schedule a meeting, to resolve the situation you have reported and to continuously improve the Company's business.

Personal data	Name, surname, telephone number, e-mail address, Internet Protocol (IP)
Lawfulness of processing	<ul style="list-style-type: none"> We process your data for fulfilling a possible contract that may arise from the relationship with Infinity Capital Investments S.A. (Art. 6/1/b of EU Regulation 2016/679). We process your data for fulfilling the legal obligations incumbent

	<p>upon Infinity Capital Investments S.A. in your capacity as a shareholder (Art. 6/1/b of EU Regulation 2016/679).</p> <ul style="list-style-type: none"> • In pursuit of our legitimate interest, to respond to any queries, complaints or recommendations you send us and to improve our services and the experience we provide (Art. 6/1/f of EU Regulation 2016/679).
Who we may share your data with	<ul style="list-style-type: none"> • Microsoft Corporation - e-mail server hosting • Legal service providers or consultants in various fields (e.g. IT, data protection), external auditors. <p><i>We will only disclose your personal data to the extent strictly necessary for fulfilling the intended purpose.</i></p>
How long will we store the data	<p>Your personal data will be stored strictly for the time necessary for fulfilling the purpose for which they were collected or for the time required for fulfilling legal obligations, in accordance with the archival nomenclature approved by the National Archives and with the legal rules applicable to the capital market.</p>

Where is the data stored

Personal data will be kept at Infinity Capital Investments S.A. registered office, in electronic and/or paper format, as appropriate, in secure systems, for the duration of the contractual relationship, as required by the internal policies applicable at Infinity Capital Investments S.A., as well as in accordance with applicable legal requirements.

Data communicated by e-mail is stored on Microsoft servers (the e-mail service provider), located in the European Union.

6. Processing candidates' data in the recruitment, selection and evaluation process

If you would like to join the Infinity Capital Investments S.A. team, you can apply for one of the open recruitment projects on specialised recruitment platforms (e.g. eJobs, LinkedIn etc.). Depending on the job opportunity, you can also do so by submitting your details on the contact form or by emailing public@infinitycapital.ro.

We will process the data you provide when you express your intention to join the Infinity Capital Investments S.A. team and any additional information we may subsequently request from you, in order to analyse your real potential and motivation, so that we can assess whether the information you have provided matches the employee profile we are looking for.

Important: The CV you send us must not contain sensitive data on: racial or ethnic origin, political affinities, philosophical or religious beliefs, membership of a trade union or political party, history of offences or criminal proceedings and related penalties or fines, any illegal or inappropriate behaviour and associated sanctions or any national identification number of a person.

Personal data	<p>Name, surname, domicile, e-mail address, telephone number, CV and cover letter details, previous work experience and/or relevance or other experience, education, transcripts or other information you provide in support of an application and/or the application and recruitment process.</p>
Sensitive personal and/or demographic data	<p>Sensitive and/or demographic information voluntarily provided by the candidate during the recruitment process, such as: citizenship and/or nationality information, medical or health information of the candidate, data of racial, ethnic or religious origin.</p> <p>CCTV images of you at work (in case of an on-site interview).</p>
Lawfulness of processing	<ul style="list-style-type: none"> • We process your data to assess your application before concluding a contract (Art. 6/1/b of Regulation (EU) 2016/679) • Following our legitimate interest in responding to any questions or requests you send us, in order to assess your application and choose the most suitable candidate for the job (Art. 6/1/f of EU Regulation 2016/679)

Who we may share your data with	<ul style="list-style-type: none"> • Microsoft Corporation - e-mail server hosting • Regulatory and other state authorities, if required by legal or statutory requirements • Legal service providers or consultants in various fields (e.g. IT, data protection), external auditors • Recruitment platforms (e.g. eJobs, LinkedIn etc.) <p><i>We will only disclose your personal data to the extent strictly necessary for fulfilling the intended purpose.</i></p>
How long will we store the data	<ul style="list-style-type: none"> • Your personal data will be stored strictly for the time necessary for fulfilling the purpose for which they were collected or for the time required for fulfilling legal obligations, in accordance with the archival nomenclature approved by the National Archives and with the legal rules applicable to the capital market. • Data shared with other platforms will be stored by them according to their own policies.

Where is the data stored • Personal data will be kept at Infinity Capital Investments S.A.'s registered office, in electronic and/or paper format,

as the case may be, in secure systems, for the duration of the contractual relationship, in accordance with the requirements of the internal policies applicable at Infinity Capital Investments S.A., as well as in compliance with applicable legal requirements

- Data communicated by e-mail is stored on Microsoft servers (the e-mail service provider), located in the European Union
- Data shared with other platforms will be stored by them in accordance with their own policies.

7. We process data about you when you send us a request to exercise your rights

To exercise your legal rights under EU Regulation 2016/679, we first need to identify you and process your data.

Personal data	Name, surname, e-mail address, telephone number, address, date of birth, relationship to the data subject if the application is filled-in on behalf of another person, other information you voluntarily submit to us.
Lawfulness of processing	<ul style="list-style-type: none">• We process your data to fulfil our legal obligations under GDPR (Art. 6/1/c of EU Regulation 2016/679)
Who we may share your data with	<ul style="list-style-type: none">• Microsoft Corporation - e-mail server hosting

	<ul style="list-style-type: none"> • Regulatory and other state authorities, if required by legal or statutory requirements • Legal service providers or consultants in various fields (e.g. IT, data protection), external auditors <p><i>We will only disclose your personal data to the extent strictly necessary for fulfilling the intended purpose.</i></p>
How long will we store the data	<p>Your personal data will be stored strictly for the time necessary for fulfilling the purpose for which they were collected or for the time required for fulfilling legal obligations, in accordance with the archival nomenclature approved by the National Archives and with the legal rules applicable to the capital market.</p>

Where is the data stored

Personal data will be kept at Infinity Capital Investments S.A. registered office, in electronic and/or paper format, as appropriate, in secure systems, for the duration of the contractual relationship, as required by the internal policies applicable at Infinity Capital Investments S.A., as well as in accordance with applicable legal requirements.

Data communicated by e-mail is stored on Microsoft servers (the e-mail service provider) located in the European Union.

8. Data processing as part of preventing and combating money laundering/terrorist financing and client insight

Personal data collected for the purposes of preventing and combating money laundering and terrorist financing in accordance with Law 129/2019 are kept in the company's database and updated according to any changes, in compliance with the specific legislation on personal data protection.

Infinity Capital Investments S.A. shall prepare and keep, on paper, as appropriate, commercial correspondence, client records, including copies of identification documents and other documents requested from them, measures taken to verify the accuracy of information, analyses and assessments related to the identification of each client.

Personal data	<p>Name, surname, e-mail address, telephone number, address, date of birth, pseudonym, CNP / equivalent in the case of foreign persons, place of birth, details of identity card, nationality, citizenship, occupation, name of employer, nature of own activity, permanent address, residence, publicly exposed person.</p> <p>Other personal data from identification documents.</p> <p>Personal data resulting from queries in internal IT applications or public sources.</p> <p>Personal data resulting from internal assessments and reports, correspondence, supporting documents, transaction records.</p> <p>Personal data on political exposure.</p>
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Lawfulness of processing	<ul style="list-style-type: none"> • We process your data to fulfil our legal obligations imposed by Law 129/2019.
Who we may share your data with	<ul style="list-style-type: none"> • Microsoft Corporation - e-mail server hosting • Regulatory and other state authorities, if required by legal or statutory requirements • Legal service providers or consultants in various fields (e.g. IT, data protection), external auditors <p><i>We will only disclose your personal data to the extent strictly necessary for fulfilling the intended purpose.</i></p>
How long will we store the data	<p>Your personal data will be stored for a period of 5 years after collection, in accordance with the provisions of Law 129/2019.</p>

Where is the data stored

Personal data will be kept at Infinity Capital Investments S.A. registered office, in electronic and/or paper format, as appropriate, in secure systems, for the duration of the contractual relationship, as required by the internal policies applicable at Infinity Capital Investments S.A., as well as in accordance with applicable legal requirements.

9. Use of cookies

Although the use of cookies has become standard practice, we are proof that there is life online without cookie data collection.

You can therefore browse our site safely, as we do not collect any visitor data.

IS INFINITY CAPITAL INVESTMENTS COLLECTING AND PROCESSING DATA SAFELY?

Infinity Capital Investments S.A. takes the protection of your data very seriously and applies appropriate technical and organisational measures to ensure the protection of the processed personal data, appropriate to the risks and categories of data protected. In particular, we protect the data against sharing with unauthorised persons, their processing in violation of applicable laws as well as against change, loss, damage or destruction of the data.

However, remember that, unfortunately, no data transmission is guaranteed as 100% secure.

If you suspect a breach of your privacy, please contact us immediately at: dpo@infinitycapital.ro.

Important: After the data retention period has expired, your data will be deleted. If we consider that this data could help us improve the quality of the Company's business, we will continue to use this data only after its irreversible anonymisation.

LINKS TO OTHER WEBSITES

Infinitycapital.ro may contain links to other websites that are not owned or controlled by Infinity Capital Investments S.A.

Please note that we are not responsible for the privacy practices of other websites or third parties. We encourage you to be aware when you leave our website and to read the privacy policies of each website that may collect personal information.

INTERNATIONAL DATA TRANSFER

Certain personal data categories may be stored and processed in any country in which we engage service providers. We may transfer your collected personal data to recipients in countries other than the country where the personal data was originally collected. These countries have data protection rules that are different from those in your country. However, we will take steps to ensure that any such transfers comply with applicable data protection laws and that your personal data remains protected in accordance with European standards. In certain circumstances, the courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may have the right to access your personal data.

Where applicable law requires us to ensure that an international transfer of data is governed by a data transfer mechanism, we use one or more of the following mechanisms:

- EU standard contractual clauses with a data recipient outside the EEA or the UK.
- Verification that the recipient has implemented binding corporate rules.

We will also ensure that all our international partners have taken additional measures to provide adequate safeguards, enforceable rights and effective legal remedies. The role of these measures is to provide guarantees to data subjects that the transfer of data under standard contractual clauses or binding corporate rules provides a level of protection equivalent to that guaranteed within the European Union.

YOUR RIGHTS

As a data subject, you have specific legal rights in relation to your personal data that we collect and process. Infinity Capital Investments S.A. respects your rights and ensures that we take your interests duly into account.

- **Withdrawal of consent:** If the processing is carried out based on your consent, you may withdraw your consent to the processing at any time, unless their retention is required by applicable legal rules.
- **Rectification of data:** If you notice that we hold inaccurate personal data about you, you may at any time ask us to rectify the personal data concerning you. We use reasonable endeavours to keep personal data - which is used on an ongoing basis and in our possession or control - accurate, complete, current and relevant, based on the latest information available to us.
- **Restriction of processing:** You can ask us to restrict the processing of your data if you are in one of the situations below:
 - challenge the accuracy of personal data for the period during which we need to verify the accuracy,
 - the processing is unlawful and you request restriction of processing rather than erasure of personal data,
 - we no longer need your personal data, but you request them for establishing, exercising or defending a right, or
 - object to processing during the period in which we verify that our legitimate reasons override your rights.
- **Access to your data:** You can ask us for information about the personal data we hold about you, including information about what categories of data, what it is used for, where we collected it from, if it is not collected directly from you and to whom it has been disclosed, if applicable. You can obtain a copy from us, free of charge, containing the personal data we hold about you.
- **Right to portability:** Upon request, we will transfer personal data to another controller, where technically possible, provided that the processing is necessary for the performance of a contract. Rather than receiving a copy of your personal data,

you may request that we transfer your data directly to another controller specified by you.

- **Right to erasure:** You can get us to delete your personal data if:
 - your data are no longer necessary for the purposes for which they were processed;
 - you object to the further processing of your personal data (see Right to object below);
 - the personal data have been processed unlawfully;
 - you withdraw the consent based on which the processing is taking place.

Unless processing is necessary:

- to fulfil a legal obligation that requires us to process that data;
 - in particular for legal requirements on data retention periods;
 - to establish, exercise or defend legal claims.
- **Right to object:** You can object to the processing of your personal data at any time due to your particular situation. In this case, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds and a substantial interest in the processing or for establishing, exercising or defending a right. When you object to the processing, please indicate whether you wish to have your personal data erased or the processing of such data restricted.
- **Right to lodge a complaint:** we recommend that if you have any queries or complaints about the way Infinity Capital Investments S.A. handles your personal information, you should contact our Data Protection Officer. If the information provided by our Data Protection Officer is not satisfactory or you are dissatisfied with the way Infinity Capital Investments S.A. has handled a complaint or request concerning such data, you have the right to file a complaint with the National

Supervisory Authority for the Processing of Personal Data by filling-in the online form available at: [Complaints NSAPPD](#).

Remember!

Timeframe: We will endeavour to resolve your request within 30 days. However, the period may be extended for reasons relating to the specific legal right or complexity of the request.

Restricting access: In certain situations, we may not be able to grant you access to some or all of your personal data due to restrictions provided by law. If we deny your request for access, we will tell you the reason for the denial.

Impossibility to identify: In some cases, we may not be able to identify the personal data, due to the lack of identification elements provided in the request you submit to us. In such cases, if you do not provide additional identifying information, we will not be able to fulfil your request to exercise your legal rights as described in this section.

Further information and exercising your rights

For any further information on how we process your personal data (including to exercise your above rights), please contact our **Data Protection Officer** in writing, by e-mail at dpo@infinitycapital.ro, or by sending a letter to our registered office in Bucharest, Sector 1, Daniel Danielopolu Street no. 2, 4th floor.