

PRIVACY POLICY

1. WHAT DOES THIS PRIVACY POLICY MEAN?

This Privacy Policy (hereinafter referred to as the **Privacy Policy**) provides information on how AB Akola Group processes your personal data.

2. ABOUT AB AKOLA GROUP

AB Akola Group, legal entity code 14803001, registered office address Subačiaus g. 5, 01302 Vilnius, email address *info@akolagroup.lt* is the data controller.

3. WHAT IS PERSONAL DATA?

Personal data is any information collected about a data subject by Akola Group, which may be used for identifying the data subject. Personal data includes any information, including the data subject's full name, surname, IP address, etc.

4. WHAT KIND PERSONAL DATA DO WE PROCESS AND WHY?

Akola Group process your personal data for the following purpose:

4.1. For concluding and executing contracts / transactions with natural person and/or legal entities

For the purpose to conclude and execute contracts/transactions with legal entities, Akola Group processes the following personal data: name, surname, contact information, content of correspondence, contract details, etc.

For the purpose to conclude and execute contracts/transactions with natural persons, Akola Group processes the following personal data: name, surname, residential address, email address, phone number, bank account details, contract details, etc.

Where a contract is concluded with a natural person, personal data are processed for the performance of a contract in accordance with Article 6(1)(b) GDPR. Personal data of representatives and contact persons of legal entities are processed on the basis of Akola Group's legitimate interest in concluding and performing contracts and maintaining business relationships pursuant to Article 6(1)(f) GDPR. Personal data related to contracts are retained for 10 years following the termination of the contract, unless a longer retention period is required by applicable law or the data must be retained for the establishment, exercise or defence of legal claims.

4.2. Newsletter and public announcement subscriptions

For the purpose of managing subscriptions to newsletters and public announcements, Akola Group processes the subscriber's e-mail address, subscription preferences (e.g. selected companies or types of notifications) and basic service usage information. Personal data are processed on the basis of your consent pursuant to Article 6(1)(a) GDPR and are retained for 3 years from the date consent was obtained or until consent is withdrawn, whichever occurs first. Akola Group uses Euroland IR services to administer subscriptions. Therefore, Euroland IR processes subscriber personal data on behalf of Akola Group.

4.3. When you visit social media site "Linkedin" account

Information communicated to us when visiting our social media sites (including notifications, use of "Like" and "Follow" buttons and other communication) will be controlled by us jointly with social media managers as joint controllers.

Currently, we have the following account: LinkedIn "Akola Group". If you have any questions about how your personal data are processed on that social media site, please read their privacy policy at <https://www.linkedin.com/legal/privacy-policy> and contact the service provider directly.

4.4. Management of securities accounts and payment of dividends

For the purpose of managing securities accounts and paying dividends, Akola Group processes the following personal data of shareholders: name, surname, personal identification number, number of shares held, information on when the person became a shareholder, information if a person is resident in the Republic of Lithuania. These personal data are processed on the basis of a legal obligation and is constantly updated when the list of shareholders changes.

4.5. Award of scholarships

For the purpose of awarding scholarships, Akola Group processes the following personal data of the scholarship recipient: name, surname, personal identification code, residential address, telephone number, bank account number. This personal data is processed on the basis to execute a contract and stored for 10 years after the expiry of the contract.

4.6. Verification of compliance with international sanctions and restrictive measures

The due diligence on business partners requires the completion of a business partner questionnaire and a business partner declaration. For this purpose, the Akola Group processes the following personal data: name, surname, position, signature of the person acting on behalf of the business partner, name, surname, date of birth, nationality, residential address, telephone number, e-mail address, board member: name, surname, nationality, date of birth, shareholder: name, surname, date of birth, size of shares, final beneficiary: name, surname, date of birth, nationality, percentage of ownership, and the personal data contained in the copies of the documents requested. In addition, information on the data subjects included in the checking shall be collected from publicly available sources of information, including but not limited to public registers, public media and other sources.

The above personal data are processed for the purpose of complying with sanctions and compliance obligations applicable to Akola Group pursuant to Article 6(1)(c) GDPR and, where a particular verification activity is not expressly required by law, on the basis of Akola Group's legitimate interest in knowing its business partners and managing compliance and reputational risks pursuant to Article 6(1)(f) GDPR. The data are retained for 5 years following completion of the verification process. Where necessary for compliance with legal obligations or for the establishment, exercise or defence of legal claims, the retention period may be extended accordingly.

4.7. Recruitment

For recruitment purposes, Akola Group receives candidates' personal data from recruitment agencies engaged by the Company. The personal data processed include name, surname, contact details, education, work experience and other information contained in the candidate's CV. Personal data are processed for the purpose of assessing a candidate's suitability for a specific position on the basis of Akola Group's legitimate interest in conducting recruitment processes pursuant to Article 6(1)(f) GDPR and, where processing is necessary to take steps at the request of the candidate prior to entering into an employment contract, pursuant to Article 6(1)(b) GDPR. Candidate personal data are retained during the recruitment process and for up to one month following its completion, after which CVs and related recruitment information received from recruitment agencies are deleted. Akola Group does not maintain a separate candidate or talent database.

4.8. Implementing statutory obligations relating to the organisation of activities

To ensure proper compliance with obligations applicable to Akola Group, the Company processes personal data of shareholders, members of management and supervisory bodies, ultimate beneficial owners and other relevant stakeholders, including their name, surname, personal identification

number, place of residence, date of election or appointment, identity document details or a copy of the identity document of the ultimate beneficial owner where required, information regarding the involvement of the ultimate beneficial owner and their close associates in political activities, as well as personal data contained in resolutions, minutes and powers of attorney of the General Meeting of Shareholders and management and supervisory bodies. Such data are processed for the purpose of complying with legal obligations applicable to Akola Group or, where the relevant processing is not expressly required by law, on the basis of Akola Group's legitimate interest in ensuring the proper organisation of its activities and the management of legal and compliance risks.

Personal data processed for this purpose shall be kept for the period prescribed by law.

4.9. Registration of management board, supervisory board and audit committee members and disclosure of regulated information

With respect to individuals elected or appointed to the management board, supervisory board or audit committee, Akola Group processes personal data necessary for corporate registration, financial reporting and regulated disclosure obligations. Depending on applicable requirements, personal data may include name, surname, personal identification number or date of birth, position held, term of office commencement and end dates, education, professional experience and number of Akola Group shares held. Where required by law, personal data relating to family members or closely associated persons may also be processed, including names, personal identification numbers or other identifying information.

For registration purposes, information required by the Register of Legal Entities managed by the State Enterprise Centre of Registers may be submitted, including name, surname and personal identification number. Residential address information may be linked by the Centre of Registers through its systems. For regulated disclosure purposes, the following information may be published through Nasdaq Vilnius and/or other regulated information dissemination systems used by the Company: name and surname, education, current positions, number of Akola Group shares held, commencement and expiry dates of the term of office. Personal data may also be provided to other competent authorities where required by law.

Such processing is primarily carried out for compliance with legal obligations applicable to the Company pursuant to Article 6(1)(c) GDPR. Personal data are retained for the periods prescribed by applicable laws and the Company's document retention requirements. Information lawfully disclosed through regulated information dissemination systems may remain publicly available in accordance with the publication and archiving rules of the relevant systems.

4.10. Publication of photographs of management board, supervisory board and audit committee members

For the purpose of informing shareholders and other stakeholders about the composition of the Company's management board, supervisory board or audit committee, presenting the persons appointed or elected to such bodies and ensuring transparent information regarding the Company's governance and supervisory structure, Akola Group processes the member's photograph (image).

Photographs may be published on the Company's website, Nasdaq Vilnius website and/or through regulated information dissemination systems used by the Company. Photographs are processed on the basis of the data subject's consent pursuant to Article 6(1)(a) GDPR. Consent is voluntary and may be withdrawn at any time without affecting the lawfulness of processing carried out before withdrawal.

Photographs are retained for 5 years following the end of the respective term of office unless consent is withdrawn earlier. Upon withdrawal of consent, the Company will cease further consent-based use of the photograph and remove it from channels under its control, unless another lawful basis for processing exists. Withdrawal of consent does not require the Company to retrieve or destroy printed publications lawfully distributed prior to withdrawal and cannot guarantee removal from third-party sources outside the Company's control.

4.11. Implementing statutory obligations to detect irregularities and ensure sustainability

In order to ensure adequate protection of whistleblowers, prevention of corruption, implementation of equal opportunities, protection of human rights and other sustainability factors, the Akola Group processes the following personal data of the persons concerned: name, surname, telephone number, e-mail address, content of the report or other informative text, evidence of the violation provided by you: video and/or audio recordings, photograph, screenshot, communication, etc. Personal data is processed in order to comply with a legal obligation or legitimate interest.

Personal data processed for this purpose shall be kept for the period prescribed by law.

4.12. Cookies

When you visit the Akola Group website, cookies and similar technologies may be used. They are used to ensure website functionality, remember your preferences, analyse website usage and, where you have provided consent, enable third-party content. Strictly necessary cookies are used without your consent where required for the operation of the website or provision of a service expressly requested by you. Functional, analytical and advertising cookies, as well as similar technologies, are used only with your consent. The current list of cookies used, their providers, purposes and retention periods is available in the Akola Group Cookie Policy.

Third-party content, such as YouTube videos, may be integrated into the website. Non-essential cookies and similar technologies associated with such content are activated only upon your consent. Information about such cookies, providers and applicable conditions is available in the Cookie Policy.

Investor-related sections of the website also use Euroland IR analytical and subscription tools. Cookies and similar technologies associated with these tools are described in the Cookie Policy, while subscriber data processing is described in Section 4.2 of this Privacy Policy.

The Cookie Policy is available at: <https://www.akolagroup.lt/en/cookies/>.

Akola Group does not control how third-party websites place cookies, even where users are redirected from our website. Therefore, where you access another website through a link on our website, you should review the cookie policies of those websites separately.

5. HOW IS YOUR PERSONAL DATA PROCESSED?

Your personal data will be processed in accordance with the General Data Protection Regulation (GDPR). We will manage your personal data responsibly and securely. When identifying the means of personal data processing and in the course of such processing, the Company undertakes to implement appropriate technical and organisational measures for protecting your personal data from accidental or unlawful destruction, damage, modification, loss, disclosure or any other kind of illegal handling and to adopt proper measures taking into account the risks around your personal data processing.

6. WHO CAN WE DISCLOSE YOUR PERSONAL DATA TO?

We may disclose information about you to our employees, intermediaries, service providers, such as debts administrators or debt recovery companies, archiving service providers, marketing services, IT service providers or subcontractors, if necessary for the purposes set forth in this Privacy Policy.

Personal data relating to members of the Company's management and supervisory bodies may also be disclosed, where applicable as independent recipients/controllers, to the State Enterprise Centre of Registers, AB Nasdaq Vilnius, regulated information dissemination systems used by the Company, and other competent public authorities to the extent necessary for registration, disclosure of regulated information, or the fulfilment of other purposes prescribed by law.

Your personal data may also be transferred to other companies within the Akola Group, where necessary for a specific purpose set out in this Privacy Policy, such as the performance of group-wide administrative, IT, accounting, legal, compliance or other centralized functions. The legal basis for such transfers is determined according to the specific purpose and may include the legitimate interest of Akola Group or the relevant group company in the efficient administration of the Group's operations, the performance of a contract, or compliance with a legal obligation. Information about companies belonging to the Group and the current Group structure is available at: <https://www.akolagroup.lt/grupes-struktura/>

We may disclose your personal data to data processors that provide services to us (or perform work on our behalf), such as IT service providers, auditors, lawyers, consultants, accounting service providers and other service providers that process personal data on behalf of Akola Group in its capacity as data controller.

Data processors will be allowed to process your personal data solely based on our instructions and only to the extent necessary. We will take all necessary steps to ensure that our data processors implement the appropriate organizational and technical measures to ensure safety and confidentiality of your personal data.

Your data may also be transferred to public bodies or institutions or other persons who are statutorily entrusted with certain functions. In addition, we may disclose your information in the following cases:

- If required to do so by law;
- In order to protect our rights or interests (including the case when your personal data is disclosed to others for debt recovery purposes);
- When intending to sell any of the Company's business or assets, we are asked to disclose your personal data to potential buyers of such business or assets;

Your personal data may be transferred outside the European Economic Area only in compliance with the requirements set out in Chapter V of the GDPR. Depending on the destination country and the circumstances of the transfer, the Company may rely on an adequacy decision adopted by the European Commission pursuant to Article 45 of the GDPR, appropriate safeguards under Article 46 of the GDPR (including the European Commission's Standard Contractual Clauses), or, only in exceptional cases, a derogation applicable under Article 49 of the GDPR. Where required, the Company also assesses whether supplementary measures are necessary to ensure a level of personal data protection that is essentially equivalent to that guaranteed within the European Economic Area.

7. WHAT ARE YOUR RIGHTS?

This section gives information about your rights associated with the processing of your personal data by the Akola Group and about how such rights may be exercised. If you want more information about your rights or want to exercise them, please contact us at the e-mail address given in this Privacy Policy.

7.1. Right of access to your personal data

You have the right to obtain confirmation as to whether or not Akola Group processes your personal data and, where that is the case, to access the personal data being processed and receive the information referred to in Article 15 of the GDPR, as well as a copy of such data. You may submit your request using the contact details provided in this Privacy Policy. Where there are reasonable doubts concerning the identity of the person submitting the request, we may request additional information necessary to verify that person's identity.

7.2. Right to withdraw consent

If the processing of your personal data is based on your consent, you have the right to withdraw that consent at any time by contacting us using the contact details provided in this Privacy Policy. The withdrawal of consent shall not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.

7.3. Right to request more information

If you have any questions regarding the information provided in this Privacy Policy or would like to receive further information about the processing of your personal data carried out by Akola Group, please contact us using the contact details provided in this Privacy Policy.

7.4. Additional rights

Below, please find information about your additional rights that may be exercised by you as follows:

- You have the right to request us to correct any inaccuracy of your personal data. In that case, we may ask you to confirm the corrected information.
- You have the right to request us to erase your personal data. This right may be implemented in the cases described in Article 17 of the GDPR.
- You have the right to request the restriction of the processing of your personal data in the cases set out in Article 18 of the GDPR.
- You have the right to data portability if processing of such data is carried out by automated means and we have obtained such data from you based on your consent or for the purpose of concluding the agreement. If you opt to exercise this right, we will transmit at your request a copy of the data submitted by you.
- You have the right to object to processing of your personal data pursuant to Article 21 of the GDPR.

8. HOW CAN YOU EXERCISE YOUR RIGHTS?

To enforce your rights, you may submit requests, complaints or claims to us in writing in any of the following ways:

- By sending an e-mail to dap@akolagroup.lt;
- By sending a letter to Subačiaus g. 5, LT-01302 Vilnius, Lithuania;
- By arriving at Subačiaus g. 5, 01302 Vilnius, Lithuania;

We will respond to requests, complaints or claims received from you in writing in accordance with applicable legal requirements and, in any event, no later than one month from the date of receipt of the request. Where necessary, taking into account the complexity and number of requests, this period may be extended by a further two months. In such cases, we will inform you of the extension and the reasons for it within one month of receiving the request.

If you contact us, we may process the data you provide to us, i.e. name, surname, email address, telephone number, date and text of the correspondence in accordance with the procedures set out in this Privacy Policy. Please note that we may need to contact you by post, email or telephone. Please notify us of any changes to your personal data.

If, upon receiving a request, we have reasonable doubts concerning the identity of the person submitting the request, we may request additional information necessary to verify that person's identity. The means used to verify identity will be selected taking into account the nature of the request, the sensitivity of the personal data concerned, and the principle of proportionality.

If we fail to provide you with the necessary information and/or should you have complaints about how your personal data are processed, you may approach your national Data Protection Authority or Lithuanian State Data Protection Inspectorate (www.vdai.lt) by filing a complaint.

9. RESPONSIBILITY

We kindly ask that any personal data provided to Akola Group be accurate and that you inform us of any changes to material information. This provision does not limit the obligations and responsibilities of Akola Group as established under the GDPR and other applicable laws.

10. HOW WILL WE INFORM ABOUT CHANGES IN OUR PRIVACY POLICY?

Akola Group may periodically update or amend this Privacy Policy. Any updated or amended version of the Privacy Policy shall become effective upon its publication, including where changes are made due to modifications in personal data processing activities, applicable legal requirements, or the practices of supervisory authorities. The current version of the Privacy Policy is available on the Akola Group website at <https://www.akolagroup.lt/>.

Where material changes are made to this Privacy Policy, we will inform you in an appropriate manner, taking into account the nature of the changes. The "Date of Update" indicated below shows when this Privacy Policy was last updated.

Date of Update: 29 September 2026