

INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR SHAREHOLDERS

Version dated 01.11.2024.



1. General information

Joint Stock Company "VALMIERAS PIENS" (hereinafter referred to as "the Company") informs its shareholders and their representatives about the processing of their personal data which is made by the Company.

The categories of data subjects to whom this notice applies are as follows:

- shareholders as natural persons;
 - representatives of shareholders (legal entities);
- hereinafter collectively referred to as "you".

The Company will process applicants' personal data in accordance with the requirements of *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC* (hereinafter referred to as "General Data Protection Regulation")¹ and hereby provides information about the processing of your personal data in accordance with Article 13 of the General Data Protection Regulation (information to be provided where personal data are collected from the data subject).

For the purposes of the General Data Protection Regulation, the Company acts as the data controller, being responsible for the processing of personal data processed by it. You are a data subject within the meaning of the General Data Protection Regulation. The contact details of the data controller can be found at the end of this notice.

The Company is not responsible for the processing of your personal data by other authorities or other data controllers, such as the Register of Enterprises, a financial institution (bank), the Central Securities Depository (Nasdaq CSD) where your shares are registered, and others. If you have any questions about the processing of your personal data by these authorities, you should contact them directly.

The terms "controller", "processing", "personal data", "data subject" have the meanings set out in the General Data Protection Regulation.

2. Personal data, collection and processing

Your personal data is obtained directly from you or from a Central Securities Depository. We obtain your personal data through the ESIS system maintained by the Nasdaq CSD, which collects data on the Company's shareholders and provides it to the Company as reasonably necessary.

The types of personal data collected and processed by the Company according to this Notice, along with the purposes of processing and the corresponding legal (lawful) basis, are mentioned in the table below:

Types of personal data	Purposes of processing	Legal basis for processing
Full name, personal identity number (if the person does not have a personal identification number, date of birth, number and date of issue of the identity document, country and institution that issued the document), address of place of residence, category, number and nominal	Shareholder records and identification Organisation of the shareholders' meeting, preparation of the shareholders' list*, ensuring that shareholders' legitimate interests are pursued, adoption of resolutions at the shareholders'	Article 6(1)(c) of the General Data Protection Regulation - compliance with a legal obligation

¹ <https://eur-lex.europa.eu/legal-content/LV/TXT/PDF/?uri=CELEX:32016R0679>

<p>value of shares held, number of votes, represented share capital.</p> <p>For representatives of a legal entity - name and registration number of the legal entity, and details of the right of representation</p> <p>Your attendance at shareholders' meetings, opinions expressed, requests made, votes cast and other actions you take as a shareholder.</p>	<p>meeting</p> <p><i>(*in accordance with the Commercial Law, information on shareholders holding dematerialised shares shall be indicated in the list of shareholders in accordance with the information on the company's shareholders provided by the central securities depository where the shares are registered).</i></p>	
<p>Full name, personal identity number (if there is no personal identity number, date of birth, number and date of issue of the identity document, issuing country and authority), address of residence/registered address, e-mail address, telephone number</p>	<p>For the purpose of contacting the shareholder, providing information, responding to a request and identifying the shareholder</p> <p>For registration and processing of the ballot paper for voting before the shareholders' meeting (if the Company provides for submission of the vote before the shareholders' meeting in accordance with the provisions of the Commercial Law and the shareholder submits his/her vote by electronic means)</p>	<p>Article 6(1)(c) of the General Data Protection Regulation - compliance with a legal obligation</p> <p>Article 6(1)(a) of the General Data Protection Regulation - Your consent</p>
<p>Information on the authorization or representation of the shareholder - legal entity or organisation</p> <p>Personal data contained in the power of attorney*</p>	<p>For verifying the right of representation and identifying the representative</p> <p><i>(*in accordance with the Commercial Law, a power of attorney executed in writing by the shareholder's representative shall be submitted to the company and attached to the minutes of the shareholders' meeting)</i></p>	<p>Article 6(1)(c) of the General Data Protection Regulation - compliance with a legal obligation</p>
<p>All of the above personal data, as well as information about the subject matter of the dispute or claim and/or information obtained in the course of legal proceedings</p>	<p>For the performance of procedural acts in the context of litigation, as well as for the general protection of the Company's legal interests in the event of disputes (including litigation)</p>	<p>Article 6(1)(f) of the General Data Protection Regulation - legitimate interests of the company*.</p> <p><i>(*the legitimate interests of the Company are the protection of the Company's legal interests in disputes: gathering, presenting and using evidence before a public authority or a court).</i></p>

The processing of your personal data is necessary for the Company to comply with the requirements of the regulatory enactments (mainly the Commercial Law) and to ensure compliance with your rights as a shareholder; therefore, the disclosure and processing of your personal data by the Company is mandatory in cases where you wish to exercise your rights as a shareholder or where the Company needs to exercise its legal obligations.

For processing of personal data that is not necessary for the purposes set out above or based on the legal grounds set out above but is carried out on the basis of your consent, you have the right to withdraw your consent to the processing of that personal data (except where the processing is necessary for the protection of the legitimate interests of the Company or representation in an extrajudicial or judicial dispute resolution).

Your decision to disclose additional personal data (e.g. telephone number, contact address) to us is voluntary. However, if you do not provide the information necessary to comply with the request when you make the request, we may not be able to fulfil some of the purposes set out in this notice (such as contacting you to respond to the request).

3. Recipients of personal data

Your personal data may be available to service providers who provide to the Company services such as information technology (email delivery, etc.), postal and/or courier, legal representation, share register maintenance and other services. Personal data will only be transferred or made available to these third parties for the purpose of providing the relevant services or if required to do so by regulatory enactments.

In certain cases, your personal data may be accessible to public authorities, courts or other bodies where the Company needs to defend and/or represent its legitimate interests.

The Company does not transfer your personal data outside the European Union and the European Economic Area.

4. Duration of processing of personal data

Your personal data is used and stored in accordance with the requirements of the regulatory enactments on the storage of shareholders' meetings and other documents related to shareholders.

If your personal data is included in a document, it will be retained for as long as the document is stored. The storage of documents shall be based on the requirements of laws and regulations and in accordance with the Company's internal regulatory enactments (including the file nomenclature).

Correspondence with you may be stored for evidentiary purposes where it is necessary for the protection of the Company's legitimate interests and/or representation before the courts and/or public authorities.

If your personal data is stored for evidentiary purposes in the event of claims or legal proceedings, the Company shall ensure compliance with the principles of data minimisation and purpose limitation in accordance with Article 5 of the General Data Protection Regulation.

5. Additional information

If you are on the Company's territory or premises, such as during a shareholders' meeting, please be aware that you may be subject to video surveillance. Information on video surveillance can be found on the website provided below, as well as on www.foodunion.com in the "Privacy Policy" section (under the "Video Surveillance" subsection).

6. Your rights

The General Data Protection Regulation gives data subjects the right to influence the processing of their personal data.

The applicant has the right to access his/her personal data and to obtain information about data processing; to request the rectification of wrong, inaccurate or incomplete personal data, to restrict data processing; to request data erasure; to exercise the right to data portability; to lodge a complaint with the data protection authority; to withdraw consent (if the processing of personal data is based on consent).

In order to exercise rights as a data subject, to withdraw the consent or ask any questions related to the processing of personal data, the applicants may send their request by e-mail or by post to the Company's

registered office. In case of unjustified or unlawful processing of personal data the applicant has the right to lodge a complaint with the State Data Inspectorate (in Latvia).

7. Information about the data controller

Name: "Valmieras piens", joint stock company

Registration number 40003020475

Address: 93 Rigas Street, Valmiera, Valmiera District, LV-4201

Phone +371 67066887

E-mail: valmieras.piens@vpiens.lv

Contact details of the data protection officer: dati@foodunion.com