



# Transilvania Investments

## INFORMATION FOR TRANSILVANIA INVESTMENTS ALLIANCE SHAREHOLDERS REGARDING THE PERSONAL DATA PROCESSING

In compliance with the legal provisions, Transilvania Investments Alliance has the obligation to administer safely and only for specified purposes the personal data listed in the shareholders' register of the company provided by Depozitarul Central S.A., the personal data provided by the shareholders and other personal data.

Transilvania Investments Alliance processes the personal data of its shareholders in order to fulfil the legal obligations provided by the Companies Law no. 31/1990, as subsequently amended and supplemented, the capital market legislation and the other legal provisions applicable to its field of activity.

The categories of personal data of the shareholders processed by the company are:

- Identification data (name, surname, Personal Identification Number, Serial / Number of the identity document or passport, photo, address, country of residence);
- Number of shares held;
- Value of dividends receivable and related taxes.

Transilvania Investments Alliance uses the personal data of its shareholders for the following purposes:

(i) Calculation, registration and payment of dividends due to its shareholders, with the appropriate application of the tax rates in force as at the payment date;

(ii) Ensuring the exercise by shareholders of their voting and/or representation rights in general meetings of shareholders;

(iii) Sending written answers to the shareholders or authorized institutions' questions addressed to the company;

(iv) Providing information on phone. The identification in the database of the shareholders who call the dedicated telephone line, and who wish to contact an operator in order to be provided with personalized information, will be made on the basis of the last 7 digits of the Personal Identification Number and the name, and if these data are not sufficient for the exact identification of the shareholder, the address and date of birth are requested, as appropriate.

The shareholders' personal data are intended for use by Transilvania Investments Alliance for the aforementioned purposes and can only be communicated to the following recipients: the shareholders and their legal representatives, the conventional representatives of the data subjects, the central/local public authorities, the Financial Supervisory Authority (F.S.A.), Depozitarul Central S.A., the payment

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Alliance S.A.

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www.transilvaniainvestments.ro

CUJ/CIF: RO 3047687  
R.C. J08/3306/1992

Autorizatã A.F.I.A.:  
Autorizaþie ASF nr. 40/15.02.2018

Autorizatã F.I.A.I.R.:  
Autorizaþie ASF nr. 150/09.07.2021

Cod LEI (Legal Entity Identifier):  
254900E2IL36VM93H128

Capital social:  
216 244 379,70 lei

Nr. Registru ASF:  
PJR071AFIAA/080005

Nr. Registru ASF:  
PJR09FAIR/080006

IBAN B.C.R. Braşov:  
RO08 RNCB 0053 0085 8144 0001

agents (banks) with whom the company concluded contracts for the payment of dividends. Transilvania Investments Alliance is also obliged to communicate personal data requested by the courts or criminal investigation bodies, only if they are necessary for the conduct of trials or investigations.

Please note that any data changes in the shareholders 'register (changes of name, addresses, share transfers, etc.) are only carried out by Depozitarul Central S.A. Bucharest, at the request of the entitled shareholder/person.

The periods of time the personal data processed by Transilvania Investments Alliance are stored comply with the provisions of the Accounting Law no. 82/1991, as subsequently amended and supplemented, the National Archives Law no. 16/1996 as subsequently amended and supplemented and the other applicable legal provisions.

In accordance with GDPR (General Data Protection Regulation no. 679/2016), as a data subject, you have the following rights pertaining to your personal data processed by our company:

**Right of access to personal data** –the right to obtain from the Company confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, you have the right to be granted access to these data. To this respect, the Company will provide a copy of the personal data undergoing processing. The first information will be provided without any charge. For any other requested copies, the company may charge a reasonable fee based on administrative costs.

**Right to rectification of personal data** – you have the right to obtain from the Company the rectification of the inaccurate personal data concerning you, including the completion of such data.

Please note that, according to the legal provisions, the rectification of the personal data of the company's shareholders may only be carried out by Depozitarul Central S.A., with headquarters in Bucharest, Carol I Boulevard no. 34-36, floors 3, 8 and 9, sector 2, postal code 020922.

**Right to erasure of personal data ('right to be forgotten')** – the data subjects have the right to obtain from the Company the erasure of personal data concerning them, without undue delay, and the Company has the obligation to erase the personal data without undue delay, in the specific cases set forth by the GDPR.

Please note that in certain circumstances the Company may be required to keep the personal data of certain categories of data subjects, in compliance with the legal provisions.

#### **Right to restriction of personal data processing**

You have the right to obtain from the Company restriction of personal data processing, in the following specific circumstances set forth by the GDPR:

- The data subject disputes the accuracy of the data, in which case the processing is restricted for a period which allows the Company to verify the accuracy of the data;
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- The Company no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;
- The data subject has objected to processing, in which case the processing is restricted for the period necessary to verify whether the legitimate grounds of the Company override those of the data subject.

### Right to personal data portability

The data subjects have the right to receive the personal data concerning them, which they have provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller. This right shall only apply if the processing is based on consent or on a contract and is carried out by automated means.

### Right to object and automated individual decision-making process

- The data subjects have the right to object, on grounds relating to their particular situation, at any time to the processing of personal data concerning them, unless the Company demonstrates that it has legitimate and compelling grounds for processing, which override the interests, rights and freedoms of data subjects or for the establishment, exercise or defense of legal claims.
- Where personal data are processed for direct marketing purposes, the data subjects have the right to object at any time to processing of personal data concerning them for such marketing, which includes profiling to the extent that it is related to such direct marketing.
- The data subjects have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

### Right to file a notification with the national supervisory authority

Without prejudice to any other administrative or judicial remedy, the data subjects have the right to file a notification with the National Supervisory Authority for Personal Data Processing, if the data subjects consider that the processing of their personal data violates their rights set forth by the GDPR:

Romanian National Supervisory Authority for Personal Data Processing	B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, Postal Code 010336 Bucharest, Romania anspdcpc@dataprotection.ro
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For exercising the above-mentioned rights, as well as for any further questions regarding this notification or in connection with the processing of personal data by Transilvania Investments Alliance, please contact us by any of the communication means described below, specifying your name, telephone number, postal address or email address (depending on the communication mean you choose), as well as the purpose of your inquiry:

- by mail, at the address str. Nicolae Iorga nr. 2, Braşov, 500057;
- by fax, at 0268473215, 0268/473216;
- by email, at the address [dpo@transilvaniainvestments.ro](mailto:dpo@transilvaniainvestments.ro).

Should you be not satisfied with the answers received within the legal deadline, you can contact the National Authority for the Supervision of Personal Data Processing ([www.dataprotection.ro](http://www.dataprotection.ro)) and/or the courts.

Additional information is available on our Company's website [www.transilvaniainvestments.ro](http://www.transilvaniainvestments.ro), under section *Personal Data Protection*. Any amendments and supplementations of Transilvania Investments Alliance's policy regarding the personal data processing that significantly impact the shareholders will be published on the Company's website.