

Nr. 2/28.05.2021

INFORMATION NOTE

on processing the personal data of individuals shareholders and of its proxy for the purpose of paying dividends

Compa S.A., headquartered in Sibiu, No.8, Henri Coandă Street, registered at the Trade Register Office under no. J32/129/1990, sole registration code 788767, represented by Mr. Ioan Deac - CEO and Mr. Ioan Miclea – CFO, as a controller (*Controller or Compa*)

informs you that your personal data are being processed for the purpose of paying dividends, in compliance with the provisions 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 (*General Data Protection Regulation*) and in compliance with the national legislation in force.

I. The categories of data subjects

The Controller processes personal data of shareholders, natural persons and, as the case may be, of natural persons acting as representatives of shareholders.

As the case may be, *the Controller* will also process data on the persons empowered to act on behalf of the legal person.

II. The categories of personal data concerned

- **personal data from Compa Shareholders Registry** (Shareholders Registry), kept by Depozitarul Central S.A., namely: first and last name; personal identification number (Romanian citizens) or an equivalent unique identification number (for foreign citizens); series and number of the identification document (ID/passport/equivalent document); fiscal identification number¹, address (town, county/administrative territorial division, country); number of shares and as the case may be, information regarding bank account, garnishment.

- **value of the dividend** due to each shareholder (gross/net) and the **value of the dividend tax**, due by each shareholder;
- **personal data from the fiscal residence certificates;**
- **personal data of natural persons acting as representatives of shareholders:** first and last name; personal identification number (Romanian citizens) or an equivalent unique identification number (for foreign citizens); address (town, county/administrative territorial division, country).
- **personal data of persons empowered to act on behalf of the legal person:** first and last name; personal identification number (Romanian citizens) or an equivalent unique identification number (for foreign citizens); address (town, county/administrative territorial division, country).

III. The purposes of the processing and the legal basis for the processing

The Controller processes personal data for performing the payment of dividends and of the dividend tax, as well as for releasing payment proof/certificates.

The Controller processes personal data pursuant to art. 6 para. (1) lit. c) of the *RGPD*, respectively for compliance with a legal obligation to which the controller is subject, according to the legal framework, respectively according to the Companies Law no. 31/1990, of Law no. 24/2017 on issuers of financial instruments and market operations and of the FSA Regulation no. 5/2018 on issuers of financial instruments and market operations.

IV. The source the personal data originate

Compa receives personal data of shareholders, natural persons and as the case may be, of natural persons as representatives of shareholders, from the Shareholder's Registry provided by Depozitarul Central S.A., as an excerpt from the Shareholder's Registry (Registry Excerpt) and the personal data of shareholders, natural persons, listed in the fiscal residence certificates, from Participants to Depozitarul Central S.A. system, subject to the contracts concluded with shareholders for the personal data included in the documents sent for the avoidance of double taxation.

The Controller may also obtain personal data directly from shareholders.

The refusal to provide data may determine the impossibility of identifying the shareholder in the Register of Shareholders, as well as the impossibility of contacting him by Compa when necessary.

V. The recipients or categories of recipients of the personal data, for the payment of dividends and of the dividend tax are:

- (a) Compa employees that are responsible for dividend payments
- (b) service providers (including consultants, lawyers, IT platform / software administrators used to keep track of shareholders or to exercise certain rights or obligations of the Company, related to shareholders, archiving companies)
- (c) Depozitarul Central S.A.
- (d) BRD - Payment agent
- (e) ANAF.

VI. The period for which the personal data will be stored

Personal data processed for payment of dividends and for the dividend tax, conveyed in financial-accounting documents will follow the regime, including the preservation period provided in the effective legislation for this category of documents.

VII. Rights of the data subject

Each shareholder, natural person or as the case may be, a natural person as representative of a shareholder has the following rights regarding the personal data processing by Compa:

- the right to request access to personal data, to modify and delete personal data;
- the right to request and obtain the restriction to process and the right to deny the personal data processing;
- the right to obtain personal data portability;
- the right to press charges at the National Supervisory Authority for Personal Data Processing

These rights may be exercised by sending a written request to the Company, either in physical form, at the address in Sibiu, Str. Henri Coandă no. 8, Sibiu County, with the mention Data Protection, or in electronic form, to the email address dataprotection@compa.ro. To the extent that they do not contravene the law, so the Company is not required to comply with that request, your request will be answered as soon as possible and within 1 (one) month of receipt of the request.

Please access the website www.brd.ro and get acquainted with the content of the following documents:

- *“Information on the Processing of Personal Data Individuals and Authorized Individuals”*
- *“Information Regarding the Processing of Personal Data of Legal Entities”.*

Following the analysis of net dividends payment requests submitted to its banking agencies, BRD reserves the right to request additional documents.

For any supplementary information regarding the personal data processing activity, please contact us to the email address: dataprotection@compa.ro. As well, we inform you about the Data Protection Officer: Sabina Pîrvu - tel: 0269 23787, fax: 0269 237770, email: dataprotection@compa.ro.

COMPA S.A.

Ioan DEAC - Chief Executive Officer

Drafted: Data protection officer