FOR SHAREHOLDERS AND INSIDERS (INCLUDING RELATED PERSONS)

4.4.**1. Types of Personal Data collected**

- Contact information: Full name; date of birth; nationality; ID document number (Citizen Identification Card/ID Card/Passport) or personal identification number; email address; contact address; contact phone number.
- Information on shares/shareholding: Number of shares; ownership ratio; the time of becoming/ceasing to be a shareholder; history of ownership changes.
- Information on share transactions: Time of transaction registration; transaction history; transaction value; transaction-reporting information of Insiders and Related Persons.
- Information on the Shareholder's related rights and obligations: Voting rights; voting information; pre-emptive and issuance rights; rights to receive dividends and profits.
- Information on positions within the Company: Title; management role; scope of authority and responsibility; date of appointment and removal.
- Legal relationships: “related person” relationships as prescribed by law; information on Insiders/Related Persons (including history).
- Tax information: Tax obligations arising from dividends and the transfer of shares.
- Ownership-verification information: Legal documents and documents evidencing ownership of capital/shares.
- Information on attendance at general shareholders' meetings and authorization: List of individuals attending the meeting; personal information of persons authorized to attend the meeting and vote.
- Data used for governance and control purposes, including data for detecting conflicts of interest and information relating to indications of violations of disclosure or governance obligations.
- Data used for dispute resolution and protection of rights: Legal records; evidentiary documents; correspondence relating to complaints, disputes, or litigation; data used to reconcile obligations and protect rights following a transaction.
- Sensitive Personal Data (if any): Bank account information for receiving dividend/profit payments or for carrying out transactions relating to capital contributions/shares; images of ID cards, Citizen Identification Cards, or ID Cards.
- Other necessary personal information required by law from time to time (if any) to support Company governance in accordance with the law on enterprises and securities.

4.4.2.. Legal basis for processing Personal Data and purposes of processing Personal Data

To carry out purposes for which the law permits the processing of Personal Data without the consent of the Data Subject, including:

4.4.2.1 To fulfill mandatory legal obligations relating to corporate governance, securities (if applicable), and related regulations

- Preparing and maintaining the shareholder/member register and managing the history of ownership of shares/capital contributions.

- Disclosing information and preparing periodic/ad-hoc reports as required by law (on enterprises, securities, and specialized regulations, if any).
- Managing transactions, changes in ownership and capital contributions, and transactions of Insiders and Related Persons.
- Fulfilling tax and financial obligations relating to capital owners.
- Supporting inspections, examinations, audits, and requests of competent state authorities.
- Retaining records as required by law.

4.4.2.2. To perform agreements and the rights and obligations of the Data Subject under the law

- Exercising rights and obligations established under the Company's Charter, resolutions/decisions of the General Meeting of Shareholders and the Board of Directors, authorization agreements, and other lawful legal relationships.
- Managing the list of meeting attendees and authorized persons, voting information, and decision-making procedures at meetings.
- Recording and exercising shareholder rights such as receiving dividends/profits, transferring shares, pre-emptive rights, issuance rights, and other arising rights and benefits.
- Exchanging and communicating with shareholders and Insiders (including Related Persons) to ensure the rights of shareholders and Insiders and to support corporate governance.

4.4.2.3. To protect the legitimate and lawful rights and interests of the Data Subject and/or the Company

- Preventing, detecting, and managing conflicts of interest in the Company's governance and management.
- Preventing insider trading, misuse of insider information, and other related legal violations.
- Monitoring and mitigating the risk of violations of governance obligations, disclosure obligations (if applicable), and other legal obligations.
- Responding to requests, recommendations, and complaints, and resolving disputes and related entitlements, even after the cessation of shareholder, Insider, or Related Person status.
- Protecting the Company's reputation, transparency, and compliance in its operations.

4.4.2.4.Performing the Company's other responsibilities (if any) as prescribed by law from time to time.

The processing of Personal Data under this section includes the transfer of Personal Data to a Personal Data Processor or to third parties (e.g., subcontractors) in order to carry out the purposes stated above.

In the course of its business operations, the Company may undertake forms of corporate reorganization, including but not limited to restructuring, division, separation, merger, or consolidation. In such cases, Personal Data and the rights to use related information may be transferred and/or continue to be processed to support the activities mentioned above, provided that no new data-processing purpose arises beyond those set out in Section 4.4.2 of this Policy.