

PRIVACY POLICY

Version dated 1 October 2026

I. SCOPE, CONTROLLERS AND LEGAL FRAMEWORK

1.1. Scope and controllers

This privacy policy (the “Policy”) explains how SANEX S.A. and LASSELSBERGER S.A. (the “Controllers”) process the personal data of persons who interact with them, including through the website www.cesarom.ro (the “Platform”), in connection with commercial relationships, requests submitted through contact channels, the investor section, promotions or competitions, and marketing communications.

To the extent that SANEX S.A. and LASSELSBERGER S.A. jointly determine the purposes and means of processing, they act as joint controllers within the meaning of Article 26 of Regulation (EU) 2016/679 (“GDPR”). The Controllers have established, by means of an agreement, their respective responsibilities for compliance with the GDPR. The essence of this agreement may be made available to data subjects upon request. Data subjects may exercise their rights against each of the joint Controllers.

For information and to exercise your rights, you may contact us at office@ro.lasselsberger.com or by using the contact details displayed on the Platform. If a data protection officer has been appointed for the relevant processing, the request will be forwarded to that officer.

1.2. Legal framework

Data processing is carried out in accordance with the GDPR, Law No. 190/2018 on measures implementing the GDPR and, regarding commercial communications by electronic means and matters specific to electronic communications, Law No. 506/2004. Any other legislation applicable to the specific processing operation is also taken into account.

1.3. Relevant definitions under the applicable personal data processing legislation:

- (1) “personal data” means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to that person’s physical, physiological, genetic, mental, economic, cultural or social identity;
- (2) “processing” means any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- (3) “restriction of processing” means marking stored personal data with the aim of limiting its processing in the future;
- (4) “pseudonymisation” means processing personal data in such a manner that the data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures ensuring that the personal data are not attributed to an identified or identifiable natural person;
- (5) “profiling” means any form of automated processing of personal data consisting of their use to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

- (6) “controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of processing personal data;
- (7) “processor” means a legal person that processes personal data on behalf of the controller;
- (8) “recipient” means a natural or legal person, public authority, agency or other body to which personal data are disclosed, whether or not a third party. However, public authorities that may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of such data by those public authorities shall comply with the applicable data protection rules according to the purposes of the processing;
- (9) “third party” means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- (10) “representative” means a natural or legal person established in the Union, designated in writing by the controller or processor pursuant to Article 27, who represents the controller or processor with regard to their respective obligations under this Regulation;
- (11) “filing system” means any structured set of personal data accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;
- (12) “data protection officer” means a natural/legal person designated by the controller on the basis of professional qualities and expert knowledge to perform the tasks provided for in Article 39 GDPR.
- (13) “supervisory authority” means an independent public authority established by a Member State pursuant to Article 51;
- (14) “supervisory authority concerned” means a supervisory authority concerned by the processing of personal data because:
- the controller or processor is established in the territory of the Member State of that supervisory authority;
 - data subjects residing in the Member State where that supervisory authority is located are substantially affected or are likely to be substantially affected by the processing; or
 - a complaint has been lodged with that supervisory authority.

II. CATEGORIES OF DATA, PURPOSES AND LEGAL BASES FOR PROCESSING

We process only data that are adequate, relevant and limited to what is necessary for the purposes described below, in compliance with the data minimisation principle laid down in Article 5(1)(c) GDPR.

2.1. Commercial relationships, contracts, deliveries and complaints

We may process identification and contact data, the position held and organisation represented, signatures, information concerning orders, deliveries, payments, complaints and correspondence, as well as other data necessary for the commercial relationship.

The purposes are to initiate, negotiate, conclude and perform contracts, manage orders, deliver products, prepare transport documents, manage payments and resolve complaints. The legal basis is Article 6(1)(b) GDPR where the data subject is a party to the contract or requests steps prior to entering into it. For data relating to representatives, employees or contact persons of contractual partners, the legal basis is the legitimate interest under Article 6(1)(f) GDPR, consisting in conducting and administering the commercial relationship and ensuring communication with the contractual partner.

2.2. Accounting, tax and other legal obligations

We process the data necessary to issue and record invoices, payment documents and supporting documents, fulfil tax and accounting obligations, and provide information lawfully requested by competent authorities. The legal basis is Article 6(1)(c) GDPR, read, as applicable, together with Accounting Law No. 82/1991, Law No. 227/2015 on the Tax Code and the legislation issued for their implementation.

2.3. Promotions and competitions

In connection with promotions and competitions, we may process identification and contact data, participation information, bank details required for payment of prizes, and data required by tax legislation. For administering participation and awarding the prize, the legal basis is Article 6(1)(b) GDPR; for tax and accounting obligations, Article 6(1)(c) GDPR. If a separate activity is optional and not necessary for implementing the promotion rules, it will be based on consent under Article 6(1)(a) GDPR, requested separately.

2.4. Requests, correspondence and access to the investor section

We process data provided by telephone, email, forms or other contact channels in order to record, analyse and address requests and, where applicable, ensure authorised access to the investor section. The legal basis is Article 6(1)(b) GDPR where the request concerns a contract or pre-contractual steps, and Article 6(1)(f) GDPR in other cases, the legitimate interest being the management of communications, ensuring the operation of services and protecting access to information.

2.5. Direct marketing and newsletter

If you subscribe to the newsletter, we process your email address and subscription preference data in order to send commercial communications. The legal basis is consent under Articles 6(1)(a) and 7 GDPR, read together with Article 12(1) of Law No. 506/2004. We may use a double opt-in procedure and retain evidence of consent in accordance with Article 7(1) GDPR.

You may withdraw your consent at any time, free of charge, by using the unsubscribe link included in the communication or by sending a request to our contact address. Withdrawal does not affect the lawfulness of processing carried out before withdrawal, in accordance with Article 7(3) GDPR.

2.6. Fraud prevention, security and defence of rights

We may process data strictly necessary for the security of systems and the Platform, preventing and investigating misuse, preserving evidence, and establishing, exercising or defending legal claims. The legal basis is the legitimate interest under Article 6(1)(f) GDPR. Where processing is required by a legal obligation, the legal basis is Article 6(1)(c) GDPR.

2.7. Cookies

The Platform may use cookies and similar technologies. Cookies strictly necessary for the operation of the Platform and the provision of requested services may be used without consent to the extent permitted by Article 4(5) of Law No. 506/2004. Cookies and similar technologies that are not strictly necessary, including those used for analytics, personalisation or marketing, are activated only after prior, freely given, specific, informed and unambiguous consent has been obtained in accordance with the GDPR and Law No. 506/2004. Users may accept or reject these categories and may modify or withdraw their choices at any time, as easily as they expressed them, without withdrawal affecting the lawfulness of prior processing. Detailed information on cookie categories, providers, purposes, storage periods and how preferences are managed is available in the separate Cookie Policy published on the Platform. The cookie list and consent mechanism configuration are updated according to the technologies actually used on the Platform.

2.8. Provision of data

Providing data may be a contractual or legal requirement. If the necessary data are not provided, we may be unable to conclude or perform the contract, process an order, award a prize, respond to a request or fulfil the relevant legal obligation. Where processing is based on consent, providing the data is optional.

III. DATA SOURCES AND RECIPIENTS

We collect data directly from the data subject or, as applicable, from the organisation represented by that person, contractual partners, distributors, service providers or public sources, to the extent permitted by law.

Data may be disclosed, strictly to the extent necessary, to the other Controller, affiliated companies involved in providing products or services, providers of IT, hosting, communications, archiving, courier, transport, payment, accounting, audit and consultancy services, partners involved in promotions, as well as public authorities, courts or other recipients provided for by law. Processors process data under agreements compliant with Article 28 GDPR.

IV. RETENTION PERIOD

We retain data only for as long as necessary for the purpose for which they were collected, in compliance with Article 5(1)(e) GDPR. When determining the period, we take into account the nature of the relationship, statutory retention periods, limitation periods and the need to establish, exercise or defend legal claims.

Financial and accounting documents and the data contained therein are retained pursuant to Article 25 of Accounting Law No. 82/1991, as a rule for five years calculated from 1 July of the year following the end of the financial year in which they were drawn up, unless a special provision requires a different period.

Data relating to contractual relationships and correspondence may be retained for the duration of the relationship and thereafter for the applicable statutory periods, including the general three-year limitation period provided for by Article 2517 of the Civil Code, unless a special period applies or retention is necessary in ongoing proceedings. Data used for the newsletter are retained until consent is withdrawn, without affecting the limited retention of evidence of consent and of an objection/unsubscription for the purpose of demonstrating compliance and preventing messages from being resent.

Upon expiry of the applicable periods, the data are erased, anonymised or archived with restricted access, as appropriate.

V. SECURITY AND INTERNATIONAL TRANSFERS

We implement technical and organisational measures appropriate to the risk, in accordance with Articles 24, 25 and 32 GDPR, to protect data against unauthorised access, disclosure, alteration, loss or destruction. Depending on the nature of the processing, measures may include access controls, user-rights management, backups, encryption or pseudonymisation, monitoring and incident-response procedures.

If data are transferred outside the European Economic Area, the transfer is carried out in compliance with Chapter V GDPR: on the basis of an adequacy decision under Article 45 GDPR or, in its absence, on the basis of appropriate safeguards under Article 46 GDPR, including, where applicable, the standard contractual clauses approved by Commission Implementing Decision (EU) 2021/914. Only in exceptional circumstances may one of the derogations under Article 49 GDPR be used. Information on the applicable mechanism and a copy of the safeguards may be requested using the contact details, subject to the protection of confidential information.

VI. RIGHTS OF DATA SUBJECTS

Subject to the conditions laid down in the GDPR, you have the rights set out below. To exercise them, you may submit a request using the contact details indicated in Section 1.1. We may request additional information strictly necessary to confirm the requester's identity. We will respond without undue delay and,

as a rule, within one month of receipt; this period may be extended by up to two months, taking into account the complexity and number of requests, in which case we will inform you within the first month, in accordance with Article 12 GDPR. Exercising these rights is generally free of charge, subject to the circumstances provided for in Article 12(5) GDPR.

6.1. Right of access

You have the right to obtain confirmation as to whether or not we process your personal data and, where we do, access to those data and to the information provided for in Article 15 GDPR, including the purposes of processing, categories of data, recipients or categories of recipients, retention period or the criteria used to determine it, the existence of the rights to rectification, erasure, restriction and objection, the right to lodge a complaint, the source of the data where they were not collected directly from you, and relevant information about any automated decision-making. You also have the right to obtain a copy of the data processed, subject to Article 15(3) and (4) GDPR.

6.2. Right to rectification

You have the right to obtain, without undue delay, rectification of inaccurate personal data concerning you and, taking into account the purposes of the processing, completion of incomplete data, including by providing a supplementary statement, in accordance with Article 16 GDPR.

6.3. Right to erasure (“right to be forgotten”)

You have the right to obtain erasure of data concerning you without undue delay in the cases provided for in Article 17 GDPR, including where the data are no longer necessary for the purposes for which they were collected, you withdraw consent and there is no other legal ground, you object to processing and there are no overriding legitimate grounds, or the data have been unlawfully processed. The right to erasure does not apply where processing is necessary, among other things, for compliance with a legal obligation, exercising the right of freedom of expression and information, or establishing, exercising or defending legal claims.

6.4. Right to restriction of processing

You have the right to obtain restriction of processing in the cases provided for in Article 18 GDPR: you contest the accuracy of the data, for the period necessary to verify it; processing is unlawful and you request restriction instead of erasure; we no longer need the data, but you require them to establish, exercise or defend legal claims; or you have objected to processing, pending verification of whether our legitimate grounds override yours. You will be informed before the restriction is lifted.

6.5. Right to data portability

You have the right to receive personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format and to transmit those data to another controller where processing is based on consent or a contract and is carried out by automated means. Where technically feasible, you may request direct transmission to another controller. Exercising this right must not adversely affect the rights and freedoms of others, in accordance with Article 20 GDPR.

6.6. Right to object

You have the right to object, on grounds relating to your particular situation, to processing based on Article 6(1)(e) or (f) GDPR, including profiling based on those provisions. In that case, we will no longer process the data unless we demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing is necessary to establish, exercise or defend legal claims. Where data are processed for direct marketing purposes, you may object at any time, including to profiling related to that purpose, and the data will no longer be processed for that purpose, in accordance with Article 21 GDPR.

6.7. Right to withdraw consent

Where processing is based on consent, you have the right to withdraw it at any time, as easily as you gave it. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal, in accordance with Article 7(3) GDPR.

6.8. Right not to be subject to a decision based solely on automated processing

You have the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects concerning you or similarly significantly affects you, subject to the exceptions and safeguards provided for in Article 22 GDPR. As at the date of this Policy, the Controllers do not carry out such automated decision-making processes within the processing activities described here.

6.9. Right to lodge a complaint and right to a judicial remedy

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the Romanian National Supervisory Authority for Personal Data Processing (ANSPDCP), particularly in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of your data infringes the GDPR. ANSPDCP's contact details are: 28–30 General Gheorghe Magheru Boulevard, District 1, postal code 010336, Bucharest; email: anspdcp@dataprotection.ro; telephone: +40 318 059 211 / +40 318 059 212; fax: +40 318 059 602; website: www.dataprotection.ro. Your right to apply to the competent courts remains unaffected, pursuant to Articles 78 and 79 GDPR.

VII. AUTOMATED DECISION-MAKING

As at the date of this Policy, the Controllers do not make, within the processing activities described here, decisions based solely on automated processing, including profiling, that produce legal effects concerning the data subject or similarly significantly affect that person.

VIII. POLICY UPDATES

This version is effective as of 1 October 2026. The Policy may be updated to reflect legislative, operational or technological changes. The updated version will be published on the Platform, indicating the date of the latest update. If the changes significantly affect data subjects, we will use reasonable means to inform them.