

## Probi Group Data Protection Policy

Approved by the Management

This is a summary version of Probi's internal policy. This document only presents the main objectives of the policy.

The **Probi Group Data Protection Policy** outlines the company's commitment to safeguarding personal data in compliance with the **General Data Protection Regulation (GDPR)** and other applicable data protection laws. Here is a one-page summary of its key points:

### 1. Purpose and Scope

Probi aims to protect the privacy of individuals whose data it handles and ensure that all processing complies with GDPR and relevant national laws. The policy applies to all employees and covers all personal data processed by Probi entities globally.

### 2. Key Principles

Probi adheres to GDPR's core principles for processing personal data:

- **Lawfulness, fairness, and transparency:** Data is processed only with legal grounds, transparently informing individuals.
- **Purpose limitation:** Data is collected for specified, legitimate purposes.
- **Data minimization:** Only necessary data is processed.
- **Accuracy:** Probi ensures data accuracy and updates.
- **Storage limitation:** Data is retained only as long as necessary.
- **Integrity and confidentiality:** Strong security measures are in place to protect data from unauthorized access.

### 3. Legal Grounds for Processing

Probi processes personal data based on:

- Performance of a contract,
- Compliance with legal obligations,

- Legitimate interests, or
- Obtained consent.

#### **4. Sensitive Data**

Special categories of data (e.g., health, genetic data) are given additional protection and processed only under strict legal conditions, such as explicit consent.

#### **5. Data Subject Rights**

Individuals have the right to access their data, request correction or deletion, object to processing, and transfer their data (data portability).

#### **6. International Data Transfers**

Data transfers outside the EU/EEA are only permitted if sufficient protection (e.g., adequacy decisions, standard contractual clauses) is ensured.

#### **7. Security and Breach Notification**

Probi employs technical and organizational measures to secure personal data. Data breaches must be reported to authorities within 72 hours if there is a risk to individuals' rights.

#### **8. Internal Responsibility**

Each Probi entity is responsible for complying with the policy. A designated person is responsible for overseeing data protection compliance, supported by regular training and audits.

This policy establishes a framework for all Probi companies to manage personal data responsibly, reducing risks and ensuring regulatory compliance.