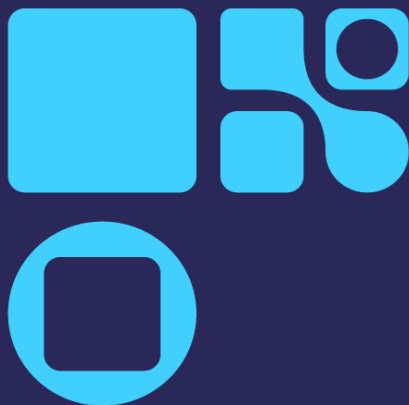




PRIVACY AND DATA PROTECTION POLICY

SIRMA GROUP JSC

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PRIVACY AND DATA PROTECTION POLICY

Chapter I. General Provisions

Art. 1. (1) This Privacy and Data Protection Policy (the “Policy”) explains how Sirma Group JSC (the “Company”) processes the personal data of visitors to its websites and of persons who contact it, on what basis and for what purposes, to whom it discloses the data, how long it keeps them and what rights individuals have.

(2) The Policy applies to the website www.sirma.com and any other websites operated by the Company, including investor relations contacts. Its subsidiaries (together with the Company, the “Group”) are separate controllers of the data they process through their own websites and services.

(3) The Policy does not cover the processing of data of employees and job applicants, which is governed separately. Data in whistleblowing reports are processed under the Internal Rules for Reporting Violations.

Art. 2. (1) The controller of personal data is Sirma Group JSC, a public company registered with the Commercial Register of the Registry Agency under UIC 20010236, with its seat and registered address at 135 Tsarigradsko Shose Blvd., Sofia, tel. 02 9768310, e-mail office@sirma.com, website www.sirma.com.

(2) For questions about personal data and to exercise the rights under Chapter VI, you may contact the Company at gdpr@sirma.com. The Company has appointed a data protection officer, who can be reached at the same address.

Art. 3. For the purposes of the Policy:

1. “personal data” means any information by which a natural person is identified or can be identified, directly or indirectly;
2. “data subject” means the natural person to whom the personal data relate;
3. “processing” means any operation performed on personal data, such as collection, recording, organisation, storage, alteration, use, disclosure, restriction, erasure or destruction;
4. “controller” means the person that determines the purposes and means of the processing;
5. “processor” means a person that processes personal data on behalf of the controller under a contract pursuant to Art. 28 GDPR; the Company’s employees are not processors;
6. “user” means a person who visits the Company’s websites, registers on them or otherwise contacts the Company;
7. “GDPR” means Regulation (EU) 2016/679, “PDPA” means the Bulgarian Personal Data Protection Act, and “CPDP” means the Commission for Personal Data Protection.

Art. 4. The Company processes personal data lawfully, fairly and transparently; only for specific and declared purposes; to the extent necessary for those purposes; accurately and up to date; for no longer than necessary; and in a manner that ensures appropriate security (Art. 5 GDPR). The Company is responsible for compliance with these principles and is able to demonstrate it.

Chapter II. Data, Purposes and Legal Bases

Art. 5. (1) Data you provide. On registration the Company collects first and last name, e-mail address, password and other data depending on the website concerned. For an enquiry, subscription or contact, the data you have provided are processed.

(2) Providing data is voluntary, except where it is necessary for a specific service such as registration; without it the service cannot be provided.

(3) Information you share publicly on the websites may be seen and used by other visitors, and the Company cannot prevent this.

Art. 6. (1) Data collected automatically. When you visit a website, the Company's server records in log files your IP address, internet service provider, browser and device, date and time, pages visited and time spent.

(2) The IP address is treated as personal data. The Company uses it for website security and to detect and prevent abuse and, on a lawful request from a competent authority, to establish identity. Traffic analysis is carried out only under the conditions of Art. 11.

Art. 7. (1) Social media. The Company maintains profiles on social networks and may include features of those networks, such as share buttons, in its websites. When you log in with a social network account, its provider informs you which data it shares with the Company (for example name, e-mail address, photo); the Company processes only the data permitted.

(2) For the Company's pages on social networks and for embedded content, the Company and the platform provider may be joint controllers under Art. 26 GDPR. Processing by the provider is governed by its own policy, which you should read.

Art. 8. (1) The Company processes personal data only for the purposes below and on the stated basis.

Purpose	Data	Legal basis (GDPR, Art. 6(1))	Retention
Registration and account management, support	first and last name, e-mail, login data	performance of a contract – point (b)	while the account exists; deleted on its closure
Newsletter and Company information	name, e-mail	consent – point (a)	until unsubscription or withdrawal of consent
Marketing messages and third-party information	name, e-mail	consent – point (a)	until withdrawal of consent
Investor relations: enquiries, communication relating to the general meeting	name, contact details, shareholder status, content of the enquiry	legitimate interest – point (f); statutory obligations of a public company – point (c)	3 years after the last contact; as required by law for data the law requires
Website security and prevention of abuse	IP address, log file data	legitimate interest – point (f)	90 days
Statistics and improvement of the websites	cookies and device identifiers, behaviour on the site	consent – point (a)	as per Art. 11

Purpose	Data	Legal basis (GDPR, Art. 6(1))	Retention
Compliance with legal obligations, establishment of legal claims	data as the case requires	legal obligation – point (c); legitimate interest – point (f)	as required by law or limitation periods

(2) The Company does not process data for new purposes incompatible with the original ones without informing you in advance and, where necessary, obtaining new consent.

Art. 9. (1) **Consent.** Where the basis is consent, it is given separately for each purpose by a clear affirmative act, for example ticking a box that is not pre-ticked. Refusal does not make unavailable a service that does not require the data.

(2) Consent may be withdrawn at any time, as easily as it was given: through the unsubscribe link in every message, in the account settings or at gdpr@sirma.com. Withdrawal does not affect processing up to that moment; it may make it impossible to use services that depend on the consent.

(3) The Company keeps evidence of consent (date, scope and manner of giving).

Art. 10. (1) Where processing is based on consent in relation to information society services offered directly to a child, a child who has reached the age of 14 may give consent within the meaning of the PDPA; for a child under 14, the consent of the parent or guardian is required (Art. 25c PDPA).

(2) The Company's websites are not directed at children. An account created by a child without the required consent is deleted without undue delay after the Company is informed of it.

Chapter III. Cookies and Similar Technologies

Art. 11. (1) Cookies are small files that a website stores on your device; similar technologies, such as web beacons, collect information about visits. Their use requires information and, except for strictly necessary ones, prior consent.

(2) **Strictly necessary** cookies ensure that the websites work, for example login, remembering your registration and chosen preferences, and security. They are used without consent.

(3) **All other** cookies – for statistics, and advertising and analytics cookies of third parties – are used only after consent given through the banner on the first visit. Refusing is as easy as accepting, and the choice can be changed at any time.

(4) The types of cookies used by the website are:

Category	Purpose	Basis	Duration
Strictly necessary	login, remembering registration and preferences, security	no consent required	session or up to 12 months
Statistics	anonymised statistics on the use of the website, to improve it	consent	up to 13 months
Advertising and third-party	counting ad impressions and tailoring ads to your interests, if used	consent	up to 13 months

(5) The Company has no access to third-party cookies, and third parties have no access to the Company's. Third parties that place cookies have their own privacy policies.

(6) You can delete cookies or block them in your browser settings. This may limit the functions of the websites.

Chapter IV. Recipients and Transfers of Data

Art. 12. (1) The Company does not sell personal data or provide them for payment.

(2) Data may be disclosed only:

1. to processors acting on the Company's instructions and under a contract pursuant to Art. 28 GDPR – hosting and IT support providers, newsletter and statistics tools;
2. to other companies of the Group, where necessary for the specific purpose and there is a basis for the processing;
3. to professional advisers, such as auditors and lawyers, under a duty of confidentiality; and
4. to courts, the prosecutor's office, the Financial Supervision Commission and other state authorities, where required by law.

Art. 13. The Company does not transfer personal data outside the European Economic Area. If this becomes necessary, the transfer will take place only under a European Commission adequacy decision, standard contractual clauses or another mechanism under Chapter V GDPR, and the Policy will be updated.

Chapter V. Retention and Security

Art. 14. After the periods under Art. 8 and Art. 11 expire, the data are deleted or anonymised. Data needed to establish legal claims or required by law are kept for the limitation period or the period set by law.

Art. 15. (1) The Company applies appropriate technical and organisational measures to protect personal data. Data are transmitted over a secure connection (TLS), passwords are stored only in hashed form, and access is limited to employees who need it for their work and are bound to confidentiality.

(2) Transmission of information over the internet is never completely secure; the Company makes every effort but cannot guarantee absolute security.

Art. 16. In the event of a personal data breach that is likely to result in a risk to the rights and freedoms of individuals, the Company notifies the CPDP within 72 hours of becoming aware of it and, where the risk is high, also the individuals concerned without undue delay (Art. 33 and 34 GDPR). Breaches are documented in an internal register.

Chapter VI. Rights of Individuals

Art. 17. You have the following rights regarding your personal data:

1. **access** – to obtain confirmation whether we process data about you, a copy of the data and information on the purposes, categories of data, recipients and retention period;
2. **rectification** of inaccurate data and completion of incomplete data;

3. **erasure** (the “right to be forgotten”) where the data are no longer necessary for the purposes for which they were collected, where you withdraw consent, where you object successfully, where they are processed unlawfully or where the law requires erasure;
4. **restriction** of processing, for example while the accuracy of the data or your objection is being verified;
5. **portability** – to receive the data you have provided in a structured, commonly used and machine-readable format and to transmit them to another controller, where they are processed on the basis of consent or a contract by automated means;
6. **objection** to processing based on legitimate interest and, at any time and without giving a reason, to direct marketing;
7. **withdrawal of consent** under Art. 9(2); and
8. not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects for you. The Company does not take such decisions.

Art. 18. (1) The rights are exercised by a free-form request to gdpr@sirma.com or to the address under Art. 2(1), containing at least: your names and the data that identify you (for registered users, the registration e-mail), a description of the request, the website it concerns and the preferred form of reply.

(2) The Company may request additional information if necessary to establish your identity.

(3) The request is free of charge. For manifestly unfounded or excessive requests the Company may charge a reasonable fee or refuse, stating its reasons.

(4) The Company replies within one month of receipt. For a complex request or a large number of requests, the period may be extended by up to two months, and we will inform you of this and of the reasons within the first month.

(5) If we do not comply with the request, we will state the reasons and the possibility of a complaint under Art. 20.

Art. 19. In your account you can edit and delete data that are not mandatory for using the website and manage your subscriptions. You can unsubscribe from a newsletter through the link at the end of every message.

Art. 20. You have the right to lodge a complaint with the Commission for Personal Data Protection (Art. 77 GDPR and the PDPA): 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592, www.cpdp.bg, kzld@cpdp.bg. A complaint may be lodged within 6 months of becoming aware of the violation, but not later than 2 years after it was committed; anonymous complaints are not considered (Art. 38 and 38a PDPA). You also have the right to judicial remedy. We ask, but do not require, that you contact us first so that we can resolve the matter.

Chapter VII. Transitional and Final Provisions

- § 1.** The Policy is adopted by the Board of Directors of Sirma Group JSC and enters into force on the day after its adoption. Amendments and supplements are made in the same manner.

- § 2. The Policy is reviewed at least once a year and upon a material change in the Company's activities, the tools it uses or the legislation, including at European Union level. The current version is published at www.sirma.com; material changes are communicated to registered users.
- § 3. The Policy was first adopted in November 2015 by the Board of Directors. The Company's name in the Policy was updated to Sirma Group JSC pursuant to a resolution of the General Meeting of Shareholders of 18.06.2026. This Policy fully replaces the previous Privacy and Personal Data Retention Policy.
- § 4. Matters not regulated herein are governed by the GDPR, the PDPA and other applicable law, which prevail over the Policy where they differ.

Amendment history

Date	Decision	Amendment
November 2015	Decision of the Board of Directors	Adoption of the Privacy and Personal Data Retention Policy
18.06.2026	Resolution of the General Meeting of Shareholders	Change of the Company's name to Sirma Group JSC (§ 3); new version of the Policy

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