

Policy

Data Privacy

deugro is firmly committed to conducting its business in accordance with the highest standards of ethics and integrity, including full compliance with applicable data protection and privacy laws. This Policy sets out the principles and commitments governing the processing of personal data across our organization and serves as a reference framework for defining, reviewing, and aligning privacy-related objectives.

In doing so, deugro recognizes its responsibility to protect the personal data and privacy of its employees, customers, suppliers, business partners, contractors, and any other individual whose personal data it processes.

This Policy applies to all deugro entities worldwide and to all personnel, including employees, temporary staff, contractors, and other authorized parties. All individuals covered by this Policy are required to comply with its provisions when processing personal data.

To uphold this commitment, all activities involving the processing of personal data, as well as the design and implementation of related processes, shall be carried out in accordance with the fundamental data protection principles set out below:

a) Lawfulness, fairness, and transparency

Personal data shall be processed on a valid legal basis and in a fair and transparent manner. deugro shall make sure that individuals are appropriately informed about how and why their personal data is processed, in accordance with applicable data protection laws.

b) Purpose limitation

Personal data shall be collected for specified, explicit, and legitimate purposes and shall not be further processed in a manner incompatible with those purposes, unless otherwise permitted or required by applicable law.

c) Data minimization

deugro companies shall limit the processing of personal data to what is adequate, relevant, and necessary for the purposes for which it is processed. Where feasible, deugro shall rely on data that does not directly identify individuals.

d) Privacy by design and by default

deugro companies shall integrate data protection and privacy requirements into the design and development of business processes, products, services, and information systems from an early stage and throughout their lifecycle (privacy by design).

By default, deugro companies shall ensure that personal data is processed using privacy-friendly default settings, so that, without the individual's intervention, only personal data which is necessary for the specific purpose is collected, processed, retained, and made accessible, taking into account the nature, scope, context, and purposes of the processing, as well as the associated risks (privacy by default).

e) Accuracy

Reasonable steps shall be taken to ensure that personal data is accurate, complete, up to date, and reliable for its intended use.

f) Integrity and confidentiality

Appropriate technical and organizational measures shall be implemented to safeguard personal data against unauthorized access, disclosure, or other unauthorized or unlawful processing, as well as against accidental loss, destruction, or damage. Such measures shall consider the risks associated with the processing, the nature of the personal data, the state of the art, and the cost of implementation, in order to ensure an appropriate level of security.

g) Storage limitation

Personal data shall be retained only for as long as necessary to fulfill the specified purposes, applicable legal and regulatory requirements, and legitimate business needs. Retention periods shall be determined in accordance with applicable record retention schedules and internal policies, after which personal data shall be securely deleted, anonymized, or otherwise disposed of in an appropriate manner.

Where deugro companies rely on third parties to process personal data on their behalf, such processors shall be carefully selected and subject to appropriate contractual and organizational controls to ensure the confidentiality, integrity, and security of the personal data, as well as compliance with all applicable legal requirements.

This policy undergoes periodic reviews, occurring at least annually, to ensure its sustained effectiveness and relevance. During each review, careful consideration is given to evolving legal, regulatory, and organizational requirements. The review process is designed to maintain the policy's alignment with these changes, without compromising the stability of the fundamental data protection principles on which the policy is founded.

If you have any questions or concerns regarding privacy matters, the processing of personal data, or the exercise of rights under applicable data protection laws, please contact: infosec.privacy@deugro-group.com

This policy first took effect in February 2026 and is reviewed annually.

Klaus Strahmann
Co-CEO
Hanau, February 2026.