

APPROVED BY THE RESOLUTION OF THE BOARD OF THE COMPANY

DATED 16 OCTOBER 2025

PRIVACY POLICY

OF

PRIVATE COMPANY OF ASTANA INTERNATIONAL FINANCIAL CENTRE

DP GLOBAL GROUP LIMITED

Chapter 1. General provisions	3
Chapter 2. Principles of Personal Data processing	3
Chapter 3. Main categories of Personal Data processing in Company	4
Chapter 4. Personal Data Subject Rights	4
Chapter 5. Notifying Personal Data Subject	5
Chapter 6. Recordkeeping of Personal Data operations	6
Chapter 7. Commissioner notifications	6
Chapter 8. Personal Data Controllers	7
Chapter 9. Security measures	7
Chapter 10. Final provisions	8
Annex A	9
Annex B	10
Annex C	12
Annex D	13

Chapter 1. General provisions

1. This Privacy Policy (the "Policy") has been developed in accordance with the AIFC Data Protection Regulations 2017 (the "Regulations") and other applicable AIFC data protection legislation, as well as the internal regulatory documents of DP Global Group Limited (BIN: 250640900326; Address: Astana, Yesil district, A. Bokeikhan street, 25B (block D), room number - 8, Z19Y8M) (the "Company").
2. This Policy incorporates the key definitions and abbreviations set forth in the Regulations and other applicable AIFC data protection legislation, internal regulatory documents of the Company.
3. The Policy defines the terms of processing personal data by the Company, including, but not limited to, information about
 - a. principles of Personal Data processing;
 - b. purposes and period of Personal Data processing;
 - c. classification of Personal Data and Personal Data Subjects;
 - d. rights of personal data subjects with regard to processing of their personal data by the Company;
 - e. procedure for notifying the Personal Data Subject about the Company identification information and other details;
 - f. procedure for recordkeeping of operations related to the Personal Data processing carried out by the Company or on its behalf;
 - g. procedures for notifying the Commissioner of Data Protection (the "Commissioner") regarding operations involving the Processing of Sensitive Personal Data and other Personal Data operations as required by the Regulations.
 - h. personal data protection measures;
4. All subsequent changes and additions to this Policy will be reviewed and approved by the Chief Executive Officer (CEO). Approved amendments shall come into force upon signing and shall be binding on all employees of the Company and employees of affiliated persons acting on behalf of the Operator in accordance with clause 1 of Chapter 8.

Chapter 2. Principles of Personal Data processing

1. The Company processes Personal Data in accordance with the fundamental principles of data protection as stipulated by the Regulations, including but not limited to, fairness, lawfulness, and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality, and accountability.
2. Personal Data are processed by the Company for specified, explicit, and legitimate purposes (Principle of Purpose Limitation) and shall not be further Processed in a manner incompatible with those purposes. Any further Processing for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes shall not be considered to be incompatible with the initial purposes.
3. Personal Data processed shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are Processed (Principle of Data Minimisation).
4. The Company ensures that the Personal Data being processed by it are:
 - accurate and updated, whenever necessary;
 - kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data are Processed (Principle of Storage Limitation). Personal Data may be stored for longer periods insofar as the Personal Data will be

Processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to implementation of appropriate technical and organisational measures or as required by applicable legislation.

5. The Personal Data received by the Company are Processed based on a lawful basis as stipulated by the Regulations, which may include, but is not limited to, the explicit consent of the Data Subject, necessity for the performance of a contract, compliance with a legal obligation, protection of vital interests, performance of a task carried out in the public interest or in the exercise of official authority, or for the legitimate interests pursued by the Company or a Third Party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject.
6. The Data Subject has the right to request access to their Personal Data Processed by the Company, as well as the right to request rectification, erasure ('right to be forgotten'), or restriction of Processing of their Personal Data, as further detailed in Chapter 4 of this Policy.

Chapter 3. Main categories of Personal Data processing in Company

1. Process, in relation to Personal Data, means perform any operation or set of operations on the Personal Data, whether or not by automatic means, and includes, for example, the collection, recording, organisation, storage, adaptation or alteration, retrieval, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction of the Personal Data.
2. Details of the main personal data subjects, processing purposes, as well as third parties to whom such personal data are transferred are provided in the respective Annexes
 - a. Classes of personal data subjects – Annex A.
 - b. Purposes of personal data processing – Annex B.
 - c. Categories of Personal Data – Annex C
 - d. Third parties to whom personal data is transferred – Annex D.
3. The Company does not Process Sensitive Personal Data. However, in specific circumstances, where legally required (e.g., based on requests from state authorities or other legal obligations), or with the explicit consent of the Data Subject, the Company may collect and Process Sensitive Personal Data in strict compliance with the Regulations and applicable AIFC legislation. The company conducts regular audits (at least annually) to confirm that sensitive data is not processed without a legal basis
4. Personal Data Subjects' Personal Data shall not be used for purposes other than those provided for in Annex B.
5. Personal Data are Processed by the Company for the duration of the contractual or legal relationship between the Data Subject and the Company, and subsequently retained for a period of three (3) years after the termination of such relationship, or for such longer period as may be required by applicable AIFC legislation or for the establishment, exercise or defence of legal claims. Data is retained on appropriate media (electronic, paper, and/or other tangible media).

Chapter 4. Personal Data Subject Rights

1. A Data Subject has the right:
 - a. to object at any time, on grounds relating to their particular situation, to the Processing of Personal Data concerning them, including profiling, unless the Processing is necessary for the performance of a task carried out for reasons of

- public interest, or for the legitimate interests pursued by the Company or a Third Party or in accordance with applicable legal requirements;
 - b. to be informed before Personal Data is first disclosed to a Third Party or used on a Third Party's behalf for the purposes of direct marketing, and to be explicitly offered the right to object to such disclosure or use, particularly requiring their explicit consent for direct marketing purposes.
2. If the Data Subject raises a justified objection to the processing of their personal data, the Data Controller shall no longer process that personal data unless the processing is necessary for the performance of a task carried out in the public interest or for the legitimate interests pursued by the Company or a Third Party, or as required by law;
 3. A Data Subject has the right to obtain from the Data Controller, upon request, at reasonable intervals and without undue delay or expense:
 - a. Written confirmation about whether or not Personal Data relating to A is being Processed and Written information at least about the purposes of any Processing, the categories of any Personal Data being Processed, and the Recipients or categories of Recipients to whom any Personal Data is disclosed; and
 - b. communication in an intelligible form of the Personal Data being Processed and of any available information about its source; and
 - c. as appropriate, the rectification, erasure ('right to be forgotten'), or restriction of Processing of Personal Data if the Processing of the Personal Data contravenes the Regulations.
 4. In the event of a Personal Data Breach that poses a high risk, the data subject will be notified as soon as possible under the circumstances, with a description of the nature of the incident and the measures taken to resolve it.

Chapter 5. Notifying Personal Data Subject

1. Unless the Data Subject is already aware of the information (e.g., through prior disclosures in contractual agreements or terms of service), the Company provides the Data Subject with the following information at the time Personal Data is collected, or, if the Personal Data is not obtained directly from the Data Subject, within a reasonable period after obtaining the Personal Data, but no later than one month, having regard to the specific circumstances of the Processing:
 - a. the Company's identification information;
 - a. the purposes of processing for which the Personal Data are collected;
 - b. information required to ensure fair Personal Data processing (having regard to particular Personal Data collection circumstances), including, for example:
 - c. the recipients or categories of recipients of the Personal Data;
 - d. whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the Data Subject is obliged to provide the Personal Data and of the possible consequences of failure to provide such data;
 - e. the existence of the right to request from the Data Controller access to and rectification or erasure of Personal Data or restriction of Processing concerning the Data Subject or to object to Processing as well as the right to data portability;
 - f. whether the Personal Data processing general requirements or the Sensitive Personal Data processing requirements will be observed in the course of processing.
2. Notification of the Personal Data Subject about the information specified in clause 1 of this Regulation is carried out by publishing the relevant information on the Company's Internet resource (dodobrands.io section "Invesotrs").

Chapter 6. Recordkeeping of Personal Data operations

1. The Company retains the following records of the Personal Data processing operations carried out by the Company or on its behalf:
 - a. description of the Personal Data processing operations;
 - b. explanation of the purpose of the Personal Data processing operations;
 - c. identities of the Personal Data Subjects which Personal Data are related to or, in case operations pertain to the category of the Personal Data Subjects, description of the category of the Personal Data Subjects;
 - d. description of the category of the Personal Data being processed;
 - e. a list of jurisdictions outside the AIFC to which the Company transfers or intends to transfer Personal Data, along with an assessment of whether each such jurisdiction provides an adequate level of Personal Data protection as determined by the AIFC Data Protection Regulations 2017.
2. The Company maintains records of processing activities (RoPA) on a regular basis and ensures that changed transactions are updated. Any personal data subject who believes that the company is processing his or her personal data, may send a written request for the records of processing activities (RoPA) to the e-mail address specified in paragraph 3 of Chapter 10.

Chapter 7. Commissioner notifications

1. The Company is obliged to notify the Commissioner of Data Protection (the "Commissioner") of the details of the following Personal Data Processing operations performed or to be performed by the Company or on its behalf:
 - a. any Sensitive Personal Data processing operation (or a set of such operations);
 - b. any Personal Data processing operation (or a set of such operations) which provides for transfer of the Personal Data to a recipient located in the jurisdiction outside AIFC in case such jurisdiction does not have an adequate level of the Personal Data protection pursuant to the requirements Data Protection Regulations N° 10 adopted by the AIFC on 20 December 2017.
2. Notification required by paragraph 1 of Chapter 7 must include information as follows:
 - a. general description of the Personal Data processing operations;
 - b. explanation of the purpose of the Personal Data processing operations;
 - c. identities of the Personal Data Subjects which the Personal Data are related to or in case operations pertain to the category of the Personal Data Subjects, description of the category of the Personal Data Subjects;
 - d. description of the category of the Personal Data being processed;
 - e. jurisdictions outside AIFC, where the Company transfers or will be transferring Personal Data to, as well as information about each of such jurisdictions as to whether such jurisdiction has an adequate level of the Personal Data protection pursuant to the requirements of Data Protection Regulations No.10 adopted by the AIFC on 20 December 2017.
3. Notification required by paragraph 1 of Chapter 7 must be submitted to the Commissioner not later than 14 calendar days after the commencement of operations, and in case such operations will last more than a year since the day of notification - every following year on a day when the first notification was provided.
4. The Company notifies the Commissioner of changes in information about the Personal Data processing operations no later than 14 days since the day of the changes.

Chapter 8. Personal Data Controllers

1. The Company has the right to entrust the processing of personal data to third parties and/or affiliates on the basis of a data processing agreement (DPA).

In exercising this right, Dodo Franchising LLC (OGRN 1131101001844, registered office: 16 Oktyabrsky Prospekt 16, Syktyvkar, Komi Republic, Russian Federation), being a subsidiary of DP Global Group Ltd, carries out its activities on the basis of the instruction issued by the Company.

In addition to personal data protection functions, Dodo Franchising Ltd on the basis of the order comprehensively provides all human resources, legal, administrative, accounting and financial functions, as well as is responsible for information and general security.

2. The Company remains ultimately responsible to Data Subjects for the actions of Data Processors.
3. Engagement of Sub-subprocessors by third parties acting on behalf of the Controller to achieve the goals specified in Annex B of the Policy is possible only with the prior written consent of the Controller. .

Chapter 9. Security measures

1. The Company takes the following measures to protect the personal data of personal data subjects:

Category of Measures	Description
Legal Measures	1) Development of local acts implementing legislative requirements in the field of personal data protection. 2) Conclusion of confidentiality agreements and agreements on personal data protection measures with third parties who have access to personal data. 3) Refusal to use any methods of personal data processing that do not comply with the principles, purposes, and legislative requirements defined in the Policy.
Organizational Measures	1) Appointment of a person responsible for ensuring the security of personal data in personal data information systems.¹ 2) Limiting the number of individuals who have access to personal data and organizing a permission-based access system.² 3) Regulation of personal data processing procedures.³ 4) Segregation of personal data from other information by recording it on separate media⁴. 5) Division of personal data into publicly available and restricted-access categories. 6) Organization of accounting for material carriers of personal data and their storage, ensuring the prevention of theft, substitution, unauthorized copying, and destruction.

¹ The person responsible for ensuring the security of personal data in personal data information systems is appointed by Dodo Franchising LLC from among its employees (Chapter 8 of the Policy).

² Documents containing personal data are stored on Google Drive and in a safe. Access to Google Drive and the safe is strictly limited: Google Drive - 13-15 people, Safe - 4-5 people. Access to personal data carriers is provided exclusively upon request and with justification of the need for such access.

³ The company has adopted internal rules on how data is stored, who processes it and how, and who has access to it.

⁴ Shareholder and option holder data is stored in a separate folder, separate from all other folders.

	7) Regular identification and assessment of Personal Data security threats, including the development of threat models for information systems, and the implementation of appropriate risk mitigation strategies.
Technical Measures	1) Registration and accounting of actions performed with personal data by users of information systems where personal data is processed. ⁵ 2) Implementation of role-based access control (RBAC) and granular permissions for API access to Personal Data

Chapter 10. Final provisions

1. All employees of the Company and its affiliates who have access to Personal Data as part of their job duties are responsible for compliance with the requirements of this Policy.
2. Issues not explicitly regulated by this Policy shall be resolved in accordance with the AIFC Data Protection Regulations 2017, other applicable AIFC legislation, and/or internal regulatory documents of the Company.
3. For any inquiries or requests concerning the Processing of Personal Data, Data Subjects may submit a written communication to the Company via the following e-mail address: gr.legal@dodpizza.com. Contact for requests from Data Subjects and the Commissioner.

⁵ System administrators have the ability to view event logs in the personal data storage information system.

Annex A

Classes of Personal Data Subject
Individuals who are shareholders of the Company or intend to become shareholders;
Individuals who are the Company's employees or employees of Company's affiliates who have entered into share option agreements to acquire Company shares;
Individuals who provide works or services who had concluded a civil contract with the Company;
Individuals who are members of the Company's governing bodies;
Individuals whose Personal Data are publicly available and processing of such data does not breach their rights and complies with the requirements stipulated by the applicable legislation;
other individuals who expressed consent for their Personal Data to be processed by the Company.

Annex B

Purposes of data processing	Legal Basis
Shareholders	
Performance of customer due diligence (CDD/KYC) of the potential shareholders by the Company to the requirements of the applicable legislation;	Legal requirement
Ensuring compliance with legal requirements applicable to the Company and its affiliates;	Legal requirement
Conclusion of agreements with shareholders (Deeds, Voting agreements, Buyback agreements, and proxy agreements);	Contract
Administration of membership records;	Legal requirement Contract
Execution of financial settlements, including dividend payments, and payment for shares upon share buyback;	Contract
Interaction with shareholders on issues related to keeping the corporate register, including acquisition/sale of shares, share buy-back and other issues arising from them;	Legal requirement Contract
Exchange of information due to consideration of applications, complaints, proposals of the members and provision of replies to them, including when handing over (receiving) correspondence (mail) to be sent (delivered or received) by post, courier;	Contract
Provision of any information materials to the members by the Company by way of notification by telephone, email, as well as any other available communication channels	Legal requirement
Hiring and Work Processes	
Conclusion and execution of an employment contracts; Payment of wages ⁶ ;	Employee Contract
Motivational programs for Dodo Brands Group employees	
Conclusion and execution of option agreements	Contract

⁶ This purpose of processing does not apply if The Company does not have persons with whom an employment contract has been concluded.

Maintaining an internal register of optionees	
Optionee engagement	
<i>Management in a legal entity</i>	
Conclusion and execution of Service agreement for management in Company; Maintaining a public register of directors and officers; Fee payment;	Contract
<i>Counterparty</i>	
Conclusion and execution of civil law contracts with individuals who provide works or services to the Company;	Contract
<i>Other purpose</i>	
Provision of reports and/or information by the Company to the authorized state bodies, the AIFC bodies, auditing, consulting, appraisal and other professional organizations, affiliates of the Company, Company's counterparties, as well as receipt of the reports and/or information by the Company from the said parties;	Legal requirement
Provision of Personal Data to affiliates of the Company and third parties to implement cooperation in the field of information technology, information security and integration of information assets, subject to the applicable law;	Legal requirement
The Company's compliance with the requirements of the applicable legislation for retention and accounting of data and information;	Legal requirement
Fulfillment of any other requirements of the applicable legislation by the Company.	Legal requirement

Annex C

Categories of Personal Data
Passport Data: • Full name • Date and place of birth • Nationality, registration address; • Date of issue, by whom and where issued • Expiration date
Tax ID;
Phone numbers and accounts in social networks/messengers;
Accounts in social networks
E-mail;
Bank details;
CV information: • Place of employment and position held; • Information about previous places of employment; • Education details; • Marital status; • Financial status/property information; • Social media account information; • Interests; • Information about business and other personal qualities of an evaluative nature;
Information on shareholding and voting rights;

Annex D

Third parties/Processor	Jurisdiction	Legal Basis	Adequate/ Non adequate	Purpose
Dodo Franchising Limited Liability Company	Russian Federation	The transfer is carried out on the basis of the consent of the data subject / for the fulfillment of contractual or legal obligations and with the permission of the Commissioner	Non adequate	Dodo Franchising Limited Liability Company, as a subsidiary of DP Global Group Ltd, comprehensively provides all human resources, legal, administrative, accounting and financial functions, as well as being responsible for the information and general security of the group's operations.
TSATR – Audit Services LLC	Russian Federation		Non adequate	Conducting audits of the Company's activities and reporting
Private company Legal Consulting Community Limited	AIFC		Adequate	Subscription-based legal corporate support