

Privacy Policy

Massa Compute — Website & Investor Relations Data Processing Notice

Effective date: 18 August 2026 | Last updated: 18 August 2026 | Version 1.0

This Privacy Policy explains how **[Massa Compute OOD / EOOD — full legal name to be inserted]**, a company incorporated under the laws of the Republic of Bulgaria, with registered address at **[registered address]** and Unified Identification Code (EIK/**[EIK number]**) **[EIK number]** (“Massa Compute”, “we”, “us”), collects, uses, discloses, and protects personal data of visitors, prospective partners, investors, and job applicants who interact with our website at **[massacompute.com]** (the “Website”) and related communication channels.

We process personal data in accordance with Regulation (EU) 2016/679 (the “GDPR”), the Bulgarian Personal Data Protection Act (**[Bulgarian Personal Data Protection Act]**), the Bulgarian Electronic Communications Act (transposing Directive 2002/58/EC, the “ePrivacy” rules on cookies), and other applicable data protection law.

Note on scope. This Policy governs the corporate/investor-facing Massa Compute Website only. It does not cover personal data processed by affiliated ventures (e.g. **[Massa Compute OOD / EOOD]**, AFMIS EOOD) under their own products, which are governed by separate privacy notices.

1. Data Controller and Contact Details

The data controller responsible for the processing described in this Policy is Massa Compute [legal entity name], [registered address], Bulgaria, EIK [•]. For all privacy matters, including to exercise your rights under Section 12, contact:

- Email: **privacy@[massacompute.com]**
- Postal address: [registered address], Bulgaria
- Attention of: [Data Protection Contact / Managing Director name, if a formal Data Protection Officer is not statutorily required]

Massa Compute has assessed whether appointment of a Data Protection Officer (DPO) is mandatory under Article 37 GDPR. Given the current scale and nature of processing (corporate website, investor and partner correspondence — no large-scale or systematic monitoring of individuals, no large-scale special-category processing), a statutory DPO is **not currently required**. This assessment will be revisited as the Website's functionality and data volumes evolve (e.g. if a client/investor portal with behavioural analytics is introduced).

2. Categories of Personal Data We Collect

Category	Examples	Source
Identity & contact data	Name, job title, company/organisation, email, phone number	Provided directly (forms, email, calls, events)
Inquiry & correspondence content	Message text, attachments, meeting notes, call summaries	Provided directly
Investor & partner due-diligence data	Entity name, investment mandate, accreditation status, signatory details on NDAs/Founders' documents, data-room access logs	Provided directly; generated by data-room platform

Category	Examples	Source
Recruitment data	CV/résumé, cover letter, references, interview notes	Provided directly by applicants
Technical & usage data	IP address, device/browser type, pages viewed, referral source, approximate location (city-level), session timestamps	Automatically via cookies/analytics — see Section 5
Marketing preference data	Newsletter subscription status, communication preferences, opt-outs	Provided directly; inferred from engagement

We do **not** intentionally collect special categories of personal data (Art. 9 GDPR — e.g. health, biometric, or political data) through the Website. Please do not include such data in messages to us; if you do, you consent to its processing solely to handle your specific inquiry, and we will delete it once no longer necessary.

3. Purposes of Processing and Legal Bases (Art. 6 GDPR)

Purpose	Legal basis
Responding to inquiries submitted via contact/investor forms or email	Art. 6(1)(b) — pre-contractual steps taken at your request; or Art. 6(1)(f) — legitimate interest in maintaining business relationships
Investor due diligence, NDA administration, and data-room access management	Art. 6(1)(b) — performance of/entry into a contract (e.g. NDA, subscription documents); Art. 6(1)(f) — legitimate interest in protecting confidential information and managing capital-raising
Sending newsletters or investment updates	Art. 6(1)(a) — consent (opt-in; withdrawable at any time)
Website security, fraud prevention, and abuse monitoring	Art. 6(1)(f) — legitimate interest in protecting our systems and users
Analytics cookies (aggregate site-usage insight)	Art. 6(1)(a) — consent, obtained via the cookie banner prior to non-essential cookies being set
Recruitment and candidate evaluation	Art. 6(1)(b) — pre-contractual steps; Art. 6(1)(f) — legitimate interest in evaluating suitability
Compliance with legal, tax, accounting, or AML/KYC obligations	Art. 6(1)(c) — legal obligation
Establishment, exercise, or defence of legal claims	Art. 6(1)(f) — legitimate interest

Where processing relies on legitimate interest, we have balanced that interest against your rights and freedoms and concluded our interest is not overridden; a record of this balancing test is available on request. Where processing relies on consent, you may withdraw it at any time without affecting the lawfulness of processing carried out before withdrawal.

4. Special Note for Investors and Deal Counterparties

Where you engage with Massa Compute as a prospective investor, lender, landowner, or infrastructure partner, personal data you provide (including on behalf of an entity you represent) may be processed for capital raising, due diligence, execution of Founders'/Investment/NDA documentation, and ongoing investor relations. Access to non-public materials (financial models, MOUs, technical specifications) is logged for confidentiality, audit, and security purposes and may itself constitute personal data (e.g. access timestamps linked to your

identity) processed under Art. 6(1)(f) GDPR. Such data is kept confidential and is not used for any purpose beyond the transaction context without your knowledge.

5. Cookies and Similar Technologies

The Website uses cookies and similar technologies (pixels, local storage) in line with the Bulgarian Electronic Communications Act and the ePrivacy Directive. Non-essential cookies are only set after you give affirmative consent via the cookie banner; you can withdraw consent at any time through the cookie-preference control available in the Website footer.

Category	Purpose	Consent required?
Strictly necessary	Core site functionality, load balancing, security (e.g. session, CSRF-protection cookies)	No — exempt under Art. 5(3) ePrivacy
Functional	Remembering language/display preferences	Yes
Analytics	Aggregate, privacy-respecting usage statistics (e.g. pages visited, session length)	Yes
Marketing/retargeting	Currently not deployed. If introduced, will be added here and gated by consent.	Yes (if introduced)

A full, itemised cookie list (name, provider, purpose, duration) is maintained in our Cookie Notice, accessible via the consent banner and at [\[massacompute.com/cookies\]](https://massacompute.com/cookies), and is technically synchronised with the consent-management platform in use.

6. Who We Share Data With

We disclose personal data only to the extent necessary, and always under contractual data-processing terms compliant with Art. 28 GDPR where a recipient acts as our processor:

- **Hosting & infrastructure providers** operating the Website and associated data storage.
- **Email, CRM, and data-room providers** used for correspondence, newsletter delivery, and secure sharing of investor materials.
- **Analytics providers**, where cookie consent has been given.
- **Professional advisers** — legal counsel, auditors, financial and tax advisers — engaged in connection with fundraising, corporate transactions, or compliance.
- **Co-founders, prospective investors, and consortium partners**, strictly on a need-to-know basis and typically under NDA, where relevant to a specific transaction or partnership discussion.
- **Public authorities**, where disclosure is required by Bulgarian or EU law (e.g. tax authorities, courts, data protection authority).

We do not sell personal data, and we do not share personal data with third parties for their own independent marketing purposes.

7. International Data Transfers

Personal data is primarily processed within the European Economic Area (EEA). Where a recipient (e.g. a cloud, analytics, or CRM provider) is located outside the EEA, or an investor/partner is based outside the EEA, we ensure an appropriate safeguard under Chapter V GDPR before transferring data, such as:

- an adequacy decision of the European Commission in respect of the destination country (Art. 45 GDPR); or
- the European Commission's Standard Contractual Clauses (Art. 46(2)(c) GDPR), supplemented where necessary by additional technical and organisational measures following a transfer-impact assessment; or
- another valid transfer mechanism recognised under GDPR (e.g. Art. 49 derogations, used only exceptionally and for specific, narrowly defined situations).

A copy of the relevant safeguard can be requested at the contact details in Section 1.

8. How Long We Keep Your Data

Data category	Retention period
General website inquiries (not converted to a business relationship)	12 months from last contact, then deleted or anonymised
Investor/partner due-diligence & NDA-related data	Duration of the discussion/relationship plus 5 years (Bulgarian Commercial Act / Accountancy Act limitation and audit periods), or longer where required for legal claims (up to the applicable statute of limitations)
Newsletter/marketing data	Until consent is withdrawn (unsubscribe), plus a short suppression-list record kept indefinitely to honour the opt-out
Recruitment data (unsuccessful candidates)	6 months after the recruitment process closes, unless you consent to longer retention for future opportunities
Accounting/tax records arising from investor transactions	10 years, per Bulgarian Accountancy Act ((██████ █ ██████████████████))
Website technical/analytics logs	Up to 14 months (aligned with standard analytics retention limits) or as configured in the analytics tool, whichever is shorter

Where a shorter period is achievable without prejudicing legal, contractual, or accounting obligations, we apply the shorter period, in line with the storage-limitation principle (Art. 5(1)(e) GDPR).

9. Security Measures

We apply technical and organisational measures proportionate to the risk, including: encryption of data in transit (TLS) and, where applicable, at rest; role-based access controls and least-privilege principles for investor data-room access; multi-factor authentication for administrative and data-room accounts; logging and monitoring of access to confidential materials; contractual security obligations imposed on processors; and periodic review of access rights, especially following the close of a fundraising round or partner engagement. No system is completely secure; we maintain an incident-response process aligned with the 72-hour breach-notification duty under Art. 33 GDPR.

10. Automated Decision-Making and Profiling

We do not use your personal data for solely automated decision-making, including profiling, that produces legal or similarly significant effects on you within the meaning of Art. 22 GDPR.

11. Children's Privacy

The Website is directed at business professionals, investors, and job applicants and is not intended for individuals under 16. We do not knowingly collect personal data from children. If you believe a child has provided us with personal data, please contact us so we can delete it.

12. Your Rights Under the GDPR

Subject to the conditions and exceptions set out in the GDPR, you have the right to:

- **Access** — obtain confirmation of, and access to, the personal data we hold about you (Art. 15).
- **Rectification** — request correction of inaccurate or incomplete data (Art. 16).
- **Erasure** (“right to be forgotten”) — request deletion where a legal ground applies (Art. 17).
- **Restriction of processing** — request that we limit processing in certain circumstances (Art. 18).
- **Data portability** — receive data you provided to us in a structured, machine-readable format, and have it transmitted to another controller where technically feasible (Art. 20).
- **Object** — object to processing based on legitimate interest, including profiling, and to direct marketing at any time, free of charge (Art. 21).
- **Withdraw consent** — where processing is based on consent, withdraw it at any time without affecting prior lawful processing (Art. 7(3)).
- **Lodge a complaint** — with the Bulgarian data protection authority or the authority of your habitual residence/place of alleged infringement (Art. 77).

To exercise any of these rights, contact us using the details in Section 1. We will respond within one month of receiving a verifiable request (extendable by two further months for complex requests, with notice to you). We may need to verify your identity before actioning a request.

Supervisory authority (Bulgaria): Commission for Personal Data Protection (Комисия за защита на личните данни, “CPDP”) — 2 Prof. Tsvetan Lazarov Blvd, Sofia 1592, Bulgaria — www.cdpd.bg — kzld@cpdp.bg.

13. Third-Party Links

The Website may link to third-party sites (e.g. LinkedIn, partner websites, data-room platforms). We are not responsible for the privacy practices of those third parties; please review their respective privacy notices before submitting personal data to them.

14. Changes to This Policy

We may update this Policy to reflect changes in our processing activities or legal requirements. Material changes will be indicated by an updated “Last updated” date at the top of this page and, where appropriate (e.g. changes affecting consent-based processing), communicated directly to affected individuals. We encourage you to review this page periodically.

15. Governing Law and Jurisdiction

This Policy is governed by the data protection laws of Bulgaria and the European Union. Any dispute concerning this Policy that cannot be resolved with our privacy team, or with the CPDP, may be brought before the competent Bulgarian courts, without prejudice to your right to seek judicial remedy in your own EU Member State of residence under Art. 79 GDPR.

Contact: Massa Compute — [registered address], Bulgaria — [privacy@\[massacompute.com\]](mailto:privacy@[massacompute.com])

Before publishing: This document is a rigorous drafting baseline, not a substitute for legal sign-off. Before it goes live, (1) insert the final legal entity name, registered address, EIK, and live domain in every bracketed field; (2) confirm actual vendors (hosting, CRM, analytics, data-room platform) and update Sections 6–7 to name them and their transfer safeguards precisely; (3) align the cookie table in Section 5 with your actual consent-management platform's live cookie scan; (4) have Bulgarian GDPR counsel confirm the DPO-necessity conclusion in Section 1 as data volumes grow (e.g. if a client portal with behavioural tracking is added); and (5) adopt this alongside a matching Cookie Notice and, if AFMIS/■■■■ data ever intersects with this site, a cross-reference note between policies.