

PERSONAL DATA PROCESSING NOTICE

[Information for shareholders, entitled persons and their representatives and proxies in relation with the brokerage service for keeping a Shareholder Register]

In connection with the enforcement of the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/WE (General Data Protection Regulation) (“RODO”), Bank Handlowy w Warszawie S.A. operating through its organizationally separate unit being a brokerage office – Brokerage Department of Bank Handlowy (“Bank”) hereby informs of the rules of processing of your personal data and of your rights in connection with such processing of personal data.

If you have any questions concerning the manner and scope of processing of your personal data by the Bank or your rights, please contact the Bank at our registered address, ul. Senatorska 16, 00-923 Warsaw, or contact the Data Protection Officer via email at: daneosobowe@bankhandlowy.pl or by post to the following address: ul. Senatorska 16, 00-923 Warsaw.

I. Designation of Data Controller

The data controller of your personal data is Bank Handlowy w Warszawie S.A. operating through its organizationally separate unit being a brokerage office – Brokerage Department of Bank Handlowy, with its registered office in Warsaw, ul. Senatorska 16, 00-923 Warsaw, Poland.

II. Purposes and legal basis of processing of your personal data

The Bank processes your personal data for the following purposes:

1. performance of instructions related to the service of keeping a Shareholder Register by the Bank for companies (Issuers) of which you are a Shareholder, or you have the status of a person entitled to submit instructions or you are a representative or proxy of the above-mentioned entities, in particular making entries in the Shareholder Register (Article 6(1)(c) of the GDPR);
2. for the purposes of being compliant with legal obligations borne by the Bank in relation with conducting brokerage activities, including:
 - a) resulting from the provisions of law regulating the performance of brokerage activities, including in particular the Act of 29 July 2005 on Trading in Financial Instruments and its implementing acts;
 - b) resulting from the Polish Act of 1 March 2018 on Counteracting Money Laundering and Terrorist Financing (the so-called "AML Act"),
 - c) resulting from the Act of 15 September 2000 Commercial Companies Code;
 - d) if applicable, for the purposes of monitoring and recording of telephone conversations and electronic communication with the Bank in accordance with the Act of 29 July 2005 on Trading in Financial Instruments,

- e) purposes related with reporting to authorities, including supervisory authorities, and to other entities, to which the Bank is obliged to report on basis of applicable laws and regulations, including in relation to the Bank's identification and reporting obligations;
 - f) purposes associated with handling actions and complaints related to services provided by the Bank in accordance with the Act on Handling of Complaints by Financial Market Entities and on the Financial Ombudsman of 5 August 2015, as well as handling other requests and inquiries addressed to the Bank.
3. Moreover, in certain situations, it may prove necessary to process your personal data for purposes other than specified above and required in the context of the pursuit of the Bank's legitimate interests (Article 6(1)(f) of RODO), in particular:
- a) for purposes related to the Bank's risk management and internal control,
 - b) if applicable, for purposes related with litigation, as well as pending state authorities' proceedings and other proceedings, including the pursuit of and defense against claims,
 - c) for purposes of counteracting abuses and making advantage of the Bank's activity for criminal purposes, including for purposes of processing, and sharing information concerning suspicions or detecting offences,
 - d) internal reporting within the Bank,
 - e) if applicable, for purposes of keeping internal records of benefits given and received, conflicts of interest and violation of ethics, to the extent necessary to prevent abuse or criminal exploitation of the Bank's activity.
 - f) for purposes related to monitoring and improving the quality of services and products provided by the Bank, including monitoring of telephone conversations and meetings with the Bank, or examination of the level of your satisfaction with the services provided,
4. In other instances, your personal data shall be processed exclusively on the basis of a previously granted consent within the scope and for the purposes specified in such consent.

III. Source of obtaining personal data

If your personal data have not been obtained directly from you, the Bank informs, that they have been obtained from the Bank's Client (the Issuer) or other person having a legal interest in making an entry in the Shareholder Register. If your personal data have not been obtained from the Bank's Client (the Issuer) or other person having a legal interest in making an entry in the Shareholder Register, they have been sourced from public registers (e.g. CEIDG, REGON), or other publicly accessible sources such as the Internet.

IV. Obligation to provide personal data to the Bank

Providing your personal data is a condition for the performance of instructions related to the service of keeping a Shareholder Register and results from compliance with abovementioned legal obligations or is necessary to pursue purposes resulting from legitimate interests of the Bank.

Providing all the required personal data by you enabled the performance of the above-mentioned instruction.

To the extent, where personal data are being collected on the basis of consent, providing personal data is voluntary.

V. Information on recipients of your personal data

In relation to the processing of your personal data for purposes indicated in item II, your personal data may be shared with the following recipients or categories of recipients:

- a) State authorities and entities performing public tasks or acting at the direction of state authorities, to the extent and for purposes resulting from the provisions of law, e.g. the Polish Financial Supervision Authority, the General Inspector for Financial Information,
- b) other entities entitled to receive information in the cases indicated in the law provisions,
- c) entities supporting the Bank in its business processes and brokerage activities, including entities processing personal data for the Bank (the so-called data processors).

VI. Periods of processing of your personal data

Your personal data will be processed for the period necessary for realization of purposes specified in item II, i.e. with respect to the performance of the agreement executed between the Bank and the company (the Issuer) on keeping the Shareholder Register of which you are a Shareholder or you have the status of a person entitled to submit instructions or you are a representative or proxy of the above-mentioned entities for the duration of the agreement on keeping the Shareholder Register and after that, for the period and to the extent required by the provisions of law or for pursuing data controller's legitimate interests by the Bank in the scope stipulated in II above. If you grant your consent to the processing of data for purposes other than those indicated in point II above, your personal data will be processed until the consent is withdrawn.

VII. Profiling and automated decision-making

Profiling should be understood as any form of automated processing of personal data consisting of its use to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's economic situation, reliability, behavior (in particular investment behavior).

To the extent necessary for the performance of instructions or the performance of an agreement for keeping the Shareholder Register, concluded between the Bank and the Issuer or for the Bank's compliance with a legal obligation, your personal data may be processed by automated means, which may be related with automated decision-making, including profiling. The indicated method may have legal effects on you or otherwise significantly affect your situation in connection with the performance of instructions. Such cases shall occur in following situations:

1. Performing money laundering and terrorist financing risk analysis in accordance with the AML Act:
 - a) Your personal data shall be used in „Know you Client” process, which takes place at the stage of establishing relation in connection with the submitted instruction, as well as later, during regular reviews. To the extent of such profiling, i.a. on the basis of information such as: client type, business relations type, types of products, transaction history, geographical risk and verification whether the Shareholder or entitled entity is a politically exposed person (PEP) within the meaning of the AML

Act and whether the client has previously exhibited high-risk activity (e.g. previously reported transactions to GIIF), the level of risk for a given entity is determined or changed. If, as a result of such profiling, you are classified as a high-risk person, the Bank reserves the right to contact you in order to collect additional information. Moreover, as a result of such classification, at the stage of establishing relations there may be a refusal to execute the instruction placed;

- b) Your personal data shall be subject to profiling for purposes of identification of potential cases of money laundering or terrorist financing in accordance with the AML Act. Different factors are considered within such profiling: i.a. data concerning transaction, citizenship, client type, business relations type, geographical area, as well as previous high-risk activity. As a result of such profiling, behavior, which is potentially incompliant with the AML Act in scope of money laundering or terrorist financing, is identified. The consequence of finding reasonable suspicion of money laundering or terrorist financing is to report such a transaction to the appropriate state authorities or a refusal to execute the instruction placed.

VIII. Rights of the data subject

The Bank wishes to assure you that all persons whose personal data are being processed by the Bank hold appropriate rights under RODO. Therefore, you have the following rights:

1. The right to access your personal data, including the right to obtain copies of such data
2. The right to request rectification (correction) of your personal data when such data are inaccurate or incomplete;
3. The right to request the erasure of your personal data (the so-called "right to be forgotten") where i) the data are no longer necessary for the purposes for which they were collected or otherwise processed; (ii) the data subject objects to the processing of personal data; (iii) the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing; (iv) the data are unlawfully processed; (v) the data have to be erased for compliance with a legal obligation;
4. The right to request the restriction of processing of personal data where: (i) the accuracy of the personal data is contested by the data subject; (ii) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; (iii) the controller no longer needs the personal data for the purposes of processing, but it is required by the data subject for the establishment, defense or exercise of legal claims; (iv) the data subject has objected to processing of the personal data - pending the verification whether the legitimate grounds of the controller override those of the data subject;
5. The right to transfer personal data (portability) where (i) the processing is based on agreement with the data subject or on a consent granted by such person or (ii) the processing is carried out by automated means;
6. The right to object to processing of personal data, including profiling, (i) on grounds relating to your particular situation and where (ii) data processing is based on the necessity to pursue purposes resulting from legitimate interests of the Bank, referred to in II above.

IX. The right to withdraw consent for personal data processing

To the extent where you have given consent for processing of your personal data, you are entitled to withdraw such consent for processing of personal data. Withdrawal of consent does not affect the lawfulness of data processing based on consent before its withdrawal.

X. The right to lodge a complaint with a supervisory authority

In case you find processing of your personal data by the Bank is infringing RODO provisions, you are entitled to lodge a complaint with the relevant supervisory authority, i.e. the President of the Personal Data Protection Office or another competent authority responsible for the protection of personal data.

XI. Transfer of personal data to entities outside the European Economic Area (EEA) or international organizations

The Bank in justified and necessary cases may, given the circumstances, share your personal data to entities situated outside the EEA, i.e. The United Kingdom and to international organizations (e.g. SWIFT), as well as to other entities established outside the EEA or international organizations to which such data transfer is necessary for the performance of your instructions. Transfer of data outside the EEA shall take place on the basis of standard data protection clauses concluded with the data recipient. The content of those clauses has been adopted by the European Commission and guarantees the highest standards of personal data protection applied on the market.

You have the right to obtain a copy of the abovementioned standard data protection clauses (or other applicable safeguards for data transfers outside the EEA) via the Bank.