

## PERSONAL DATA PROCESSING NOTICE

### [Information for Clients registered in the records of the Issue Sponsor]

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. ("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. 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. taking steps to conclude with the Issuer an agreement on keeping the register of the Issue sponsor with the Bank or, if necessary, to perform this agreement. The Issuer is a joint-stock company that has issued shares held by you, registered in the register of the Issue sponsor (Article 6(1) (b) of RODO)
2. for the purposes of being compliant with legal obligations borne by the Bank in relation with conducting brokerage activities (Article 6(1) (c) of RODO), including:
  - a) purposes resulting from the Polish Act of 1 March 2018 on Counteracting Money Laundering and Terrorist Financing (the so-called "AML Act"),
  - b) purposes related with reporting to authorities, including supervisory authorities, and to other entities, to which the Bank is obliged to report on the basis of applicable laws and regulations, including in relation to the Bank's identification and reporting obligation
  - c) 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.

### III. Obligation to provide personal data to the Bank

Providing your personal data is a condition for the conclusion and performance of the Bank's agreement with the Issuer 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 made it possible to conclude the above-mentioned contract.

### VI. 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).

## **V. 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. in the scope of execution of the agreement concluded by the Bank with the Issuer, for the period until the end of its execution 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.

## **VI. Profiling and automated decision-making**

Profiling should be understood as any form of automated processing of personal data, so as to evaluate certain characteristics of a natural person, in particular, to analyse or predict her/his economic situation, reliability, behavior (investment behavior in particular).

Your personal data is not subject to automated processing.

## **VII. 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 object to processing of personal data (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

## **VIII. 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.

## **IX. 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.

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

Your personal data will not be transferred to entities situated outside the European Economic Area (EEA) or international organizations.