

Information on processing of shareholders' personal data

Pursuant to the provision of Article 13(1) and (2) of the 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/EC ("GDPR"), KGL S.A. with its registered office in Klaudyn (05-080), Gen. Władysława Sikorskiego 17 street, with REGON number: 017427662, NIP number: 1181624643 and KRS number: 0000092741 ("KGL"), informs you that it processes personal data of shareholders, their representatives or attorneys.

Detailed information on the processing of personal data of shareholders, their representatives or attorneys is provided below.

1. Personal data controller

The controller of personal data of KGL Shareholders who are natural persons and their representatives or attorneys authorized to participate in the General Meeting ("GM") is KGL S.A. with its registered office in Klaudyn (05-080), Gen. Władysława Sikorskiego 17 street, holding REGON number: 017427662, NIP number: 1181624643 and KRS number: 0000092741 (e-mail address: wz@kgl.pl).

2. Information on the Data Protection Officer

KGL S.A., with its registered office Klaudyn, has not appointed a data protection officer within the meaning of Chapter IV, Section 4 of the 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/EC (General Data Protection Regulation).

3. Purposes and grounds for processing personal data

The personal data of the shareholders, their representatives or attorneys will be processed in order to convene, organize and conduct the General Meeting and exercise the shareholders' rights.

The legal basis for the processing of the Shareholders' data is the Commercial Companies Code of September 15, 2000 ("CCC") and the Act on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and Public Companies of 29 July 2005.

Processing of personal data:

- a) is necessary to comply with legal requirements to which the Company is subject (Article 6(1)(c) GDPR);
- b) legitimises the Company's legitimate interest in enabling contact with shareholders, their representatives or attorneys and serves to verify their identity and to assert or defend the Company against potential claims (Article 6(1)(f) of the GDPR).

4. Categories of data processed by KGL

Personal data processed by the Company includes:

- a) shareholders' data included in the list of shareholders entitled to participate in the General Meeting,
- b) data of shareholders, their representatives or attorneys included in the attendance list at the General Meeting,
- c) data of the shareholders' attorneys contained in the power of attorney for representing a shareholder during the General Meeting,
- d) data of shareholders' representatives included in the document from which the relation of representation arises that entitles to represent the shareholder during the General Meeting,
- e) data of shareholders, their representatives or attorneys indicated in the application for access to copies of the list of shareholders,
- f) data of shareholders, their representatives or attorneys convening the General Meeting,
- g) the data of shareholders, their representatives or attorneys indicated in the request containing

the demand to convene the General Meeting and place certain matters on the agenda of the General Meeting,

h) data of shareholders, their representatives or attorneys indicated in the application containing a request to include certain matters in the agenda of the General Meeting,

i) data of shareholders, their representatives or attorneys indicated in the application containing draft resolutions concerning matters introduced into the agenda of the General Meeting or matters which are to be introduced into the agenda of the General Meeting.

The personal data referred to above includes the following categories:

a) data concerning the shareholder participating in the General Meeting (also in the event that a representative or attorney acts on behalf of the shareholder participating in the General Meeting):

(i) name of shareholder,

(ii) the shareholder's address of residence or address for service (if given),

(iii) PESEL number of the shareholder,

(iv) series and number of the shareholder's identity card (or a serial number of another shareholder identification document),

(v) the shareholder's parents' names,

(vi) other data included in the shareholder's identity document,

(vii) number of shares to which the shareholder is entitled,

(viii) the type, numbers and code of the shares to which the shareholder is entitled,

(ix) the number of votes the shareholder is entitled to,

(x) the shareholder's e-mail address or telephone number, if provided;

b) data of the representative or attorney attending the General Meeting on behalf of the shareholder:

(i) PESEL number of the shareholder's representative or attorney,

(ii) series and number of the identity card of the representative or attorney of the shareholder (or a serial number of another identity document of the representative or attorney of the shareholder),

(iii) the names of the parents of the shareholder's representative or attorney,

(iv) other data included in the identity document of the representative or attorney

shareholder,

(v) the e-mail address or telephone number of the shareholder's representative or attorney, if provided.

5. Recipients of data processed by KGL

The personal data of a shareholder, his representative or attorney may be made available by the Company to entities co-operating with it in relation to the performance of the Company's obligations concerning the holding of a General Meeting and - in the case of data included in the list of shareholders entitled to participate in the General Meeting or the attendance list - pursuant to the provisions of the CCC to shareholders who submit a request to view or make available the list of shareholders or the attendance list.

Recipients of the collected personal data are also entities providing hosting services for IT tools used to contact the shareholders and entities providing document archiving services.

6. Period of data retention

Personal data contained in lists of shareholders, attendance lists and powers of attorney and in documents indicating a representation relationship is retained for the duration of the Company's existence and may then be transferred to the entity designated to keep the documents in accordance with the CCC.

Personal data related to the contact via e-mail is stored for a period enabling the fulfilment of obligations under the provisions of the CCC and the period of limitation of potential claims by or against the Company.

7. Rights of the data subject whose personal data is processed

Anyone whose personal data is processed is entitled to:

- a) access to the content of their personal data and receive a copy of it;
- b) rectify (amend) their data;
- c) erase data - if, in the opinion of the person whose personal data is being processed, there are no grounds for KGL to process the personal data, the person may request that KGL erase the data;
- d) restrict processing - the person whose personal data is being processed may request that KGL restrict the processing of that personal data to only storing or undertaking agreed actions;
- e) object at any time to the processing of personal data. Upon receipt of an objection, KGL shall cease to process the data for the purpose or purposes for which the objection has been raised, unless the Company demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject whose personal data is processed or grounds for establishing, investigating or defending against claims;
- f) lodge a complaint to the President of the Office for Personal Data Protection (ul. Stawki 2, 00-193 Warsaw) or other competent authority in case the processing of personal data violates the regulations resulting from GDPR;
- g) withdraw the consent for the processing of personal data. At any time, the person whose personal data is being processed may withdraw their consent to the processing of personal data that KGL processes on the basis of their consent. The withdrawal of consent will not affect the legality of the processing that was carried out on the basis of consent before its withdrawal. Please send the withdrawal of your consent electronically to kbi@kgl.pl or by post to the address of the company's registered office.

8. Information about whether the data is required or voluntary

In the case of transferring data directly to KGL, providing such data is required by the provisions of the CCC in order to enable verification of the identity of a shareholder, its representative or attorney; failure to provide such data may result in the inability to participate in the GM.

As far as the e-mail address is concerned, provision of the said address is voluntary, but necessary to enable contact between KGL and the shareholder, his/her representative or attorney via e-mail; failure to provide it will result in the impossibility of establishing communication via the electronic channel.

9. Information about the source of the data

Shareholders' personal data is obtained from Krajowy Depozyt Papierów Wartościowych S.A. with its registered office in Warsaw, ul. Książęca 4 and is sent by the shareholders, their representatives or attorneys in particular in relation with the need to prove the shareholder status, the possession of an appropriate number of shares (including the fulfilment of duties related to the possession of a certain number of shares in the Company), the right to vote or the right to represent the shareholder.