

Notice on personal data processing by Orzeł Biały Spółka Akcyjna

1. Who is the administrator of your personal data?

The administrator of your personal data (hereinafter "**The Data**") processed by us in connection with conducting business is Orzeł Biały Spółka Akcyjna with its registered office at Piekary Śląskie at ul. Harcerska 23 (41-946), hereinafter referred to as **The Administrator** or **Orzeł Biały**.

Orzeł Biały is a member company of Orzeł Biały Group. The current list of all companies from Orzeł Biały Group is published by Orzeł Biały in periodic reports available at: www.orzel-bialy.com.pl/pl/ir/okresowe. The Data is processed in accordance with the current regulations including with this General Regulation on the Protection of Personal Data (GDPR)¹.

The Data shall mean any information about an identified or identifiable natural person. An identifiable natural person is a person who can be directly or indirectly identified, in particular on the basis of an identifier such as name, identification number, location data, Internet identifier or one or more specific factors determining physical, physiological, genetic, psychological, economic, cultural or social identity of a natural person.

2. How do we process Data?

Orzeł Biały takes special care to protect the interests of the persons to whom the Data applies, and in particular ensures that the collected Data are:

- processed in accordance with the law, fairly and transparently for the Data subject;
- collected for specific, explicit and legitimate purposes and not further processed in a way incompatible with such purposes;
- adequate, relevant and limited to what is necessary for the purposes for which they are processed;
- correct and updated as necessary;
- stored in a form that permits the identification of the Data subject for no longer than is necessary for the purposes for which the Data are processed;
- processed in a manner that ensures adequate Data security including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, by appropriate technical or organisational measures

3. When do we process the Data?

We process the Data in many situations. These may be situations where you have provided your Data in person through various communication channels (e.g. request sent by e-mail or by phone), including in connection with the implementation of functions/obligations resulting from generally applicable laws (e.g. for the needs of shareholder/registration lists)

4. Processing data of shareholders and their proxies

a. What data of shareholders and their representatives are processed?

As the Administrator, being also a public company, we process the Data of the Company's shareholders and their proxies: Identification data, Contact Data and other Data provided to us by shareholders and their proxies in relation to their status and the exercise of their rights and obligations under generally

¹ The General Data Protection Regulation or Regulation of the European Parliament and of the Council 2016/679 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.

applicable laws, including in connection with the participation of shareholders and their proxies at the General Shareholders' Meetings of the Company.

b. What is the purpose and basis of processing Data of shareholders and their proxies?

We process the details of shareholders and their proxies/representatives in order to:

- fulfillment of duties resulting from generally applicable legal regulations, in particular within the framework of responding to inquiries or requests addressed to the Company, conducting further correspondence/contact in this area, keeping registers/lists of shareholders, other necessary documentation;
- defense against potential claims including for the purpose of claim management.

The basis for the processing of Data by the Administrator is the implementation of legal obligations imposed on the Administrator, resulting in particular from the provisions of the Commercial Companies Code, the Public Offering and Conditions for Introducing Financial Instruments to Organised Trading and Public Companies Act, and Regulations of the European Parliament and Council (EU) on market abuse (MAR Regulation).

Providing the Data is voluntary, but necessary to implement the rights of shareholders resulting from generally applicable laws.

c. How long will Data of shareholders and their proxies be processed?

The Data of shareholders and their proxies will be processed for the time necessary to meet obligations resulting from generally applicable laws and then until the expiration of any possible claims.

d. Who is the recipient of Data shareholders and their proxies?

The Data of shareholders and their proxies/representatives may be transferred to our contractors supporting us in the organisation of work, IT services, marketing, correspondence services and providing advisory, consulting, auditing, legal, tax or accounting assistance.

5. Do your Data go beyond the European Economic Area (EEA)?

Your Data does not go beyond the European Economic Area, and if in the future a transfer to a place outside the EEA should be made, Orzeł Biały takes appropriate steps to protect Data, in particular by:

- the use of specific contractual clauses called "standard contractual clauses" that have been approved by the European Commission, or
- transfer to countries for which the European Commission has adopted a decision establishing an adequate level of protection.

In this case, you have the right to obtain a copy of the appropriate security.

6. What rights do you have?

Under the terms of the applicable regulations, you have the right to:

- access the Data including the right to obtain copies thereof;
- requests for Data rectification, deletion or restriction of processing;
- oppose to Data processing;
- transfer your Data to another administrator (to the extent that the basis for Data processing is indispensability to perform the contract or your consent).

If the processing of the Data takes place on the basis of your consent, you have the right to revoke it at

any time without affecting the legality of the processing which was made on the basis of your consent before its withdrawal.

You are also entitled at all times to file a complaint to the President of the Office for the Protection of Personal Data.

7. Contact:

You may contact Orzeł Biały Spółka Akcyjna under e-mail: ir@orzel-bialy.com.pl or phone: (32) 779 65 45.