



Pursuant to Article 14 sections 1–2 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 (General Data Protection Regulation) (hereinafter referred to as “**GDPR**”), we hereby inform you that:

- I. The Controller of your personal data (“ADO”)** is Zespól Elektrociepłowni Wrocławskich KOGENERACJA S.A. with its registered office in Wrocław at ul. Łowiecka 24, 50-220 Wrocław.
- II.** You can contact the **Data Protection Officer appointed at Zespól Elektrociepłowni Wrocławskich KOGENERACJA S.A.** in matters of personal data protection at the e-mail address: [odo@kogeneracja.com.pl](mailto:odo@kogeneracja.com.pl) or at the registered office address indicated in item I above.
- III. Categories of personal data.** Personal data processing activities involve in particular the following categories of data: first and last name, address, name of the shareholder’s company and place of registered office in the case of self-employed natural persons, number of shares/votes held, PESEL [personal identification number], KRS [National Court Register number].
- IV. Source of data.** We received your personal data from Krajowy Depozyt Papierów Wartościowych [National Securities Depository] in connection with your expression of your intention to participate in the General Meeting of Shareholders and to exercise your voting rights, pursuant to Article 406<sup>3</sup> § 1, 2, 3 and 5 of the Polish Code of Commercial Partnerships and Companies.
- V. Purposes and basis of processing.** Your personal data will be processed to the extent related to your participation in the General Meeting of Zespól Elektrociepłowni Wrocławskich KOGENERACJA S.A.

#### **Specific purposes and grounds for processing**

Zespól Elektrociepłowni Wrocławskich KOGENERACJA S.A. will process your personal data as follows:

1. In order to enable you to exercise your right to the profits of a shareholder.  
The processing is necessary for the fulfilment of the Controller’s legal obligations in connection with Article 347 of the Polish Code of Commercial Partnerships and Companies (Article 6(1)(c) of the GDPR).
2. To enable you to participate in the General Meeting.  
The processing is required for the fulfilment of the Controller’s legal obligations in connection with Article 406<sup>3</sup> § 1, 1, 2, 4 and 5 of the Polish Code of Commercial Partnerships and Companies (Article 6(1)(c) of the GDPR).
3. In order to properly perform the tasks related to the service of individuals holding shares in the company (including, in particular, the tasks related to the maintenance of the list of shareholders entitled to participate in the General Meeting).  
The processing is necessary for the fulfilment of the Controller’s legal obligations in connection with Article 407 § 1, 1<sup>1</sup> and 2 of the Polish Code of Commercial Partnerships and Companies (Article 6(1)(c) of the GDPR).
4. In order to comply with the information obligation on public offerings and conditions for the introduction of financial instruments to the organised trading system and on public companies.  
The processing is necessary for the fulfilment of the Controller’s legal obligations in connection with the provisions of the Act of 29 July 2005 on public offerings and conditions for the introduction of financial instruments to an organised trading system and public companies (Article 6(1)(c) of the GDPR).
5. In order to comply with the information obligations imposed on the issuer of shares with regard to current and periodic reporting.  
The processing is required in order to fulfil the Controller’s legal obligations in connection with the Regulation of the Minister of Finance of 29 March 2018 on current and interim information communicated by issuers of securities and on the conditions for regarding as equivalent the information required by the provisions of the law in force in a non-Member State (Article 6(1)(c) of the GDPR).
6. For the purpose of making an audio-visual recording of the General Meeting allowing the processing of the image of a participant of the General Meeting being the implementation of the Controller’s legitimate interest related to the implementation of the Best Practices of Companies Listed on WSE and, in addition, broadcasting the meeting via the Controller’s website (Article 6(1)(f) of the GDPR).



7. In order to keep records related to the implementation of rules, policies, procedures, regulations, instructions in force in the company being the implementation of the Controller's legitimate interest related to the management of the company (Article 6(1)(f) of the GDPR).
  8. For archival (evidential) purposes, being the fulfilment of the legitimate interest of Zespół Elektrociepłowni Wrocławskich KOGENERACJA S.A. in the form of securing information in the event of a legal need to prove facts – including providing access to the recordings of the General Meeting (Article 6(1)(f) of the GDPR).
  9. For the purpose of potential identification, investigation or defence against claims being the implementation of the legitimate interest of Zespół Elektrociepłowni Wrocławskich KOGENERACJA S.A. (Article 6(1)(f) of the GDPR).
- VI. The duration of the processing** of your personal data is relative to the purpose of the processing indicated above. In view of the above, the personal data will be processed for the period in which the Controller is obliged by law to store the data or for the period of the statute of limitations for possible claims, for the assertion of which it is necessary to keep the data.
- VII. Rights of data subjects.** In the cases and under the terms of generally applicable data protection legislation, you have the right to:
- a. access your personal data,
  - b. receive a copy of your data,
  - c. rectify (amend) your data,
  - d. erase your data,
  - e. restrict the data processing,
  - f. object to the processing of your data,
  - g. transfer your data,
  - h. lodge a complaint with the relevant supervisory authority – the Personal Data Protection Office.
- VIII. Data recipients.** Your personal data will be transferred to:
- a. entities from the PGE Group with whom the Controller cooperates by combining products or services (e.g., PGE Systemy S.A. performing services in the ICT area),
  - b. entities authorised to receive data of shareholders and persons participating in the General Meeting pursuant to the provisions of the law – Financial Supervision Authority; Stock Exchange; other shareholders,
  - c. entities cooperating with the company in the field of consultancy, advisory, accounting, legal and auditing services,
  - d. our subcontractors and service providers (processors) with regard to the services performed (archiving, organisation of the General Meeting).
- IX. Processing of data outside the EEA.** Your personal data will generally not be transferred outside the European Economic Area (hereinafter: EEA). However, given the services provided by the Controller's subcontractors in the provision of support for ICT services and IT infrastructure, the Controller may outsource certain activities or IT tasks to recognised subcontractors operating outside the EEA, which may result in the transfer of your data outside the EEA. The individual countries outside the EEA in the territory of which your personal data will be processed shall, in accordance with the European Commission's decision, ensure an adequate level of protection of personal data in accordance with EEA standards. However, in the case of their processing in the territory of States for which the European Commission has not established an adequate level of protection of personal data (compatible with EEA standards), in order to ensure an adequate level of such protection, the Controller shall enter into agreements with the recipients of your personal data. The agreements referred to above are based on the standard contractual clauses issued by the European Commission in accordance with Article 46(2)(c) of the GDPR. A copy of the standard contractual clauses referred to above can be obtained from the Data Protection Officer.
- The method used by Zespół Elektrociepłowni Wrocławskich KOGENERACJA S.A. to secure your data is in accordance with the principles provided for in Chapter V of the GDPR. You may therefore request further information on the safeguards in place in this regard, obtain a copy of these safeguards and information on where they are available.
- X. Automated decision-making.** Please be informed that no automated decisions will be taken in the processing of the data referred to above and your data will not be profiled.