

## **INFORMATION CLAUSE FOR SHAREHOLDERS OF TALEX S.A. WHO ARE NATURAL PERSONS AND PROXIES OF SHAREHOLDERS OF TALEX S.A. GROUP**

date of revision: 2024-06-30

You are also provided this information in the abridged or full version of the information obligation given to you in the direct communication at first contact.

### **CONTROLLER OF PERSONAL DATA**

The controller (administrator) of your personal data is TALEX S.A. with its registered office at ul. Karpia 27d, 61-619 Poznań, NIP: 782-00-21-045, REGON 004772751; hereinafter: the Administrator.

### **CONTACT US REGARDING PERSONAL DATA**

Would you like to notify us of a data breach, send us a request concerning your rights as a data subject? Do you have questions or doubts concerning the protection of personal data?

Contact information of the Data Protection Officer of TALEX:

E-mail: [iod@talex.pl](mailto:iod@talex.pl)

Address: TALEX S.A. ul. Karpia 27d, 61-619 Poznań, with reference "IOD".

### **PURPOSE AND LEGAL BASIS FOR DATA PROCESSING**

Shareholders or shareholder's proxies shall be understood as natural persons entitled to participate in the General Meeting, who have demonstrated their status as shareholders or shareholder's proxies, who have requested access to the list of shareholders entitled to participate in the General Meeting of Talex S.A. or the list of shareholders present at the General Meeting, who have requested access to copies of motions on matters on the agenda of the General Meeting, who have requested that the General Meeting be convened, who have requested that matters be placed on the agenda of the convened General Meeting or who have submitted a draft resolution of the General Meeting.

Your personal data is processed for the purposes:

1. related to the proper performance of the tasks arising from the service of the entities holding shares in Talex S.A., including for the purpose of holding the General Meeting of Talex S.A. and enabling participation therein, compiling and making available, upon request, the list of shareholders and the possible exercise of the right to profit participation, as well as the implementation of the legal requirements incumbent on Talex S.A. as a public company.

The legal basis for processing your personal data for the purposes indicated above is:

- fulfilment of legal obligations incumbent on Talex S.A. pursuant to Article 6(1)(c) of GDPR related to, inter alia: Article 341 (share ledger), Article 347 (profit distribution), Article 407 (list of shareholders), Article 429 (request for information) of the Code of Commercial Companies, Art. 70(3) (information obligations of a public company) of the Act on Public Offering and the Conditions for Introducing Financial Instruments to the Organized Trading System and on Public Companies, Chapter 2 (current report of the issuer) of the Regulation of the Minister of Finance on current and periodic information provided by issuers of securities and conditions for recognizing as equivalent information required by the laws of a non-member state, Art. 19(3) (issuer's information obligation) of the Regulation (EU) No 596/2014 of the European Parliament and of the Council on market abuse (Market Abuse Regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC;

- legitimate interest of TALEX S.A. under Article 6(1)(f) of GDPR related to enabling contact with shareholders, verifying their identity and exercising the rights and obligations of shareholders and their proxies,

2. related to ensuring the safety of employees, protection of property and maintaining the secrecy of information, the disclosure of which could expose the Administrator to damage within the framework of: application of a video monitoring system, enabling image registration, application of an electronic access control system, including the preparation and issue of an individual name badge with a photograph.

The legal basis for the processing of your personal data for the purposes indicated above is the legitimate interest of Talex S.A. in accordance with Article 6(1)(f) of GDPR related to the

recording of personal traffic on Talex S.A. premises and verification of identity (Article 6(1)(f) of GDPR),

3. the establishment, investigation or defense against claims.

The legal basis for the processing of your personal data for the purposes indicated above is the legitimate interest of Talex S.A. in accordance with Article 6(1)(f) of GDPR consisting of assessing the risk of claims being brought against us and defending against them (Article 6 (1)(f) of GDPR).

## **DATA SOURCES**

Your personal data as a shareholder or shareholder proxy has been obtained from the National Securities Depository S.A., Warsaw, or directly from you.

## **DATA COLLECTION RULES**

The scope of personal data processed includes ordinary data in the form of name and address.

## **PERIOD OF DATA PROCESSING**

Your personal data:

1. contained in the share ledger will be processed for the duration of activities of TALEX S.A.;
2. contained in the lists of shareholders and enabling the possible exercise of the right to profit-sharing, contained in the attendance lists, documents certifying the right to representation, including powers of attorney, enabling contact to be made by e-mail will be kept for a period of 1 year from the date of the general meeting;
3. processed in connection with a challenge to a resolution of the general meeting will be retained until the legal proceedings in this regard have become final;
4. used for the purpose of dealing with an enquiry or complaint (with the exception of data necessary to prove legal succession in the stock ledger) will be processed for the duration of the investigation and, after completion of the investigation, for a maximum period of 3 years, until the statute of limitations for potential claims;
5. processed for a purpose other than those mentioned above will be processed for the period there is an obligation to store them by Talex S.A. in connection with the fulfilment of the purposes set out in point IV above, and thereafter for the period and to the extent required by applicable law. If you have given your consent to the processing of your personal data for the purpose of participating in future recruitments, we will process your data for this purpose until you revoke your consent, but no longer than 12 months from the date of your application and your consent.
6. processed for purposes related to employee safety, property protection and information secrecy – 3 months from the date of recording
7. processed for the purpose of redress and protection against claims – 6 years from the date on which the legal relationship is terminated or expired

## **DATA RECIPIENTS**

Recipients of your personal data may be other shareholders in connection with their right to inspect the list of shareholders, in connection with the display of the list of shareholders at the Board's premises, and the right to receive a copy of that list. In addition, your personal data may also be published in current reports and communicated to the Financial Supervisory Commission when you hold at least 5% of the votes at the General Meeting of Shareholders. Personal data may also be transferred to the following categories of recipients:

1. entities processing personal data on behalf of Talex S.A., including but not limited to those operating the IT systems used for the purposes indicated above,
2. entities providing services to the Talex S.A. Group, including courier and postal companies, legal and financial advisers and auditors,

whereby such entities process data on the basis of a contract with Talex S.A. and only in accordance with its instructions. Data may also be made available to entities authorized by law.

Your personal data may be transferred outside the European Economic Area within the framework of the Administrator's use of IT solutions and systems provided by other entities, which may store personal data on servers located outside this area (including the United States) or within the framework of the Administrator's provision of business-related services - to the extent necessary for their

performance, the basis for such transfer may be a decision of the European Commission stating an adequate level of protection or the application of appropriate legal safeguards, which are in particular standard contractual clauses for the protection of personal data approved by the European Commission.

### **GRANTED RIGHTS**

In relation to the processing of your personal data by the controller, you have the right to:

1. access your personal data,
2. rectify your personal data,
3. erase your personal data,
4. restrict the processing of your personal data,
5. object to the processing of your personal data,
6. withdraw consent.

You have the right to lodge a complaint to the supervisory authority, i.e. the President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw.

### **ADDITIONAL INFORMATION**

The provision of personal data is a statutory requirement, necessary to fulfil the purposes indicated in this notice.

There is no automated decision-making, including profiling, in the processing of personal data.