

## **Details regarding the processing of personal data by KGHM**

### **1. Administrator of personal data**

The administrator of your personal data will be KGHM Polska Miedź S.A. with its registered head office in Lubin (hereafter: „we”). You can contact us in the following manner:

- a) by post at the address: ul. M. Skłodowskiej-Curie 48, 59-301 Lubin,
- b) by e-mail: iod@kghm.com.

Please add the notation: Shareholder

### **2. Data Protection Officer**

We have designated a Data Protection Officer. You may contact this person in any matter related to the processing of personal data as well as to availing yourself of the rights related to the processing of your data. You may contact the Data Protection Officer in the following manner:

- a) by post at the address: ul. M. Skłodowskiej-Curie 48, 59-301 Lubin,
- b) by e-mail: iod@kghm.com.

### **3. Reasons for processing your personal data and legal basis for processing**

We shall process your personal data in order to comply with obligations related to shareholders arising from:

- a) the purchase and possession of shares of the Administrator,
- b) obligations set forth in the Commercial Partnerships and Companies Code (dated 20 July 2017 (Journal of Laws from 2017 item 1577), in particular art. 341, art. 347, art. 407 and art. 429.
- c) obligations set forth in the act on public offerings and conditions governing the introduction of financial instruments to organised trading, and on public companies (dated 7 February 2018 (Journal of Laws from 2018 item 512), in particular art. 70.
- d) obligations set forth in the act on trading in financial instruments (dated 15 September 2017 (Journal of Laws from 2017 item 1768),
- e) obligations set forth in Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (market abuse regulation) as well as 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.

The provision of these data is a legal requirement, while their collection is regulated by the aforementioned laws and regulations. Failure to provide the aforementioned personal data may result in forfeiture of the status of shareholder and of execution of the rights and

obligations to which a shareholder is entitled.

Your personal data related to the aforementioned obligations shall be processed, among others, for the following purposes:

- a) related to the proper execution of tasks arising from the servicing of entities holding shares, including for the purpose of conducting the General Meeting,
- b) the preparation and disclosure on demand of the list of shareholders, and of any execution of the right to participate in profit sharing,
- c) to enable contact with shareholders, verification of identity and any potential determination, investigation or defense against claims, where the legal basis shall be art. 6 sec. 1 letter f) of the GDPR (legally justified interest is related to the legal relationship(s) between us).

Please be informed that we have acquired your data, in terms of first name, surname, number of shares/votes, contact address, and pesel identification number, from the Polish Central Securities Depository (KDPW).

#### **4. Information regarding profiling**

We do not profile your data.

#### **5. Automated decision-making**

We do not engage in automated decision-making.

#### **6. Period of storage of your personal data**

To a certain extent, insofar as this shall arise from laws in force, we shall store your personal data for the period in which you hold the status of shareholder and for archival purposes until such time as the Administrator ceases its activities or the expiry of claims.

In the case of processing personal data based on legally justified interests, your personal data will be stored for a period necessary to carry out this interest or until such time as there is an effective objection to the processing of the data.

#### **7. Recipients of your personal data**

We shall disclose your personal data to the following recipients:

- a) employees of the Administrator or members of the statutory bodies of the Administrator,
- b) other shareholders,
- c) administrative authorities and courts of the Republic of Poland as regards obligations of the Administrator with respect to registration or information,
- d) entities which provide us with services which require access to the data – including: legal, financial, accounting and IT services.

#### **8. Disclosure of data beyond the European Economic Area**

Your data may be sent beyond the European Economic Area. Due to the utilisation by us or by our contractors – e.g. suppliers of legal, tax or auditing services – of modern technology, such as e.g. cloud services, your personal data may be provided to countries outside the European Economic Area, in cases where the said countries, based on decisions by the European Commission, have been acknowledged as assuring an adequate level of personal data protection to the degree of protection prevailing within the European Economic Area, or under condition of the application of appropriate assurances which may entail the use of binding corporate rules, standard data protection clauses adopted by the European Commission, standard data protection clauses adopted by the President of the Data Protection Office or contractual clauses permitted by the President of the Data Protection Office. You have the right to receive copies of the said assurances respecting the disclosure of personal data – to obtain these, please contact us or our Data Protection Officer.

## **9. Your rights related to the processing of personal data**

You have the following rights related to the processing of personal data:

- a) the right to access your personal data,
- b) the right to demand rectification of your personal data,
- c) the right to demand erasure of your personal data,
- d) the right to demand restrictions on the processing of your personal data.

**To avail yourself of these rights**, please contact us or our Data Protection Officer (using the contact data provided in points 1 and 2 above)

### **The right to object**

Within the scope in which your data are processed based on our legally justified interests, you have the right to object to the processing of the data due to your specific situation.

You may announce your objection to the processing of these data at any time using the e-mail address indicated in point 1.

### **The right to lodge a complaint with a supervisory authority**

You also have the right to lodge a complaint with the supervisory authority involved in the protection of personal data, i.e. with the President of the Data Protection Office.