

<b>Basic information regarding the processing of personal data</b>	
Data Controller	KGHM Polska Miedź S.A.
Reasons for processing data	personal data is processed for the purpose of complying with obligations related to shareholders who purchase and possess the shares of the Data Controller as well as to comply with laws in force
Recipients of data	data may be disclosed to entities entitled by law as well as to entities and their employees who provide services to us requiring access to data – including: legal, financial, accounting and IT services.
Rights related to the processing of data	<ul style="list-style-type: none"> <li>a. the right to access your personal data,</li> <li>b. the right to demand rectification of your personal data,</li> <li>c. the right to demand erasure of your personal data, and</li> <li>d. the right to demand restrictions on the processing of your personal data.</li> </ul>

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

### **1. Controller of personal data.**

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

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

### **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:

- by post at the address: ul. M. Skłodowskiej-Curie 48, 59-301 Lubin
- 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 Data Controller;
- b. the Commercial Partnerships and Companies Code (dated 20 July 2017 (Journal of Laws from 2017 item 1577)),
- c. 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)),
- d. the act on trading in financial instruments (dated 15 September 2017 (Journal of Laws from 2017 item 1768)),
- e. 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.

### **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.**

We shall store your personal data for the period in which you hold the status of shareholder, and the data shall be stored for archival purposes until such time as the Data Controller concludes its activities.

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

We shall disclose your personal data to the following recipients:

- employees of the Data Controller,

- administrative authorities and courts of the Republic of Poland, to the extent of being within the scope of the registration or informational obligations of the Data Controller, and
- 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 based on art. 407 paragraph 1 (1) of the Commercial Partnerships and Companies Code, which states that our shareholder may demand that shareholder lists be sent to him/her at the shareholder's residence or registered head office, which may also be located beyond the European Economic Area.

In a case wherein there is not a decision which confirms an adequate level of protection of personal data in the aforementioned residence country or registered head office of the shareholder as specified in art. 45 section 3 of the General Data Protection Regulation (GDPR) or there is a lack of adequate protection as specified in art. 46 of the GDPR, personal data may be transferred to a third country in accordance with the basis specified in art. 49 section 1 letter e of the GDPR, i.e. such transfer is necessary for the establishment, exercise or defence of legal claims.

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

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

- a. the right to human intervention from KGHM regarding decisions,
- b. the right to access your personal data,
- c. the right to demand rectification of your personal data,
- d. the right to demand erasure of your personal data, and
- e. 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 also, at any time, express your objection to the processing of the data for marketing purposes by using the e-mail address cited in point 1.

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

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

### **10. Requirement to provide data.**

The provision of data is required to enter into and execute contracts/agreements – if data is not provided then a contract/agreement will not be entered into; the requirement to collect personal data arises from the following:

- a. 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),
- b. the act on trading in financial instruments (dated 15 September 2017 (Journal of Laws from 2017 item 1768),
- c. 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.