

Information on the Processing of Personal Data in Business Relations

Information obligation under Art 13 and Art. 14(1) and (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).

1. What does this information pertain to?

This information describes how Polenergia S.A. and the companies for which Polenergia S.A. is the parent company or which are its affiliated companies ("Polenergia", "we" or "us") process personal data:

- a) members of the personnel of Polenergia's counterparties (i.e., our investors, clients, suppliers, and other partners, collectively "Counterparty"). These include employees, associates, representatives, managers, beneficial owners, members of corporate bodies and any other persons representing the Counterparties,
- b) Counterparties themselves, provided they operate their business in the form of a sole proprietorship or a civil law partnership.
- c) owners or co-owners of real property, as well as their representatives (collectively „You“)

We process your personal data ("Personal Data") for the purpose of entering into a contract with the Counterparty or with you, and for performance and settlement of such contract.

This information also describes your rights with respect to the protection of Personal Data, including the right to object to certain types of processing of Personal Data by Polenergia. Further information regarding your rights and the means of exercising them is provided below in Section 10, "Your rights".

2. Personal Data Controllers and their Contact Details

Depending on the party with whom you enter into a contract or commence cooperation, the controller of Personal Data may be one or more of the following Polenergia companies:

Controller	Registered office	Contact information
Polenergia S.A.	ul. Krucza 24/26, 00-526 Warsaw	rodo@polenergia.pl
Polenergia Dystrybucja sp. z o.o.	ul. Krucza 24/26, 00-526 Warsaw	rodo@polenergia.pl
Polenergia Obrót S.A.	ul. Krucza 24/26, 00-526 Warsaw	rodo@polenergia.pl

Polenergia eMobility sp. z o.o.	ul. Krucza 24/26, 00-526 Warsaw	rodo@polenergia.pl
„Dipol” sp. z o.o.	ul. Krucza 24/26, 00-526 Warsaw	rodo@polenergia.pl

3. Data Protection Officer and their contact details

The following Polenergia companies have appointed a Data Protection Officer (DPO) who may be contacted in all matters relating to the processing of Personal Data at the contact details specified below:

Controller	DPO contact information
Polenergia S.A.	rodo@polenergia.pl
Polenergia Dystrybucja sp. z o.o.	rodo@polenergia.pl
Polenergia Obrót S.A.	rodo@polenergia.pl
Polenergia eMobility sp. z o.o.	rodo@polenergia.pl
„Dipol” sp. z o.o.	rodo@polenergia.pl

4. Categories of personal data

Polenergia processes the following categories of Personal Data:

- identification data (e.g., first name and surname, position or role, company, Tax Identification Number NIP),
- KYC/AML data (identification data, parents' first names, Personal Identification Number PESEL, identity card data (including dates of issue and expiry), addresses, tax residency, PEP status and FATCA/CRS statuses),
- business contact details (e.g., telephone number, email address, postal address, name of the Counterparty),
- data relating to your relationship with us, including our correspondence with you,
- information on the performance and settlement of the contract.

5. Purposes and legal basis for processing

Polenergia processes Personal Data for the purpose of:

- the execution and performance of a contract, including settlement thereof, pursuant to Article 6(1)(b) GDPR,
- the performance of legal obligations pursuant to Article 6(1)(c) GDPR, in particular tax, accounting and personal data protection obligations, the prevention of abuses on the capital market, as well as reporting obligations towards regulatory authorities, the obligations of obliged entities and the application of financial security measures (the Act on Counteracting Money Laundering and Terrorist Financing),

as well as on the basis of our legitimate interest in conducting and developing our business activities (pursuant to Article 6(1)(f) GDPR) for the purpose of:

- c. Managing our relations with you,
- d. communication regarding matters related to the performance of the contract and cooperation,
- e. retention of evidence of the performance of duties and obligations and the assurance of compliance with internal policies and procedures,
- f. pursuit of or defense against potential claims,
- g. conducting market research, developing and promoting new products and services and enhancing or modifying our existing services,
- h. performing analyses, compiling statistics, and preparing summaries for internal use, reporting, and planning,
- i. ensuring security in our operations, including physical security, IT assets, personal data, or cybersecurity,
- j. ensuring compliance with our internal regulations (including procedures and policies), including oversight of adherence thereto,
- k. controlling and audit,
- l. direct marketing,
- the foregoing actions may include profiling;

6. Categories of recipients of Personal Data

The recipients of your personal data may include the following entities:

1. Entities authorized under the provisions of law (e.g., state authorities, regulatory authorities, courts).
2. Entities providing services to Polenergia as subcontractors (e.g., providers of IT infrastructure) or as independent controllers (e.g., internal auditors, advisers, including legal advisers, banks, insurers, and postal and courier service operators) do so on the basis of separate contracts that ensure the appropriate processing of your Personal Data.
3. In the event of a sale of, or a merger involving, Polenergia with another company, your Personal Data will be disclosed to our advisors, to the advisors of the potential investor/buyer/seller, and to the investor or the new owners of the company.
4. companies within the Polenergia Group for the internal administrative purposes of our group.

7. Personal Data source

We have received your Personal Data from you, from a Counterparty or another member of the Counterparty's personnel, or from publicly available sources (KRS, CEIDG, CRBR, etc.).

8. Transfer of Personal Data outside the EEA

When Personal Data is transferred to third countries, i.e., to recipients established outside the European Economic Area or Switzerland — which is necessitated by the locations of the data-processing centers of the companies with which we cooperate — we will transfer Personal Data using mechanisms that comply with applicable law, which include, among others, the conclusion of standard contractual clauses with the recipient approved by the European Commission. You have the right to obtain information about the third countries to which your Personal Data is transferred and to obtain copies of the appropriate safeguards for the transfer of Personal Data. For this purpose, please contact us using the details specified in point 2 above.

9. Retention period for Personal Data

Polenergia retains Personal Data only for the period necessary to achieve the purposes for which the data is processed.

Personal Data will be retained for the duration of the performance of the contract, and thereafter for the limitation period for claims or until the end of the limitation period for Polenergia's tax liabilities, or for as long as required by law (e.g., for five years in the context of applying financial security measures). In the case of direct marketing, data is retained until an objection is lodged.

10. Your rights

We ensure the exercise of your rights in accordance with the provisions of the GDPR.

Access to your Personal Data: At any time, you have the right to request access to information regarding the processing of your Personal Data by Polenergia and to obtain a copy of your Personal Data.

Correction of your Personal Data: You may request that we update the Personal Data held by us.

Deletion of your Personal Data: You are entitled to request the deletion of Personal Data processed by Polenergia in the circumstances referred to in Article 17 GDPR.

Objection to the processing: You have the right to object to our processing of your Personal Data on the basis of a legitimate interest, or to processing for the purposes of direct marketing, including profiling.

Transferring your Personal Data: You have the right to receive the data that you provided to us (for the purpose of entering into a contract) in a structured, commonly used, machine-readable format, or to request that they be transmitted to another entity, provided that it is technically feasible.

Limitation of your Personal Data processing: Polenergia exercises the right to limit processing in the situations specified in Article 18 GDPR.

In order to exercise your rights, submit requests and ask questions regarding the processing of your Personal Data, please contact us using the contact details referred to in point 2 above.

The right to lodge a complaint with a supervisory authority: You have the right to file a complaint to the President of the Personal Data Protection Office, if you believe your data processing is in breach of the provisions of GDPR.

11. Information on whether the provision of Personal Data is mandatory or voluntary.

Providing us with your personal data is voluntary; however, failure to provide it may make it impossible to enter into a contract or may impede its performance.

12. Decisions made by automated means

We do not perform automated decision-making, including any decisions based on profiling.

13. Updates to this information

We reserve the right to update this information at any time, and in the event of significant changes, we will provide you with a new version of this information. From time to time, we may also notify you about the processing of your Personal Data by other information channels.