# INFORMATION ON THE PROCESSING OF PERSONAL DATA OF SHAREHOLDERS AND PROXIES OF SHAREHOLDERS FOR THE GENERAL MEETING OF URTESTE S.A. ON 6 DECEMBER 2024

On the basis of the Regulation of the European Parliament and of the Council (EU), 2016/679 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 the GDPR, the Issuer's Management Board informs:

#### 1. Personal data controller

The controller of the personal data of shareholders and proxies is URTESTE S.A. with its registered office in Gdańsk (the 'Company') entered into the Register of Entrepreneurs kept by the District Court Gdańsk-Północ in Gdańsk, 7th Commercial Division of the National Court Register, KRS 0000886944, NIP [Taxpayer ID No.] 5833355988, with the share capital amounting to PLN 140,966.90 (fully paid up).

In all matters related to data protection, please contact us via e-mail address: urteste@urteste.eu.

# 2. Categories of personal data

- a) Identification data
- b) Address data
- c) Contact data

#### 3. Basis for and purpose of processing personal data

The personal data of shareholders and proxies will be processed on the basis of Article 6(1)(c) of the GDPR in order to organise the General Meeting and to enable authorised persons to exercise their voting rights at the Meeting.

Personal data will also be processed on the basis of Article 6(1)(f) of the GDPR in order to establish, assert or defend claims in relation to the General Meeting, which is a legitimate interest pursued by the Controller or third parties.

#### 4. Sharing of personal data

Personal data of shareholders and proxies may be shared by the Company with other shareholders pursuant to Articles 407 § 1 and 1¹ of the Commercial Companies Code.

Personal data may also be made available to entities and authorities to which the Controller is obliged or authorised to make it available on the basis of generally applicable laws (in particular, authorised employees of the Controller, legal advisors serving the General Meeting, including a notary public and other persons acting under the authority of the Controller).

#### 5. Period of retention of personal data

The personal data of shareholders and proxies will be retained for no longer than necessary, i.e. for the period necessary for the Company to hold the Extraordinary General Meeting, and thereafter for the period required by law or for the fulfilment of any claims that the Company may raise and that may be raised against the are recorded.

### 6. Rights of shareholders and proxies

In relation to the processing of personal data by the Company, shareholders and proxies have the following rights:

- a) The right of access to personal data (Article 15 of the GDPR)
- b) The right to rectify personal data that is inaccurate and to complete incomplete personal data (Article 16 of the GDPR)
- c) The right to request the erasure of personal data (right to be forgotten) (Article 17 of the GDPR), however this right does not apply to the extent that the processing is necessary in the cases indicated in Article 17(3) of the GDPR and in this case where the processing is necessary for the performance of a legal obligation (pursuant to Article 17(3)(b) of the GDPR)
- d) The right to restrict the processing of personal data in the situations indicated in Article 18 of the GDPR
- e) The right to object to processing where the Company processes personal data on the basis of its legitimate interest (Article 21 of the GDPR), an objection can be expressed on the grounds of a particular situation to the Data Protection Officer, who can be contacted as indicated in point 1
- f) The right to lodge a complaint with the supervisory authority in charge of personal data protection, i.e. the President of the Office for Personal Data Protection

# 7. Source of acquisition of personal data

Personal data may come from:

- a) In the case of a Shareholder of the Company, from the system of Krajowy Depozyt Papierów Wartościowych S.A. (National Securities Depository) or directly from the Shareholder, as well as from the records covered by the share book kept by the Management Board of the Company pursuant to Article 341 par. 1 of the Commercial Companies Code (with regard to registered shares and temporary certificates and the rights of pledgees and users)
- b) In the case of a proxy of a shareholder of the Company, from the principal in the case of a power of attorney granted.

## 8. Requirement to provide data

The provision of personal data by the shareholder or proxy is necessary for the purpose set out in point 3, i.e. verification of entitlement to participate in the General Meeting and for drawing

up and forwarding to other shareholders, the list of persons entitled to participate in the General Meeting.

In the case of an e-mail address, the provision of such an address is voluntary but necessary to enable contact between the Company and the Shareholder by e-mail, and failure to provide such an address will mean that no contact can be made by this means.

# 9. Automated decision-making including profiling

Personal data of shareholders and proxies will not be processed by automated means including profiling.

# 10. Transfers of data to third countries

Personal data will not be transferred to third countries.