

**INFORMATION ON PROCESSING OF PERSONAL DATA OF SHAREHOLDERS AND  
PROXIES OF SHAREHOLDERS  
FOR THE GENERAL MEETING OF URTESTE S.A. ON JUNE 25, 2025**

Pursuant to the Regulation of the European Parliament and of the Council (EU), 2016/679 of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free flow of such data and repealing Directive 95/46/EC (General Data Protection Regulation), hereinafter referred to as RODO, the Issuer's Management Board informs:

**1. Personal data administrator**

The administrator of personal data of shareholders and proxies is URTESTE S.A. with its registered office in Gdańsk (the "Company") entered in the Register of Entrepreneurs kept by the District Court Gdańsk-North in Gdańsk, VII Economic Department of the National Court Register, KRS 0000886944, NIP 5833355988, amount of share capital PLN 140,966.90 (fully paid up).

In all matters related to data protection, please contact via e-mail address: [urteste@urteste.eu](mailto:urteste@urteste.eu).

**2. Categories of personal data**

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

**3. Basis for processing 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 RODO in order to organize the General Meeting and enable authorized persons to exercise their voting rights at the Meeting.

Personal data will also be processed on the basis of Article 6(1)(f) RODO in order to establish, assert or defend claims in connection with the General Assembly, which is a legitimate interest pursued by the Administrator 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 Article 407 par. 1 and 1<sup>(1)</sup> of the Commercial Companies Code.

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

## **5. Period of storage 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 Annual General Meeting, and thereafter for the period required by law or for the realization of any claims that the Company may raise and that may be raised against the Company.

## **6. Rights of shareholders and proxies**

In connection with processing by the Company of personal data, shareholders and proxies are entitled to:

- a) The right to access personal data (Article 15 RODO)
- b) The right to rectify personal data that is inaccurate and to complete incomplete personal data (Article 16 RODO)
- c) The right to request erasure of personal data (the right to be forgotten) (Article 17 RODO), however, this right does not apply (does not apply) to the extent that the processing is necessary in the cases indicated in Article 17. Paragraph 3 RODO and in this case, when the processing is necessary for the fulfillment of a legal obligation (according to Article 17. Paragraph 3 lit. b RODO)
- d) The right to restrict the processing of personal data in situations indicated in Article 18 RODO
- e) The right to object to processing - in cases where the Company processes personal data on the basis of its legitimate interest (Article 21 RODO), the 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 the National Securities Depository S.A. or directly from the shareholder, as well as from the records covered by the stock ledger maintained by the Company's Board of Directors pursuant to Article 341 par. 1 of the Commercial Companies Code (with respect 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. Data requirement**

The provision of personal data by a shareholder or proxy is necessary for the purpose specified in item 3, i.e. verification of the right to participate in the General Meeting and

for the preparation and transmission to other shareholders, the list of persons entitled to participate in the General Meeting.

In the case of an e-mail address, providing such address is voluntary, but necessary to enable contact between the Company and the Shareholder by e-mail, and failure to do so entails the impossibility of making contact 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. Transfer of data to third countries**

Personal data will not be transferred to third countries.