

**Information Notice Regarding the Processing of Personal Data of Participants in the Ordinary General Meeting (OGM),
Extraordinary General Meeting (EGM) – collectively referred to hereinafter as the "General Meeting" or "GM"**

Legal basis for providing information on the processing of personal data

Articles 13–14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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 (hereinafter: GDPR)

Identification and contact details of the Controller

Stalexport Autostrady S.A.
40-085 Katowice, ul. Adama Mickiewicza 29
NI [tax ID] 6340134211, REGON [statistical no.] 271936361, KRS [National Court Register] 0000016854
www.stalexport-autostrady.pl

Contact details of the Data Protection Officer

Katarzyna Wojtaszyn
Email: inspektor@stalexport-autostrady.pl
40-085 Katowice, ul. Adama Mickiewicza 29

Rights of the data subject

The scope of rights to which a data subject is entitled is defined by Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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 (hereinafter: GDPR), as well as the Act of May 10, 2018, on the protection of personal data (hereinafter: the Act).

Every natural person, depending on the legal basis for processing, has the right to:

- the right to access their personal data, including the right to obtain a copy thereof—in accordance with and to the extent specified in Article 15 of the GDPR;
- the right to rectify personal data if the processed personal data is inaccurate, or to request its completion if it is incomplete—in accordance with and in the cases specified in Article 16 of the GDPR;
- the right to erasure of personal data where the conditions referred to in Article 17 of the GDPR apply, for example, when the personal data is no longer necessary for the purposes for which it was collected or otherwise processed. The right to erasure of personal data does not apply in the cases referred to in Article 17(3) of the GDPR. This means that if any of the grounds referred to in that paragraph apply—for example, if the processing of personal data is necessary to comply with a legal obligation or to establish, exercise, or defend legal claims—we will not be able to erase the personal data despite your request;
- the right to restrict the processing of personal data in the cases specified in Article 18 of the GDPR;
- the right to data portability – in accordance with Article 20 of the GDPR – any person whose personal data is processed on the basis of consent or a contract, and if such data is processed by automated means, has the right to receive their personal data in a structured, commonly used, machine-readable format and to request that it be transmitted to another controller;
- the right to object at any time—for reasons related to their particular situation—to the processing of personal data based on a legitimate interest, i.e., pursuant to Article 6(1)(f) of the GDPR. Pursuant to Article 21 of the GDPR, once an objection has been raised, the Controller may no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject, or grounds related to the establishment, exercise, or defense of legal claims;
- the right to withdraw consent to the processing of personal data at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal – Article 7(3) of the GDPR.

To exercise any of the above-mentioned rights, please contact the company's designated Data Protection Officer via email (inspektor@stalexport-autostrady.pl) or by sending written correspondence to the Company's registered office address indicated above. We also encourage you to contact the Data Protection Officer by phone at +48 32 76 27 512 if you have any

questions regarding your request. In connection with your request, we may ask you to clarify the information or actions to which your request relates.

Right to lodge a complaint with a supervisory authority

Any person whose personal data is being processed also has the right to lodge a complaint with a supervisory authority if they believe that the Company is processing their personal data unlawfully. In Poland, the supervisory authority is the President of the Personal Data Protection Office. More information on how to file a complaint with the supervisory authority can be found on the website www.uodo.gov.pl

Purpose, legal basis for processing, and retention period of personal data

Personal data will be processed for the purpose of and until the fulfillment of legal obligations arising in particular from the Commercial Companies Code, capital market regulations, and other legal provisions, and relating, among other things, to the organization, conduct, and administration of the General Meeting (**pursuant to Article 6(1)(c) of the GDPR**).

Your personal data may also be processed for the purpose of pursuing the Company's legitimate interests (**Article 6(1)(f) of the GDPR**), which are considered to be:

- archiving documents for the purpose of establishing facts and ensuring the proper exercise of rights and fulfillment of obligations – the data will be processed until the statute of limitations for claims expires, and if any court or other proceedings are initiated by state authorities in connection therewith, until such proceedings are finally concluded;
- establishing and asserting potential rights, including claims or defenses against claims brought against the Controller – the data will be processed until the statute of limitations for claims expires, and in the event that any court or other proceedings are initiated by state authorities in connection therewith—until their final conclusion;
- ensuring the organizational and legal security of the General Meeting and the Company's compliance with corporate governance principles and best practices, in particular the Best Practices of Companies Listed on the Warsaw Stock Exchange, including for audit, inspection, and investigative purposes – the data will be processed for the period necessary to achieve the specified purposes, but no longer than until the expiration of the statute of limitations for claims related to the proceedings and resolutions of the General Meeting, and in the event of the initiation of judicial, administrative, inspection, audit, or investigative proceedings – until their final or definitive conclusion;
- collection of data to the extent necessary to identify and verify those entitled to participate and vote at the General Meeting and their rights – data will be processed for a maximum period until the expiration of the statute of limitations for claims, in particular regarding the deadlines for filing a lawsuit against the Company to set aside or declare a resolution of the General Meeting invalid;
- conducting various types of analyses (aggregated data) and reports for internal business purposes in connection with the Company's operations – for the time necessary, but no longer than until the purpose is fulfilled.

Personal data may be processed on the basis of consent (**Article 6(1)(a) of the GDPR**), to the extent that a shareholder, proxy, or other person authorized to participate in the General Meeting has given such consent. The data will be processed until the purpose for which such consent was given is achieved or until consent is withdrawn. Withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal of consent.

Categories of personal data processed and their source

The Company primarily processes personal data to the extent necessary to identify and verify rights attached to shares, such as data included in share certificates or documents confirming rights attached to shares, data appearing in powers of attorney, attendance lists, and shareholder lists provided by the National Depository for Securities S.A. (hereinafter: KDPW), on forms allowing for the exercise of voting rights by proxy, in shareholder statements regarding the intention to participate in the General Meeting via electronic means of communication, and in scans of documents that the shareholder is required to submit, such as: first name, last name of the shareholder, residential address, name, number, and series of the identification document, date of issue of the identification document, phone number, and email address. In addition, the Company processes data in the form of the voices of persons participating in the General Meeting in connection with the audio/video recording of the proceedings, as well as other data if the obligation to process such data arises from legal provisions or consent has been granted for their processing.

We obtain personal data: directly from participants in the General Meeting, from shareholders or proxies, and from the National Depository for Securities (KDPW).

Requirements regarding the provision of personal data

Providing personal data is voluntary, but necessary for participation in the General Meeting and the exercise of shareholder or proxy rights. Failure to provide such data may result in the inability to participate in the General Meeting or to exercise certain rights.

Categories of recipients

Your personal data may be disclosed to persons within the Company who handle corporate affairs, to the Data Protection Officer to the extent necessary for the performance of their statutory duties and obligations, to the notary public preparing the minutes of the General Meeting, to the company providing IT for the General Meeting using electronic means of communication, a postal operator, to the extent necessary for the delivery of mail, if necessary, a law firm to the extent necessary for the legal handling of matters related to or connected with the organization and conduct of the General Meeting, other IT service providers that supply tools or provide hosting services, e.g., email, which are used to process your personal data. Recipients of your personal data may also include other Shareholders to the extent that this relates to the fulfillment of the obligations referred to in Article 407 of the Commercial Companies Code. Due to the fact that the proceedings of the General Meeting (GM) will be recorded in audio format—including sound and voice—and this recording will be posted on the website at www.stalexport-autostrady.pl the recipients of the GM proceedings may include unspecified users visiting our website.

Personal data may also be transferred, based on your consent, to entities specified by you in the consent.

Your personal data may also be disclosed to public authorities, which may obtain such data in the course of specific proceedings in accordance with generally applicable laws. However, public authorities are not considered recipients within the meaning of the GDPR.

Transfer of data to a third country (outside the EEA/EU) and information on automated decision-making.

Your personal data is not currently transferred outside the European Economic Area (EEA). If it becomes necessary in the future to transfer personal data outside the EEA, the Company will carry out such a transfer exclusively in accordance with the requirements of the GDPR and using the appropriate safeguards provided for in Chapter V of the GDPR.

Your personal data will not be subject to decisions based solely on automated processing, including profiling, that would produce legal effects concerning you or similarly significantly affect your situation.