

**Apator S.A. Information Notice for Shareholders and Shareholders' Proxies**

Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council 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: the Regulation) Apator S.A. provides the following information:

<b>Data controller</b>	<b>Apator S.A.</b> 4A Gdańska Street, Flat C4, 87-100 Toruń
<b>Contact details of the Data Controller</b>	You can contact the Data Controller: <ul style="list-style-type: none"> <li>• in person</li> <li>• or via email: <a href="mailto:apator@apator.com">apator@apator.com</a></li> <li>• by telephone: +48 56 619 11 11</li> <li>• in writing: ul. Gdańska 4A, flat C4, 87-100 Toruń</li> </ul>
<b>Data Protection Officer</b>	A Data Protection Officer has been appointed at Apator S.A. and can be contacted: <ul style="list-style-type: none"> <li>• <u>in writing</u> to the Controller's address,</li> <li>• <u>by email</u>: <a href="mailto:iod@apator.com">iod@apator.com</a></li> </ul> <p>The Data Protection Officer may be contacted regarding all matters relating to the processing of personal data and the exercise of rights under the Regulation.</p>
<b>Categories of data</b>	The Controller processes, in particular, the following categories of your personal data: <ul style="list-style-type: none"> <li>• identification data (e.g. first name, surname, PESEL, NIP, identity document number)</li> <li>• contact details (e.g. residential address, email address, telephone number, address for electronic service)</li> <li>• data relating to shares and the rights arising therefrom (e.g. number of shares, type of shares, number of votes attached to the shares, share code)</li> <li>• image and voice recorded during the General Meeting</li> </ul>
<b>Source of data</b>	The Controller obtains your data: <ul style="list-style-type: none"> <li>• directly from you,</li> <li>• from the National Depository for Securities system, where the data relates to a shareholder,</li> <li>• from your principal, where a power of attorney has been granted, where the data relates to a shareholder's proxy</li> </ul>
<b>Purposes of processing and legal basis for processing</b>	The Controller will process your data for the following purposes: <ol style="list-style-type: none"> <li>1) enable the Controller, as a company listed on the Warsaw Stock Exchange, to identify its shareholders, ensure direct communication with them and facilitate the exercise of shareholders' rights and engagement in the company's affairs, including for the purpose of organising the General Meeting and enabling eligible persons to exercise their voting rights at the meeting, including, in particular, by drawing up a list of persons entitled to attend the General Meeting and verifying the entitlement to attend in person or to represent another entitled person (in particular another shareholder) at the General Meeting (legal basis: Article 6(1)(c) of the Regulation in conjunction with the Commercial Companies Code, the Act on Public Offerings and the Act on Trading in Financial Instruments),</li> <li>2) the pursuit of the Controller's legitimate interests (legal basis: Article 6(1)(f) of the Regulation), which are: <ul style="list-style-type: none"> <li>• the recording and broadcasting of the General Meeting in order to maintain high standards of communication with the capital market (in accordance with the Good Practices of Companies Listed on the Warsaw Stock Exchange),</li> <li>• the publication of a recording of the General Meeting proceedings, in order to ensure the transparency of a public company's operations and equal access to information for all shareholders,</li> <li>• establishing, pursuing or defending claims,</li> <li>• statistical and analytical purposes,</li> <li>• identifying shareholders and communicating with them to facilitate the exercise of their rights and their involvement in the company's affairs.</li> </ul> </li> </ol>
<b>The period for which the data will be retained</b>	Your personal data will be stored: <ol style="list-style-type: none"> <li>1) for as long as you retain your status as a shareholder and the Administrator fulfils its statutory obligations,</li> <li>2) for the period necessary for the Controller to fulfil its statutory obligations,</li> <li>3) recordings of the General Meeting will be retained for a period of 5 years and made publicly available on the website or YouTube channel, unless they are deleted earlier for technical reasons or following a valid objection,</li> <li>4) in all other cases – until the Controller's legitimate interest, which forms the basis for such processing, has been fulfilled or a valid objection to such processing has been lodged.</li> </ol>
<b>Data recipients</b>	For the purposes set out above, your personal data may be disclosed by the Controller to entities authorised to receive personal data pursuant to the relevant legal provisions, to entities providing the Controller with ICT or technical services, legal, notarial or advisory services, and to other entities processing personal data on the Controller's behalf. Your personal data may be disclosed to other shareholders (legal basis: Article 407 of the Commercial Companies Code). Your personal data may also be published in a current report and disclosed to the Polish Financial Supervision Authority where, in accordance with Article 70(3) of the Act of 29 July 2005 on Public Offerings and the Conditions for Introducing Financial Instruments to Organised Trading and on Public

	<p>Companies, you hold at least 5 per cent of the total number of votes at the General Meeting of Shareholders.</p> <p>Your personal data in the form of an image recorded during the General Meeting will be made available as part of the live broadcast and the publication of the recording on the Controller's website and YouTube channel.</p>
<b>Profiling and automated decision-making</b>	Your personal data will not be processed by automated means, including profiling.
<b>Rights of the data subject</b>	<p>In accordance with the Regulation, you have the right to:</p> <ol style="list-style-type: none"> <li>1) obtain confirmation as to whether your data is being processed by the Controller, as well as the right to access your data (Article 15 of the Regulation),</li> <li>2) to have your data rectified and completed (Article 16 of the Regulation),</li> <li>3) erase your data (Article 17 of the Regulation),</li> <li>4) request that the processing of your data be restricted (Article 18 of the Regulation),</li> <li>5) to have your data transferred (Article 20 of the Regulation).</li> </ol> <p>You have the right to object at any time – on grounds relating to your particular situation – to the processing of your data for the purposes of the Controller's legitimate interests. In such a case, the Controller may continue to process the data provided that it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or grounds for the establishment, exercise or defence of legal claims (Article 21(1) of the Regulation).</p> <p>To the extent that the basis for the processing of your personal data is consent, you have the right to withdraw it. Withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent prior to its withdrawal.</p> <p>You also have the right to lodge a complaint with the President of the Personal Data Protection Office if you suspect that the processing of your personal data infringes data protection legislation.</p>
<b>Transfer of data to a third country or an international organisation</b>	<p>In connection with the publication of a video on the YouTube platform, personal data (image, voice, statements) may be transferred to third countries (e.g. the USA), where the operators of the websites are based. In such cases, appropriate safeguards are applied, including standard contractual clauses approved by the European Commission (Article 46 of the GDPR).</p> <p>YouTube's (Google's) personal data processing policy is available at: <a href="https://policies.google.com/privacy?hl=pl">https://policies.google.com/privacy?hl=pl</a></p>
<p><b>Where data is provided directly to the Company, the provision of such data is required by the provisions of the Commercial Companies Code and is necessary to enable verification of the shareholder's identity; failure to provide such data may result in the inability to participate in the General Meeting. In the case of an email address and telephone number, the provision of this data is voluntary but necessary to enable contact between the Data Controller and the shareholder via email or telephone; failure to provide this data will result in the inability to be contacted by these means.</b></p>	