

Apator S.A. Information Notice for persons closely associated with a person performing management duties

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:

Data Controller	Apator S.A. 4A Gdańska Street, unit C4, 87-100 Toruń
Contact details of the Controller	You can contact the Controller: <ul style="list-style-type: none"> • in person • by email: apator@apator.com • by telephone: +48 56 619 11 11 • in writing: ul. Gdańska 4A, unit C4, 87-100 Toruń
Data Protection Officer	A Data Protection Officer has been appointed at Apator S.A., who can be contacted: <ul style="list-style-type: none"> • <u>in writing</u> to the Controller's address, • <u>by email</u>: iod@apator.com 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.
Categories of data	The Controller processes, in particular, the following categories of your personal data: <ul style="list-style-type: none"> • identification data (e.g. first name, surname, date of birth; tax identification number), • contact details (e.g. telephone number, email address; postal address), • information on the nature of the relationship with a person performing managerial duties.
Source of data	The Controller obtains your data: <ul style="list-style-type: none"> • directly from you, • from the person performing management duties.
Purposes of processing and legal basis for processing	The Controller will process your data for the purpose of: <ol style="list-style-type: none"> fulfilling the tasks and legal obligations arising from the status of a public company/issuer, including in particular maintaining a list of persons closely associated with persons performing management functions, (legal basis: Article 6(1)(c) of the Regulation in conjunction with Regulation (EU) (EU) No 596/2014 of 16 April 2014 on market abuse (Market Abuse Regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC) ensuring compliance with legal provisions and protecting interests, which constitutes a legitimate interest of the Controller (legal basis: Article 6(1)(f) of the Regulation).
Period for which the data will be stored	Your personal data will be stored: <ol style="list-style-type: none"> for the purpose of fulfilling the tasks and legal obligations arising from the status of a public company/issuer, including maintaining lists of persons closely associated with a person performing management duties – for a period of 5 years from the date of drawing up or updating the list; for the period of limitation of claims in accordance with the law.
Recipients of the data	For the purposes indicated above, your personal data may be disclosed by the Controller to entities authorised to receive personal data under relevant legal provisions (e.g. the Polish Financial Supervision Authority), entities providing the Controller with ICT or technical services, legal, notarial or advisory services, and other entities processing personal data on behalf of the Controller.
Profiling and automated decision-making	Your personal data will not be processed by automated means, including profiling.
Rights of the data subject	In accordance with the Regulation, you have the right to: <ol style="list-style-type: none"> 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), rectify and complete your data (Article 16 of the Regulation), erase your data (Article 17 of the Regulation), request the restriction of the processing of your data (Article 18 of the Regulation), to have your data transferred (Article 20 of the Regulation). <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 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 regulations.</p>
Transfer of data to a third country or an international organisation	Your personal data will not be transferred to a third country or an international organisation, unless required by law or as part of cooperation with market supervisory authorities.



The provision of personal data is a statutory requirement under the MAR Regulation. Refusal to provide data may result in a failure to comply with legal obligations on the part of the person discharging managerial responsibilities or the Controller, which may lead to legal sanctions.