

**Apator S.A. Information Notice for persons performing managerial 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:

<b>Data Controller</b>	<b>Apator S.A.</b> ul. Gdańska 4A, unit C4, 87-100 Toruń
<b>Contact details of the Controller</b>	You can contact the Controller: <ul style="list-style-type: none"> <li>• in person</li> <li>• by 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, unit C4, 87-100 Toruń</li> </ul>
<b>Data Protection Officer</b>	A Data Protection Officer has been appointed at Apator S.A., who 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> 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.
<b>Purposes of processing and legal basis for processing</b>	The Controller will process your data for the purpose of: <ol style="list-style-type: none"> <li>fulfilling the legal tasks and obligations arising from the status of a public company/issuer, including in particular maintaining a list of persons performing management functions and a list of persons closely associated with those performing management duties, notifying transactions carried out by persons discharging managerial responsibilities and persons closely associated with them (legal basis: Article 6(1)(c) of the Regulation in conjunction with Regulation (EU) No 596/2014 of the European Parliament and of the Council 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),</li> <li>to ensure compliance with the legal provisions on the prevention of market abuse and to ensure the transparency of the Controller's activities, which constitutes a legitimate interest of the Controller (legal basis: Article 6(1)(f) of the Regulation),</li> <li>fulfilling obligations under company law, including maintaining a register of persons with access to inside information (legal basis: Article 6(1)(c) of the Regulation in conjunction with the MAR Regulation).</li> </ol>
<b>Period for which the data will be stored</b>	Your personal data will be stored: <ol style="list-style-type: none"> <li>for the period required by law, in particular for a period of 5 years from the end of the calendar year in which the notification was made or the performance of management duties was completed, in accordance with the requirements of the MAR Regulation, or for a longer period if required by other legal provisions to protect the legitimate interests of the Controller (e.g. in the event of legal proceedings).</li> </ol>
<b>Recipients of data</b>	For the purposes set out 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.
<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>	In accordance with the Regulation, you have the right to: <ol style="list-style-type: none"> <li>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>rectify and complete your data (Article 16 of the Regulation),</li> <li>erase your data (Article 17 of the Regulation),</li> <li>request the restriction of the processing of your data (Article 18 of the Regulation),</li> <li>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 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 Office for Personal Data Protection if you suspect that the processing of your personal data infringes data protection regulations.</p>
<b>Transfer of data to a third country or international organisation</b>	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 surveillance authorities.



The provision of personal data is a statutory requirement under the MAR Regulation and other legal provisions. Refusal to provide data may result in the Controller or a person performing management duties failing to comply with legal obligations, which may lead to legal sanctions.