

Apator S.A. Information Notice regarding the processing of personal data in connection with the reporting of irregularities (made under the compliance procedure)

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. ul. Gdańska 4A, unit C4, 87-100 Toruń
Contact details of the Controller	You can contact the Controller: <ul style="list-style-type: none"> • in person • or via 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"> • in writing to the Controller's address, • by email: iod@apator.com <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>
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, job title) • contact details (e.g. address, telephone number) • data contained in the submitted application
Source of data	The Controller obtains your personal data: <ul style="list-style-type: none"> • directly from you • from other sources (e.g. from the person making the submission)
Purposes of processing and legal basis for processing	The Controller will process your data for the purpose of: <ol style="list-style-type: none"> 1) fulfilling the Controller's legal obligations relating to the handling of reports of irregularities, as well as preventing breaches of the law and the rules in force at the Controller (legal basis: Article 6(1)(c) of the Regulation in conjunction with the provisions of the Commercial Companies Code, Commission Delegated Regulation (EU) 2023/2772 and, in the case of specific personal data, Article 9(2)(b) or (f) of the Regulation), 2) to comply with the recommendations set out in the Code of Best Practice for Companies Listed on the Warsaw Stock Exchange, which constitutes a legitimate interest of the Controller (legal basis: Article 6(1)(f) of the Regulation), 3) to maintain ongoing communication in connection with the handling of a report or the conduct of an investigation, which constitutes the Controller's legitimate interest (legal basis: Article 6(1)(f) of the Regulation), 4) to pursue or defend against any claims arising from the reporting of irregularities or in connection with the need to demonstrate specific facts of material importance to the Controller, which constitutes the Controller's legitimate interest (legal basis: Article 6(1)(f) of the Regulation).
The period for which the data will be stored	Your personal data will be stored: <ol style="list-style-type: none"> 1) for the duration of the handling of the breach report or the conduct of the investigation, and then for a period of 3 years following the end of the calendar year in which the handling of the report was completed or the investigation concluded, unless a longer retention period is necessary for purposes related to ongoing legal proceedings or investigations, defence or the establishment of claims.
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, entities providing the Controller with ICT or technical services, legal or advisory services, other entities processing personal data on behalf of the Controller, and entities within the Apator Capital Group.
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"> 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), 2) rectify and complete your data (Article 16 of the Regulation), 3) erase your data (Article 17 of the Regulation) to the extent and in accordance with the rules set out in the Regulation, 4) to request the restriction of the processing of your data (Article 18 of the Regulation), 5) 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>
<p>Transfer of data to a third country or an international organisation</p>	<p>Your personal data will not be transferred to a third country or an international organisation.</p>
<p>The provision of personal data processed by the Controller is voluntary, but necessary for the purpose of making and investigating a breach report (under the compliance procedure).</p>	