



**Apator S.A.'s disclosure statement for stock market analysts whose details are published on
www.apator.com**

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 • 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"> • in writing to the Controller's address, • by email: 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, job title, place of work), • contact details (e.g. telephone number, email address).
Source of data	The Controller obtains your data: <ul style="list-style-type: none"> • directly from you • publicly available sources.
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) make available on the Controller's website the contact details of stock market analysts who prepare recommendations regarding Apator S.A. shares, which constitutes the Controller's legitimate interest in enabling investors to obtain independent information about Apator S.A. (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"> 1) for the duration of the publication of the recommendations on the Apator website – until the purpose of processing has been fulfilled, 2) until your objection to the processing of your personal data has been considered.
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, to entities providing the Controller with ICT or technical services, legal or advisory services, other entities processing personal data on behalf of the Controller pursuant to data processing agreements. Your personal data may be disclosed to entities within the Apator 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), 4) 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>As a general rule, your personal data will not be transferred outside the European Economic Area (hereinafter 'EEA'). However, in view of the services provided by the Controller's subcontractors in the provision of support for ICT services and IT infrastructure, the Controller may commission recognised subcontractors operating outside the EEA to carry out specific IT activities or tasks, which may result in your data being transferred outside the EEA. Individual countries outside the EEA, within whose territory your personal data will be processed, ensure an adequate level of personal data protection in accordance with EEA standards, as determined by the European Commission. However, in the event of processing within the territory of countries for which the European Commission has not determined an adequate level of personal data protection, the Controller enters into agreements with the recipients of your personal data to ensure an adequate level of such protection. The agreements referred to above are based on standard contractual clauses issued by the European Commission in accordance with Article 46(2)(c) of the GDPR. A copy of the standard contractual clauses referred to above may be obtained from the Controller. The method used by the Controller to secure your data complies with the principles set out in Chapter V of the GDPR. Accordingly, you may request further information about the safeguards applied in this regard, obtain a copy of these safeguards, and information on where they are made available.</p>
<p>Where personal data is collected directly from you, the provision of personal data is voluntary; however, failure to provide such data will prevent the fulfilment of the processing purpose indicated above.</p>	