

**INFORMATIONAL CLAUSE ON THE PROCESSING OF PERSONAL DATA BY ONDE S.A.
FOR SHAREHOLDERS WHO ARE NATURAL PERSONS, PERSONS WHO REPRESENT
THE SHAREHOLDERS WHO ARE NOT NATURAL PERSONS AND SHAREHOLDERS' PROXIES**

Pursuant to the Regulations of the European Parliament and of the Council (EU) 2016/679 of 27th April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and on repealing Directive 95/46/EC (General Data Protection Regulation) (“**GDPR**”), ONDE S.A. with its office in Toruń (“**the Company**”) or “**Controller**”) hereby informs you that in connection with convening the General Meetings of the Company (“**GM**”), the Company shall be processing the personal data of the Company’s shareholders, persons representing the Company’s shareholders, proxies of the Company’s shareholders and other persons authorized to exercise voting rights at the General Meeting, as well as the personal data disclosed during the Meeting (hereinafter jointly referred to as: “**Shareholders**” or “**you**”).

As regards the above, the Company declares that:

1. Controller of Personal Data

The Controller of the personal data of the Company’s Shareholders is ONDE Spółka Akcyjna/Joint Stock Company with its office in Toruń at 40 Wapienna Street, 87-100 Toruń, entered into the Register of Entrepreneurs of the National Court Register run by the District Court in Toruń, Commercial Division VII of the National Court Register, under KRS no.: 0000028071, holder of NIP no.: 8792070054 and REGON no.: 871098102, with share capital at an amount of PLN 1,100,600.00 - fully paid in.

The Controller shall be contacted directly in all matters related to the protection of personal data – in writing, sending the correspondence to the Controller’s address indicated below, or electronically, sending an e-mail to the following address: iod@onde.pl;

2. Legal basis

Shareholders’ personal data shall be processed pursuant to:

- a) art. 6 subpara. 1 point c) of GDPR - obligation of compliance with the generally applicable legal provisions, in particular, the provisions of the 15th September 2000 Companies Code (“**KSH**”), relating to: (i) drawing up and storing lists of shareholders entitled to participate in general meetings and general meeting attendance lists, (ii) allowing the Company’s shareholders and their proxies to participate in the general meetings, (iii) ensuring the right to vote via a proxy and (iv) allowing the Shareholders to exercise their rights in relation to the Company (for example, introducing specific matters on the agenda);
- b) art. 6 subpara. 1 point f) of GDPR - the Company’s legitimate interests, in the form of: (i) necessity to allow the Company to contact Shareholders and verify their identities, and (ii) pursuing possible claims or defence against claims.

3. Purpose of personal data processing

Personal data shall be processed by the Company in order to fulfil the Company’s duties under the provisions of the *Companies Code* (which includes drawing up a list of persons authorised to participate in general meetings and general meeting attendance lists, information obligations imposed on the Company as a public company in connection with convening general meetings, ensuring the Company’s shareholders exercising their rights in relation to the Company, and in order to verify the right to participate in person or to represent the authorised person, a shareholder included, at general meetings, and also to establish or investigate a claim or defend against claims with regard to a general meeting, which constitutes a legitimate interest of the Controller or a third party.

4. Categories of personal data

The Company shall process the following categories of the Shareholders’ personal data in connection with convening and holding general meetings:

- a) data included in the list of shareholders entitled to participate in general meetings;
- b) details of shareholders and their representatives or proxies included on the list of shareholders present at general meetings;
- c) details of shareholders and shareholders’ proxies included in the power of attorney to represent the shareholder at the general meetings;
- d) details of shareholders and their proxies included the notification on granting a power of attorney electronically
- e) details of shareholders and their representatives or proxies indicated in the request to convene a general meeting;
- f) details of shareholders and their representatives or proxies indicated in: (i) a request to make available copies of shareholders’ lists, (ii) a request regarding matters included on the agenda of a general meeting, (iii) a request to

include an issue on the agenda of a convened general meeting or (iv) an application containing a general meeting's draft resolution.

The Company may process the following categories of the Shareholders' personal data:

- a) identity details (first name and surname; PESEL number; NIP number, type, number and series of identity document);
- b) address details;
- c) contact data (telephone number, e-mail address);
- d) data with regard to the shares and the rights attached thereto, such as: (i) number, (ii) type of shares and (iii) number of votes attached to the share, (iv) shares' code

In cases where the categories of data indicated above turn out to be insufficient to achieve the purposes indicated in point 3 above, in particular, to verify the status of the shareholder, of person representing the shareholder or the shareholder's proxy - the Controller shall also process other data necessary to achieve these purposes.

5. Disclosing personal data

The Company may disclose the Shareholder's personal data to:

- a) other shareholders of the Company – with regard to sharing the list of shareholders, pursuant to Art. 407 of the *Companies Code*,
- b) legal advisors providing their services at general meetings, a notary, or other parties the Company cooperates with while organising and holding general meetings;
- c) other parties acting on behalf of the Controller;
- d) the general public - within the Company's obligation to comply with legal provisions.

6. Period of personal data storing

Your personal data shall not be stored longer than it is necessary, i.e. they shall be stored for a period necessary for the Company to carry out a general meeting and draw up its proper documentation, including the period of keeping the documentation, and after that time, for a period required by law, and also for a period necessary to determine, investigate or defend against claims that may be raised by the Company or raised against the Company in connection with the convening and holding of a general meeting.

7. Shareholders' rights

As regards the processing of your personal data by the Company, you are entitled to:

- a) the right to access personal data;
- b) the right to have personal data rectified
- c) the right to have personal data deleted (the right to be forgotten) in cases specified in the provisions of GDPR;
- d) the right to have the processing of personal data limited in cases specified in the provisions of GDPR;
- e) the right to object to the processing of personal data in cases specified in the provisions of GDPR;
- f) the right to lodge a complaint to the President of the Personal Data Protection Office.

Information with regard to raising an objection:

The right to raise an objection shall be granted due to reasons related to a particular situation of the person objecting to the processing of their personal data, pursuant to Art. 6 para. 1 point f) of Polish GDPR. In such a case the Controller shall not process the personal data, unless the Controller can indicate legally important reasons for the processing, which are superior to the interests, rights and freedoms of the person in question, or grounds for establishing, investigating or defending claims.

8. Source for obtaining personal data

The Shareholders' personal data shall be obtained from the National Depository for Securities S.A. with its seat in Warsaw, 4 Książęca Street, and also are to be submitted by the Shareholders, proxies and representatives, in particular, in connection with the need to establish a shareholder's status, holding of a proper number of shares, voting right or the right to represent the shareholder.

9. Requirement to provide data

Where data are provided to the Company directly, such provision of data is required by the *Companies Code*, and is necessary in order to verify the Shareholder's identity, and failure to provide the data shall prevent from participating in general meetings. In case of an e-mail address or telephone number, providing such data is voluntary, but necessary for contact between the Company and the Shareholder via e-mail or by telephone, and failure to provide such data shall prevent communicating in this way.

10. Automated decision making, including profiling, and direct marketing

Shareholders' personal data shall not be processed in an automated manner, including by way of profiling. Furthermore, data processing for the purposes of direct marketing shall not be provided for. Therefore, any rights associated thereto shall not apply.