

**General  
information**

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (**GDPR**), we inform you of the purpose for which we collect your personal data and how we process it.

**Data controller**

The Controller of your personal data is IPOPEMA Securities S.A. with its registered office in Warsaw (ul. Próźna 9, 00-107 Warsaw, Poland) (the **Controller**).

**Contact with  
Data Protection  
Officer**

You can contact the Data Protection Officer of the Controller by email at: [iodo.dm@ipopema.pl](mailto:iodo.dm@ipopema.pl) or by letter addressed to: IPOPEMA Securities S.A. ul. Próźna 9, 00-107 Warsaw, Poland, with a note: Data Protection Officer or *Inspektor Ochrony Danych*.

**Categories and  
types of  
personal data**

The Controller processes identification and contact types of data included in the Agreement which were provided to the Controller (such as name, surname, e-mail).

**Legal basis and  
purposes of the  
processing of  
personal data**

The personal data is processed by the Controller on the basis of:

- a) Article 6 section 1(b) of the GDPR – for the purpose of performance of the agreement to which the data subject is party or in order to take steps at the request of the data subject prior to entering into an agreement,
- b) Article 6 section 1(c) of the GDPR – in order to comply with the obligations arising from the law, including in particular tax regulations, accounting regulations and anti-money laundering and combating the financing of terrorism regulations,
- c) Article 6 section 1(f) of the GDPR – for the purposes of the legitimate interests pursued by the Controller, which the Controller believes to be, specifically: determination, enforcement and protection of claims, preventing fraud, ensuring security of ICT environment, using internal control systems, performance of the agreement concluded by the Controller with the contractor, and for other purposes constituting the Controller's legitimate interests, such as establishing, maintaining and developing business relations with the contractor, including maintaining current communication.

**Recipients of  
personal data**

The recipients of your personal data may specifically include: entities rendering advisory, auditing, accounting, IT, archiving and destruction of document records and public authorities or entities performing services on their behalf, such as the Polish Financial Supervision Authority, the Ministry of Finance, the National Tax Administration.

The Controller does not intend to transfer your personal data to any third countries (i.e. to countries that are not members of the European Economic Area) or any international organisations.

**Personal data  
storage period**

We will process your personal data as long as necessary, depending on the purpose of the processing. The data will be processed for the period required to perform the agreement, fulfil legal obligations, or for as long as we have a legitimate interest, taking into account the limitation periods for claims as provided by applicable law.

**Your rights**

You have the right to access your personal data, the right to rectification of personal data and, if applicable and in compliance with the law, you have the right to:

- a) demand erasure of personal data;
- b) demand restriction of the processing of personal data;
- c) transmit data to another controller;
- d) object to the processing of data.

In addition, you have the right to file a complaint to the President of the Office of Protection of Personal Data (pol. *Prezes Urzędu Ochrony Danych*) if it is established that the processing of personal data was in breach of the GDPR. To fulfil your rights, for security reasons we may need more information to confirm your identity.

**Source of  
personal data**

Your personal data originate from the entity that is subject to the agreement which indicated you as an attorney, representative, contact person or other authorised person for the purposes of the Agreement.

**Information  
about automated  
decision-making  
and additional  
information**

Based on your personal data there will be no automated decision making proces, including profiling.

Information about the processing of personal data at IPOPEMA Securities S.A. is available at the website at <https://www.ipopemasecurities.pl> under the "RODO" section.