

Data Protection Information Clause
for persons reporting breaches of the law and participating in investigations conducted at OTCF S.A.
on the basis of the SPEAK UP Procedure for Internal Reports of Breaches of the Law

Controller of the Personal Data

According to Article 4 item 7 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (hereinafter "GDPR") The Controller of the personal data, i.e. the entity that decides on the purposes and means of data processing, is OTCF S.A., headquartered in Kraków, ul. Saska 25C, 30-720 Kraków (hereinafter referred to as: the "Company").

Data Protection Officer

The Company has appointed a Data Protection Officer (DPO), who can be contacted on matters concerning the protection of personal data and the exercise of related rights. For this purpose, it is possible to contact by e-mail at: iod@otcf.pl or by mail at: OTCF S.A. ul. Saska 25C, 30-720 Kraków with the following note: DPO.

Purpose, Legal Basis and Term of Processing of Personal Data by the Company

The personal data provided may be processed by the Company for the purposes and on the legal grounds specified below:

- for the purpose of accepting a Report and taking possible follow-up action in accordance with the Company's Internal Whistleblower Procedure and based on the requirements of the Law of June 14, 2024 on the protection of Whistleblowers, which constitutes the Company's legitimate interest (Article 6 paragraph 1 letter f) of the GDPR),
- to conduct communications with the Whistleblower and other persons covered by the Internal Report Procedure, as required by the Law of June 14, 2024 on the protection of Whistleblowers, which is the Company's legitimate interest (paragraph 6 paragraph 1 letter f) of the GDPR),
- keeping internal records, as well as archiving records in accordance with the requirements under the Act of June 14, 2024 on the protection of Whistleblowers, which is a legal obligation of the Company (paragraph 6 paragraph 1 letter c) of the GDPR),
- fulfill the Company's obligation to report a suspected crime, if the information resulting from the Report contains the elements of a crime or fiscal crime (Article 6 paragraph 1 letter c) of the GDPR),
- asserting and defending against claims in connection with accepted Reports of breaches of laws, procedures or ethical standards applicable to the Company, which constitutes a legitimate interest of the Company (Article 6 paragraph 1 letter f) of the GDPR).

Provision of data is voluntary; however, failure to provide such data may prevent the Company from taking action on the Report, including further processing of the Report, as well as conducting communications with the Whistleblower and others.

Your personal data will be processed by the Company for the period specified in the provisions of the Act of June 14, 2024 on the protection of Whistleblowers, unless further processing is related to the need to pursue and defend against claims, as well as ongoing legal proceedings (for the duration of these proceedings).

Transfer of Personal Data

Recipients of your personal data may be entities providing legal and consulting services to the Company, as well as technical (IT) support, but only subject to the confidentiality of your data.

Your personal data will not be transferred by the Company outside the European Economic Area (EEA).

Your Rights Regarding the Personal Data Processed

You have the right to request access to your personal data, rectification, erasure or restriction of processing, and the right to object to the processing of your personal data on the grounds of your particular situation.

Your data will not be processed in an automated manner, which at the same time could lead to a decision affecting you in a legal manner or in a similar manner significantly affect you.

Notwithstanding your rights above in connection with the processing of your personal data, you have the right to lodge a complaint with the supervisory authority, which is the President of the Personal Data Protection Office (address: ul. Stawki 2, 00-193 Warsaw).