

## **Information Clause**

### **for BIOTON S.A. shareholders who are natural persons and proxies for shareholders, including shareholders who are natural persons**

#### **Data Administrator**

BIOTON S.A. with its registered office in Macierzysz, ul. Poznańska 12, 05-850 Ożarów Mazowiecki, (hereinafter: "BIOTON") informs that it is the administrator of personal data of BIOTON shareholders being natural persons and proxies of shareholders, being natural persons, who are entitled to participate in the General Meeting, demonstrated their status as shareholders or proxies of shareholders who have requested access to the list of shareholders entitled to attend a BIOTON General Meeting or the list of shareholders present at the General Meeting, have requested access to copies of motions on matters on the agenda of the General Meeting, have requested that the General Meeting be convened, have requested that matters be placed on the agenda of the convened General Meeting or have submitted a draft resolution of the General Meeting (hereinafter: collectively "Shareholders").

#### **Obtaining information on personal data processing**

BIOTON attaches great importance to the protection of personal data, which is why BIOTON S.A. decided to appoint a Data Protection Officer, who can be contacted by traditional means (address above) or by e-mail at: [iod@bioton.com](mailto:iod@bioton.com)

#### **Data acquisition and the purpose of its processing**

Shareholders' personal data is obtained from the National Depository for Securities S.A. with its registered office in Warsaw, (4 Książęca st.) and are sent by Shareholders, proxies and their representatives in particular in connection with the need to prove the shareholder status, the possession of an appropriate number of shares, the right to vote or the right to represent the Shareholder. The Shareholders' personal data is processed for the purpose of holding the BIOTON General Meeting, including for the purpose of fulfilling the obligation to make the list of Shareholders available to Shareholders upon their request. BIOTON will process your personal data in accordance with applicable regulations. The provision of your data is obligatory and results from the provisions of commercial law, due to the inclusion of data in corporate documents.

The legal basis for the processing of Shareholders' data for the purpose indicated above is the fulfilment of legal obligations (Article 6(1)(c) of RODO), related to Article 407 par. 1(1) of the Commercial Companies Code and BIOTON's legitimate interest (Article 6(1)(f) of RODO) - for the purpose of operating, conducting video monitoring by BIOTON, issuing badges as part of access control or registration of the General Meeting of Shareholders, as well as for the purpose of pursuing and defending in the event that mutual claims arise. When processing your data, BIOTON does not use profiling systems or systems leading to

any automated decision-making. The Shareholders' data will be stored for a period of 1 (one) year from the date of the BIOTON General Meeting for which they have been prepared, and in the case of a challenge to the resolutions of the General Meeting until the final conclusion of legal proceedings in this respect.

### **Recipients of the data**

On the basis of the relevant agreements, access to Shareholders' data may be obtained by entities cooperating with it, in particular entities providing services related to the performance of General Meeting duties, including entities and their authorized employees providing solutions such as tele information services, security services, legal services and Shareholders who submit a request to view the list of Shareholders, issue a copy of such list or send the list by e-mail. As a general rule, your data will not be transferred to third countries, i.e. outside the European Economic Area.

### **Rights in relation to the processing of data**

The Shareholder has rights in relation to the processing of personal data:

- ❖ the right of access to the content of their data,
- ❖ the right to rectification,
- ❖ the right to improve, erasure or restriction of processing,
- ❖ the right to data portability, i.e. the right to receive personal data from BIOTON in a structured, commonly used IT format suitable for machine reading. The Shareholder may send the data to another controller or request that BIOTON send the data to another controller. However, BIOTON will only do so if such transmission is technically possible. The right to data portability only applies to those data processed under contract,
- ❖ the right to object to the processing - in cases where BIOTON processes your personal data on the basis of its legitimate interest; the objection may be expressed on the grounds of a particular situation to the following e-mail address: [iod@bioton.com](mailto:iod@bioton.com) or the address of BIOTON's registered office with the note "Data Protection Officer".

More information on the rights of data subjects is available in Articles 12-23 of the General Data Protection Regulation (RODO/GDPR), the text of which can be found at:

<https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32016R0679>

In addition, Shareholder has the right to lodge a complaint with the supervisory authority, i.e. the President of the Personal Data Protection Office, more information at:

<https://uodo.gov.pl/pl/p/skargi>