

GDPR Information Clause for Shareholders

Pursuant to 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 (General Data Protection Regulation, hereinafter referred to as “GDPR”), please be advised as follows:

1. Data Controller

The Controller of your personal data is Gobarto SA, with its registered office at Wspólna 70, 00-687 Warsaw, Poland, entered in the Register of Entrepreneurs of the National Court Register under KRS number: 0000094093, with registration files maintained by the District Court for the Capital City of Warsaw, 12th Commercial Division of the National Court Register, holding NIP (Tax ID): 699-17-81-489, REGON (Employer Identification Number): 411141076, with share capital of PLN 278,002,290 (fully paid up), hereinafter also referred to as “the Controller”.

2. Contact Information

For all matters related to the protection of personal data, you may contact us via email at dane.osobowe@gobarto.pl or in writing at the Controller’s registered office address as indicated in Section 1.

3. Source of Personal Data

Your personal data was obtained from Krajowy Depozyt Papierów Wartościowych SA (the Central Securities Depository of Poland) with its registered office at Książęca 4, 00-498 Warsaw, Poland, in connection with your expressed intent to participate in the General Meeting and exercise your voting rights, pursuant to Article 406³ §§1, 2, 3, and 5 of the Polish Commercial Companies Code (hereinafter: the “KSH”) of 15 September 2000.

4. Categories of Personal Data

The categories of personal data processed include: first and last name, residential address, PESEL (Civil Registration Number), type of entitlements, and identification number.

Gobarto SA
Wspólna 70
00-687 Warsaw
Poland
NIP: 699 17 81 489
REGON: 411141076
BDO: 000014202

Distribution Division:
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Poland
Tel. (+48) 22 31 99 300
E-mail: biuro@gobarto.pl

Production Division:
Grąbkowo Processing Facility
Grąbkowo 73
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Poland
Tel. (+48) 65 547 70 00
E-mail: gobarto@gobarto.pl

Sales Department:
Tel. (+48) 65 547 70 40
E-mail: handel@gobarto.pl

Procurement Department:
Tel. (+48) 65 547 71 90
E-mail: skup@gobarto.pl

5. Purposes and Legal Basis for Processing Personal Data

Your personal data will be processed by the Controller based on Article 6(1)(c) and (f) GDPR for the following purposes:

- a) Enabling your participation in the General Meeting of Gobarto SA (Article 406¹ and Article 406³ §§1, 2, 4, and 5 of the KSH), exercising shareholders' rights in connection with the General Meeting under the provisions of the Commercial Companies Code (Article 401 §§ 1 and 4, Article 411, Article 421, and Article 422 §2(2) of the KSH), as well as recording and publishing the proceedings of the General Meeting in relation to shareholders who exercised their right to participate (Article 406⁵ §4 of the KSH and Principle 4.3 of the "Best Practice for GPW Listed Companies 2021");
- b) Ensuring the proper execution of tasks related to administering Gobarto SA shareholders, as legally required under applicable laws, which requires the processing of your personal data, particularly in connection with obligations arising from:
 - i. the Commercial Companies Code, such as: the preparation and signing by the Gobarto SA Management Board of the list of shareholders entitled to participate in the General Meeting, making the list available at the Management Board's office for three weekdays prior to the General Meeting, providing copies of this list, and making it available to other shareholders upon request (Article 407 §§1 and 1¹ of the KSH); the preparation, display, and retention of the attendance list at the General Meeting (Article 410 of the KSH); facilitating participation and voting at the General Meeting by proxy (Articles 412 and 412¹ of the KSH); providing copies of motions concerning matters covered by the agenda (Article 407 §2 of the KSH); and the exercise of shareholder rights to profit distribution (Article 347 of the KSH);
 - ii. the Act of 29 July 2005 on public offering and conditions governing the introduction of financial instruments to organized trading and public companies (hereinafter the "Public Offering Act") and the Regulation of the Minister of Finance of 29 March 2018 on current and periodic information provided by issuers of securities and on the conditions for recognizing as equivalent the information required by the laws of a non-member state (hereinafter the "Regulation on Current and Periodic Information"), in connection with Gobarto SA's statutory disclosure obligations as a public company, including the

requirement to disclose a list of shareholders holding at least 5% of votes at the General Meeting (Article 70(3) of the Public Offering Act);

c) Establishing, pursuing, defending, or securing any potential claims.

6. Rights of the Data Subject

As a data subject, you have the following rights regarding your personal data:

- a) Right to access your personal data, including confirmation of whether the Controller is processing it, details about such processing, and the right to receive a copy of your data (the first copy is provided free of charge);
- b) Right to rectification or completion of incomplete or inaccurate personal data;
- c) Right to request erasure of personal data;
- d) Right to request restriction of processing of personal data;
- e) Right to data portability, i.e., to receive the data provided to the Controller and transmit it to another controller, where technically feasible;
- f) Right to object at any time to the processing of personal data;
- g) Right to lodge a complaint with the Polish supervisory authority, i.e., the President of the Personal Data Protection Office (UODO), by writing to Urząd Ochrony Danych Osobowych, Stawki 2, 00-193 Warsaw, Poland, or electronically via the UODO Electronic Inbox, following the instructions available at: www.uodo.gov.pl.

7. Data Retention Period

Your personal data will be retained for the duration of your shareholder rights and for the period necessary to establish, pursue, defend, or secure any legal claims arising from your shares. Additionally, data will be stored as required by applicable legal provisions.

8. Categories of Recipients

Other shareholders may receive your personal data as part of their right to inspect the shareholder list, obtain copies, and access the attendance list at the General Meeting. Additionally, your personal data may be publicly disclosed and provided to the Polish Financial Supervision Authority (KNF), the Warsaw Stock Exchange (GPW SA), and the general public via the Internet. This

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disclosure occurs in fulfilment of obligations under the Public Offering Act and the Regulation on Current and Periodic Information, as well as complying with Principle 4.3 of the “Best Practice for GPW Listed Companies 2021,” through the publication of audiovisual recordings of the General Meeting on the Gobarto SA website. Another recipient of your data is the entity processing personal data on behalf of Gobarto SA, responsible for organizing and managing the General Meeting.

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