

INFORMATION CLAUSE ON THE PROCESSING OF PERSONAL DATA BY GENOMTEC S.A.

FOR SHAREHOLDERS WHO ARE NATURAL PERSONS, PERSONS REPRESENTING NON-NATURAL PERSON SHAREHOLDERS, AND SHAREHOLDER PROXIES

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) ("GDPR"), GENOMTEC S.A., headquartered in Wrocław (the "Company" or "Administrator"), informs that in connection with the convening and holding of the Company's General Meetings ("GM"), the Company will process personal data of the Company's shareholders, persons representing the Company's shareholders, proxies of the Company's shareholders, and other persons participating in the GM or entitled to exercise voting rights at the GM, as well as personal data disclosed during the GM (collectively referred to as "Participants" or "you").

Accordingly, the Company states that:

1. Data Controller

The personal data administrator of the Participants is GENOMTEC S.A., headquartered in Wrocław, ul. Bierutowska 57-59, 51-317 Wrocław, registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Wrocław-Fabryczna in Wrocław, VI Commercial Division of the National Court Register, under KRS number 0000662554.

For all matters related to personal data protection, please contact the Administrator directly in writing at the above address or electronically via email: investors@genomtec.com.

2. Legal Basis for Processing

Personal data of shareholders will be processed on the basis of:

- a) article 6(1)(c) GDPR – compliance with legal obligations arising from generally applicable laws, particularly the Act of 15 September 2000, the Commercial Companies Code ("CCC"), including: (i) Preparation and maintenance of shareholder lists entitled to participate in the GM and attendance lists at the GM, (ii) Enabling the shareholders of the Company and their representatives to participate in the GM, (iii) Allowing proxy voting, (iv) Enabling Participants to exercise their rights towards the Company (e.g., submitting matters to be included in the agenda).
- b) article 6(1)(f) GDPR – legitimate interest of the Company, including: (i) The need to ensure the Company can contact Participants and verify their identity, (ii) Pursuing potential claims or defending against claims.

3. Purpose of Data Processing

Personal data are processed by the Company to fulfill its obligations under the CCC (including preparing the list of persons entitled to participate in the GM and the attendance list), comply with disclosure obligations imposed on the Company as a public company in connection with convening the GM, enable Participants to exercise their rights towards the Company, verify entitlement to personal participation or representation at the GM, and establish, pursue, or defend claims related to the GM, which constitutes a legitimate interest pursued by the Administrator or a third party.

4. Categories of Personal Data Processed

In connection with convening and conducting the GM, the Company processes the following categories of personal data of Participants:

- a) data included in the list of shareholders entitled to participate in the GM;
- b) data of shareholders and their representatives or proxies included in the list of shareholders present at the GM;
- c) data of shareholders and their proxies contained in the power of attorney to represent the shareholder at the GM;
- d) data of shareholders and their proxies contained in notifications of granting a power of attorney in electronic form;
- e) data of shareholders and their representatives or proxies included in requests to convene the GM;
- f) data included in requests for copies of shareholder lists, agenda items, motions, or draft resolutions;
- g) other data provided by Participants to the Company.

The Company may process the following categories of personal data of Participants:

- a) identification data (full name, PESEL number, NIP number, type, number, and series of identity document);
- b) address data;
- c) contact details (phone number, email address);
- d) data related to shares and rights deriving from them (e.g., (i) number, (ii) type of shares, (iii) number of votes, (iv) share code).

If the above categories of data prove insufficient for verifying the status of a shareholder, representative, or proxy, the Administrator may process additional necessary data for these purposes.

5. Sharing of Personal Data

Personal data of Participants may be shared by the Company with:

- a) other shareholders – as part of disclosing the shareholder list in accordance with Article 407 CCC;
- b) legal advisors, notaries, or other entities assisting in organizing and conducting the GM;
- c) other persons authorized by the Administrator;
- d) the public – in compliance with legal obligations imposed on the Company.

6. Data Retention Period

Your personal data will be stored no longer than necessary, i.e., for the period required to conduct and properly document the GM, including record-keeping obligations, and subsequently for the period required by law and the time necessary to establish, pursue, or defend claims related to the GM.

7. Rights of Participants

As a data subject, you have the following rights:

- a) right to access personal data;
- b) right to rectify personal data;
- c) right to erase personal data ("right to be forgotten") in cases specified by GDPR;
- d) right to restrict processing in cases specified by GDPR;
- e) right to object to processing in cases specified by GDPR;
- f) right to lodge a complaint with the President of the Personal Data Protection Office.

Right to Object Information:

You have the right to object to processing based on Article 6(1)(f) GDPR due to reasons related to your particular situation. In such cases, the Administrator may not process your personal data unless they demonstrate compelling legitimate grounds for processing that override your interests, rights, and freedoms, or for establishing, pursuing, or defending claims.

8. Source of Personal Data

Personal data of Participants are obtained directly from them, as well as from the National Depository for Securities S.A. in Warsaw or from Company shareholders (who provide data of their proxies or representatives).

9. Data Submission Requirement

If data are provided directly to the Company, their submission is required by CCC regulations and to verify the identity of the Participant. Failure to provide data may result in an inability to participate in the GM. Providing an email address and phone number is optional but necessary for enabling contact between the Company and the Participant via email or phone; failure to provide these details may prevent such contact.

10. Automated Decision-Making, Including Profiling, and Direct Marketing

The personal data of shareholders will not be processed in an automated manner, including profiling. Additionally, data will not be processed for direct marketing purposes.