

STATEMENT REGARDING THE PROCESSING OF PERSONAL DATA OF LARQ S.A. SHAREHOLDERS

Pursuant to the provisions of the 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) (EU OJ L 2016 No. 119, p. 1, as amended) (hereinafter: the "GDPR"), Larq S.A. (hereinafter: the "Company") hereby informs that, in connection with the convening of its General Meetings (hereinafter: the "GMs") of the Company, the Company will process the personal data of the Company's Shareholders, proxies authorised to vote, other persons authorised to vote at the GMs, as well as personal data disclosed during the GMs (hereinafter jointly referred to as the "Shareholders" or "You").

In view of the foregoing, the Company hereby states as follows:

1. Data Controller

LARQ S.A. with its registered office in Warsaw, ul. Tamka 16, lok. U4, 00-349 Warsaw, registered under number KRS 289126 with the Business Register of the National Court Register kept by the District Court for the Capital City of Warsaw, 12th Economic Division, tax number NIP: 5252287848, with the fully paid-up share capital of PLN 799,283.30, is the Controller of Your personal data.

2. Contact Details

The following email address is designated for contact in matters of personal data protection: administrator_rod@larq.pl; You may also write to us to the address given in Section 1 above.

3. Categories of Personal Data

The categories of personal data to be processed by the Company include the following: the Shareholders' data as disclosed on the list of shareholders eligible for participation in the GM, data of shareholders and their proxies as disclosed on the list of shareholders present at the GM, data of shareholder proxies as disclosed in the proxy document authorising to represent a shareholder at the GM, data of shareholders and their proxies as disclosed in the request to convene the GM, data of shareholders and their proxies as disclosed in the request to provide copies of the lists of shareholders and in any request regarding matters included in the agenda of the GM, in any request to include a matter in the agenda of the already convened GM, or in a proposal with a draft resolution of the GM. The Company will process the following categories of Your personal data: (i) identification details (first name, surname, PESEL number or identity card number, National Depository for Securities Identifier), address details, contact details and certificate number; (ii) details of shares and entitlements carried by them such as: quantity, share class, share number, number of votes attaching to a share; (iii) – when the Shareholders prefer electronic contacts with the Company – their email address. If the data categories listed above are found insufficient for purposes stated in Section 4 below, the Data Controller will also process other data as necessary for attainment of those purposes.

4. Purpose of Data Processing and Its Legal Basis

Personal data are processed by the Company for its compliance with the obligations set out in the Commercial Companies Code, disclosure obligations of the Company as a public company relating to the convening of the GM, allowing the Shareholders to exercise their rights towards the Company, including the drafting of the list of persons entitled to participate in the GM and the verification of the right to attend in person or to represent the eligible person, including a shareholder, at the GM pursuant to Article 6 (1) (c) of the GDPR, as well as under Article 6 (1) (f) of the GDPR in order to

establish, seek or defend any claims in relation to the GM being a legitimate interest pursued by the Data Controller or by third parties.

5. Legal Basis for Processing of Shareholders' Data

The legal basis for the processing of Your personal data by the Company consists of:

- a) Article 6 (1) (c) of the GDPR– the obligation arising out of the generally applicable regulations, including the Commercial Companies Code, namely: drafting and storage of the lists of shareholders and the lists of attendance at the GM, allowing for voting by proxy, allowing the Shareholders to exercise their rights towards the Company (e.g. proposing specified matters to be included in the agenda);
- b) Article 6 (1) (f) of the GDPR– legitimate interest of the Company and the verification of identity and (ii) seeking claims, if any, or defending against claims.

6. Personal Data Storage Period

Your personal data as disclosed on the lists of shareholders, lists of attendance and proxy documents will not be stored longer than necessary, namely for the period necessary for the Company to hold the GM and for its proper documentation, including the period of documentation retention, and afterward as long as required by the law; and further for the period as necessary to establish, seek or defend any claims that may be lodged by the Company or against it.

7. Rights of Data Subjects

In connection with the processing of Your personal data by the Company, You have the following:

- a) Right of access to personal data;
- b) Right of rectification of personal data;
- c) Right of erasure of personal data (right to be forgotten);
- d) Right of limitation of processing of personal data;
- e) Right to object against the processing of personal data; and
- f) Right to lodge a complaint before the President of the Personal Data Protection Office.

Important! Right to Lodge a Complaint

The right to lodge a complaint is based on grounds of a special situation of the person lodging the complaint against the processing of his/her personal data pursuant to Article 6 (1) (f) of the GDPR. Then, the Data Controller must not process such personal data unless it can demonstrate other valid legal grounds for their processing that override the interests, rights and freedoms of the data subject, or the grounds for establishing, seeking or defending claims.

8. Data Origin

The personal data of the Shareholders are sourced from the National Depository for Securities with its registered office in Warsaw, ul. Książęca 4, and are sent by the Shareholders, proxies and agents, in particular whenever it is necessary to demonstrate the status of shareholder, that a specified number of shares is held, the right to vote or the right to represent on behalf of the Shareholder.

9. Data Recipients

The recipients of thus collected personal data are the providers of IT hosting services used for contacting the Shareholders, and the providers of document retention services as well as other Shareholders – as regards the availability of the lists of shareholders pursuant to Article 407 of the

Commercial Companies Code. Your personal data may be also received by the authorised staff of the Data Controller, legal advisors for the GM, notaries and other persons authorised to act by the Data Controller.

10. Requirement to Disclose Data

When data are provided directly to the Company, their disclosure is required in accordance with the provisions of the Commercial Companies Code and in order to allow for verification of Shareholder identity; any refusal to disclose them would prevent the participation in the GM. As regards the disclosure of email address, its provision is voluntary, however, it is necessary to enable email communication between the Company and a given Shareholder. If denied, any contacts in that way will be impossible.

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

No personal data of the Shareholders will be subject to any automated processing, including profiling. Furthermore, no data processing is expected for purposes of direct marketing. Therefore, no such rights exist.

12. Transfer of Data to Third Countries

Your personal data will not be transferred to any third countries.