

**Information Clause  
for Processing Data in connection with Investor Relations**

Pursuant to Article 13(1) and Article 13(2) of 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) (OJ EU L 2016 no. 119, p. 1) (hereinafter “GDPR”), please be advised that:

**1. Data Controller and Data Protection Officer**

The Controller of your personal data is Dom Development S.A. with its registered office in Warsaw, Pl. Piłsudskiego 3, 00-078 Warszawa. The Controller has appointed a Data Protection officer, whom you may contact in respect of any matters relating to personal data protection by email at [iodo@domd.pl](mailto:iodo@domd.pl) or by post at the above-mentioned address of the Controller’s registered office, with the note “Data Protection Officer”.

**2. Purpose and Legal Basis of Data Processing**

Your personal data will be processed for the following purposes:

- a) discharging the legal duties and obligations arising from the status of a public company/issuer, including, but not limited to, the maintenance of lists of persons closely related and persons in executive roles at the Controller and persons having access to confidential information (Article 6(1)(c) of the GDPR in conjunction with Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse – regulation on market abuse and repealing Directive 2003/6/EC of the European Parliament and of the Council, and Directives 2014/2004/124/EC, 2003/125/EC and 2004/72/EC of the European Commission), if your personal information is required to appear on such a list,
- b) making a list of persons entitled to participate in the general meeting of the Controller (the “GM”), making it possible to participate in the GM and the verification of the right to participate in the GM in person or to represent a person entitled to participate in the GM, including representing a shareholder at the GM (Article 6(1)(c) of the GDPR in conjunction with the Code of Commercial Companies), if under applicable laws you are a shareholder of the Controller, or your personal data are required to appear on such a list, and you are entitled to participate in the GM in connection with the above purposes,
- c) the fulfilment and exercise by the Controller of obligations and rights arising from the terms and conditions of a bond issue under the Bonds Act as imposed on the Controller in connection with the convening of the Bondholder Meeting (the “BM”) and enabling the bondholders to exercise their rights towards the Controller, including preparing a list of persons entitled to participate in the BM, enabling participation in the BM and verification of the right to participate in person or to represent an authorized person, including to

represent a bondholder, if, under applicable laws, you are a bondholder of the Controller, or your personal data are required to appear on such a list, and you are entitled to participate in the BM in connection with the above purposes,

- d) enabling the identification of the Controller's shareholders, ensuring direct communication with them and facilitating the exercise of shareholders' rights and the involvement of shareholders in matters concerning the Controller,
- e) the establishment, exercise or defence of claims (if any), for example, in connection with a GM resolution being challenged, which constitutes a legitimate interest of the Controller (Article 6(1)(f) of the GDPR).

### **3. Categories of Personal Data Processed**

The scope of your personal data processed by the Controller, including your name and surname, is necessary for the achievement of the aforementioned purposes.

### **4. Data Source**

If you are a shareholder of the Controller, your personal data comes from the system of the Krajowy Depozyt Papierów Wartościowych S.A. ("KDPW S.A.") (*the Central Securities Depository of Poland*) or directly from you. It is transferred to KDPW S.A., and subsequently to the Controller, as a result of your notification to the entity maintaining the securities account of your intention to participate in the Controller's GM and pursuant to Article 406.3 §2 of the Code of Commercial Companies.

If you are a proxy for a shareholder, your personal data comes from a copy of the proxy provided to the Controller and from your ID document, or its copy, which you provided to the Controller.

If you are a bondholder of the Controller, your personal data comes from the system of the KDPW S.A. or directly from you.

If you are a person closely related, your personal data comes from the respective executive at the Controller.

### **5. Voluntary Data Provision**

If you are a shareholder of the Controller, the provision of your personal data is mandatory for the purpose of participation in the GM, to draw up and provide to the PFSA, or to another shareholder, a list of persons entitled to participate in the GM and to verify your eligibility to participate in the GM.

If you are a bondholder of the Controller, the provision of your personal data is mandatory for the purpose of participation in the BM, to draw up and provide to the PFSA, or to another bondholder,

a list of persons entitled to participate in the BM and to verify your eligibility to participate in the BM.

If you are in an executive role at the Controller, the provision of your personal data and of the personal data of persons closely related to you is mandatory for the purpose of fulfilment of the Controller's legal obligations.

## **6. Retention Period**

Your personal data will be processed for the duration of the obligation to keep this data for the following purposes, in particular:

- a) for discharging the legal duties and obligations arising from the status of a public company/issuer, including in particular the maintenance of lists of persons closely related and persons in executive roles at the Controller and persons having access to confidential information - for 5 years after the list has been made or updated, or
- b) for making a list of persons entitled to participate in the General Meeting of the Controller (the "GM"), making it possible to participate in the GM and the verification of the right to participate in the GM in person or to represent a person entitled to participate in the GM, including representing a shareholder at the GM - for 10 years from the date of receipt by the Controller of a list of persons entitled to participate in the GM of the Controller, in the case of shareholders of the Controller, or for 10 years from the date of receipt by the Controller of the proxy document, in the case of a shareholder appearing in person at the GM, or for a period of 10 years from the date of receipt by the Controller of the proxy document, in the case of a proxy of a shareholder,
- c) for making a list of persons entitled to participate in the BM, and verification of the right to participate in the BM in person or to represent a person entitled to participate in the BM, including representing a bondholder at the BM - for 10 years from the date of receipt by the Controller of a list of persons entitled to participate in the BM of the Controller, in the case of bondholders of the Controller, or for 10 years from the date of receipt by the Controller of the proxy document, in the case of a bondholder appearing in person at the BM, or for a period of 10 years from the date of receipt by the Controller of the proxy document in the case of a proxy of a bondholder, or
- d) for enabling the identification of the Controller's shareholders, ensuring direct communication with them, facilitating the exercise of shareholders' rights and the involvement of shareholders in matters concerning the Controller - for 12 months from the date of becoming aware that the specific person is no longer a shareholder of the Controller,
- e) until the limitation period for claims provided for by law expires.

## **7. Data Recipients**

Your personal data may be shared with entities that the Controller engages to perform tasks requiring data processing, such as email management, hosting, IT, administrative, legal, or

advisory services. Your personal data may also be shared with entities or authorities authorised to receive it - but only in justified cases and in accordance with applicable law.

If you are a shareholder of the Controller, your personal data may be shared with other shareholders, in connection with their right to view the list of shareholders, in connection with making the list of shareholders available for viewing in the Management Board's premises and the right to receive a copy of that list, and the Polish Financial Supervision Authority (the "PFSA"), pursuant to Article 70(2) of the Act on Public Offerings and the Conditions for the Introduction of Financial Instruments to an Organised Trading System, and on Public Companies.

If you are a bondholder of the Controller, your personal data may be shared with other bondholders, in connection with their right to view the list of bondholders, in connection with making the list of bondholders available for viewing and the right to receive a copy of that list.

## **8. Your Rights**

With regard to the processing of personal data, you have the right to: access, rectify or erase your personal data, restrict its processing, and transfer your data. If your personal data is processed on the basis of legitimate interests, you have the right to object to the processing for reasons associated with your particular situation. You also have the right to object to the processing of your personal data for direct marketing purposes. You have the right to file a complaint with the supervisory authority competent for personal data protection (President of the Personal Data Protection Office).

## **9. Transfer of Data Outside the European Economic Area**

Your personal data are, in principle, not transferred outside the EEA, but if you are a shareholder of the Controller, your personal data may be sent outside the EEA on the basis of Article 407 §1.1 of the Code of Commercial Companies, which stipulates that our shareholder may request the list of shareholders to be sent to the address indicated by them or, if you are a bondholder of the Controller, the personal data may be sent outside the EEA on the basis of Article 56 of the Bonds Act, which stipulates that our bondholder may request the list of bondholders to be sent to the address indicated by such bondholder. Moreover, as the Controller sources IT tools and services externally, some of your personal data may be transferred to countries outside the European Economic Area, but only on an appropriate legal basis.

*Detailed information concerning the legal basis for such transfer is available from the Controller.*