

## **Agora S.A. privacy notice**

### **I. Controller, Data Protection Officer and contact details**

The controller of personal data is Agora S.A. with its registered office in Warsaw (00-732), Czerska 8/10 (the "**Controller**"). The Controller can be contacted by writing to the indicated address of the registered office or the e-mail address of the Data Protection Officer provided below. The Controller has appointed a Data Protection Officer who can be contacted at the following address: [iod@agora.pl](mailto:iod@agora.pl) or in writing at the Controller's address provided above.

### **II. Purposes and bases of processing**

Personal data will be processed in order to pursue the legitimate interests of the Controller, in particular internal administrative purposes within the Agora Group<sup>1</sup>, pursuant to Article 6(1)(f) 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 "**GDPR**"), i.e. for the purpose of:

1. efficient and rational management of the Agora Group, including analytical and statistical activities, and in some cases also in order to contact you, if possible in the light of the applicable law (the legitimate interest consists in the efficient and rational management of the Agora S.A. Group by the Controller, including the analysis of interest in the products and services of the Agora Group in order to adapt the offers to the changing market environment, and the expectations of contractors, as well as the possibility of contacting you in order to establish and maintain further business relationships);
2. possible establishment or pursuit of claims or defence against such claims by the Controller (the legitimate interest consists in the possibility of establishing or pursuing claims or defending against claims).

### **III. Data recipients**

Personal data may be transferred to entities providing services to the Controller, such as sales, IT, archiving or document destruction, accounting, tax, debt collection, legal, consulting, auditing, postal and courier services, as well as correspondence handling, as well as to statutory auditors, banks and insurers or entities authorised under the law.

### **IV. Retention period**

Personal data will be processed until the Controller fulfils the purpose referred to in point II.1., unless an effective objection to such processing is lodged beforehand. The retention periods may be extended each time by the period of limitation of claims, if the processing of personal data is necessary for pursuing possible claims or defending against such claims by the Controller.

### **V. Source and scope of data**

The data was obtained from an entity from the Agora S.A. Group, of which you are a client or a contact person. The scope of data may include: identification data (e.g. name, surname, position); contact data (e.g. telephone number, email address, company, Tax Identification Number (NIP), National Business Registry Number (REGON), address, position); data on the scope of cooperation (e.g. on business conditions and results of cooperation, including billing or payment data, information on account manager).

### **VI. Transfer of data to third countries**

As a rule, the Controller does not transfer data outside the European Economic Area (EEA). Such a transfer will only take place if an adequate level of data protection is ensured, which is established in particular by: cooperation with data processors in countries for which a relevant decision of the European Commission has been issued, the use of standard contractual clauses issued by the European Commission, the application of binding corporate rules approved by the competent supervisory authority and, where necessary, ensuring other safeguards necessary to ensure an adequate level of data protection. Upon request, the Controller will provide a copy of the information about the above-mentioned security features or a copy thereof.

### **VII. Rights**

You have the right to: access the content of the data, including receiving a copy of it and request its rectification, erasure, restriction of processing, the right to data portability, object to the processing of personal data based on a legitimate interest, for reasons related to your specific situation, lodge a complaint with the supervisory authority dealing with the protection of personal data, if you believe that the processing of personal data violates the provisions of the GDPR. In Poland, such an authority is the President of Personal Data Protection Office. In order to exercise the rights, the Controller should be contacted via the contact details indicated in point I above.

### **VIII. Profiling and automated decisions**

The data will not be used for automated decision-making, including profiling, within the meaning of Article 22 of the GDPR, i.e. to make a decision that produces legal effects or similarly significantly influences.

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<sup>1</sup> The list of entities from the Agora Group is available at this address: <https://www.agora.pl/about-agora#slide-capital-group-1>