

Privacy notice for shareholders of CARLSON INVESTMENTS SE

Pursuant to Article 14(1)–(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) (the “GDPR”), we inform you that:

- I. **The controller of your personal data is CARLSON INVESTMENTS SE** with its registered office in Warsaw, Rondo ONZ 1, level 10, 00-124 Warsaw, National Court Register (KRS) No. 0000965148 (the “Company”).
- II. For matters concerning the protection of your personal data, you may contact the Company by email at office@carlsonvc.com or in writing at the address given in section I.
- III. **We obtained your personal data** from the Central Securities Depository of Poland (Krajowy Depozyt Papierów Wartościowych) in connection with your stated intention to attend the General Meeting and exercise your voting rights, pursuant to Article 406³ § 1, 2, 3 and 5 of the Commercial Companies Code.

IV. Purposes and legal bases for processing.

Pursuant to Article 6(1)(c) and (f) GDPR, we will process your data to:

1. enable you to attend the Company's General Meeting of Shareholders (Article 406³ § 1, 2, 4 and 5 of the Commercial Companies Code) or exercise other shareholder rights relating to the General Meeting (Article 401 § 1, § 4 and § 5 of the Commercial Companies Code);
2. properly perform tasks relating to services for holders of the Company's shares – the legal basis is that processing is necessary for compliance with the Company's legal obligations, in particular:
 - 1) those arising under the Act of 15 September 2000 – Commercial Companies Code, such as the Company's Management Board signing the list of shareholders entitled to attend the General Meeting and making it available at the Management Board's premises for three business days before the General Meeting for inspection by other shareholders, making copies and sending them to other shareholders (Article 407 § 1, 1¹ and 2 of the Commercial Companies Code);
 - 2) fulfilling a shareholder's right to profits (347 of the Commercial Companies Code);
 - 3) the disclosure obligation under the Act of 29 July 2005 on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and Public Companies; and
 - 4) the disclosure obligation under the Regulation of the Minister of Finance of 6 June 2025 on current and periodic information provided by issuers of securities and the conditions for recognising as equivalent information required under the laws of a non-Member State.

V. Disclosure of data

In connection with the processing of your data for the purposes specified in section IV above, recipients of your personal data may include other shareholders exercising their right to inspect the list of shareholders made available at the Company's premises and to receive a copy of that list. Your personal data may also be published in a current report and provided to the Polish Financial Supervision Authority if, pursuant to Article 70(3) of the Act of 29 July 2005 on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and Public Companies, you hold at least 5% of the votes at the General Meeting of Shareholders.

VI. Data retention period

Your personal data will be processed for as long as there is an obligation to retain them for the purposes specified in section IV above, and thereafter for the period and to the extent required by applicable law.

VII. Rights of data subjects

Under the GDPR, you have:

- 1) the right to access your data and receive a copy;
- 2) the right to rectify (correct) your data;
- 3) the right to erasure, restriction of processing or objection to processing;
- 4) the right to data portability;
- 5) the right to lodge a complaint with a supervisory authority.

VIII. Basis for requesting data

Providing your personal data is necessary for the purposes specified in section IV above. Without these data, we cannot fulfil those purposes.