Information Clause

Extraordinary General Meeting of Benefit Systems S.A. convened for 15 December 2026

Information clause for shareholders of Benefit Systems S.A. and proxies of shareholders of Benefit Systems S.A.

In connection with the provisions 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**"), Benefit Systems S.A. hereby provides information regarding the processing of personal data.

I. Data Controller

Benefit Systems S.A. with its registered office in Warsaw, Plac Europejski 2, 00-844 Warsaw (hereinafter "**we**" or "**Benefit Systems**") is the data controller. Benefit Systems may be contacted as follows:

- by e-mail: daneosobowe@benefitsystems.pl;
- via the contact form available at: https://corp.benefitsystems.pl/pomoc-i-obsluga/rodo/;
- in writing to: Pl. Europejski 2, 00-844 Warsaw, with the note "Personal Data".

II. Data Protection Officer

In matters relating to the protection of personal data, our Data Protection Officer may be contacted as follows:

- by e-mail: iod@benefitsystems.pl;
- in writing to: Pl. Europejski 2, 00-844 Warsaw, with the note "DPO".

III. Purpose and Legal Basis

The purposes and legal bases for the processing of personal data are as follows:

- compliance with a legal obligation consisting in organizing the Extraordinary General Meeting and enabling authorized persons to exercise voting rights thereat, as well as making available for inspection the list of persons entitled to participate in the Extraordinary General Meeting, pursuant to Article 6(1)(c) GDPR;
- processing of data contained in documents submitted for the purpose of confirming the identity of the signatory, as well as recording and broadcasting the proceedings of the Extraordinary General Meeting, pursuant to Article 6(1)(f) GDPR, within the framework of the legitimate interests of Benefit Systems consisting in promoting transparency of operations in accordance with the requirements of the Commercial Companies Code and ensuring equal access to the decisions and discussions held during the Extraordinary General Meeting;
- for purposes related to the possible establishment, assertion or defence of claims. We act on the basis of our legitimate interest consisting in the ability to establish, assert or defend against claims, pursuant to Article 6(1)(f) GDPR.

IV. Source of personal data and categories of personal data

Personal data may be obtained: i. from the National Depository for Securities (KDPW) with its registered office in Warsaw (00-498), ul. Książęca 4; ii. directly from the shareholder, where the personal data concern the shareholder or their proxy or representative; iii. from the principal granting the power of attorney, where the data concern the shareholder's proxy.

The Company processes the following categories of personal data of shareholders or their proxies or representatives: identification data, address data, contact data and image.

V. Retention period for personal data

Personal data of shareholders or proxies shall be retained for a period of 1 (one) year from the date of the Extraordinary General Meeting, unless a longer retention period is required under applicable law, and in the event resolutions of the Extraordinary General Meeting are challenged, until the final conclusion of the relevant court proceedings.

Where personal data are processed on the basis of the legitimate interests of Benefit Systems, the personal data shall be processed until an objection to the processing is raised or until the expiry of the limitation period for claims.

VI. Recipients of personal data

Personal data may be disclosed to the following entities: other shareholders, where the data concern shareholders of the Company pursuant to Article 407 § 1 and § 11 of the Commercial Companies Code, providers of IT and IT security support services, providers of data storage and destruction services, legal and tax advisors, and audit service providers.

Personal data of shareholders or their proxies or representatives in the form of their image recorded during the proceedings of the Extraordinary General Meeting may be disclosed as part of the live broadcast and publication of the recording on the Company's website.

Recipients of personal data may also include other shareholders pursuant to rights arising under applicable law. Personal data may also be disclosed to public authorities in cases provided for by law.

VII. Rights related to the processing of personal data

In connection with the processing of personal data by Benefit Systems, shareholders or their proxies/representatives are entitled to the following rights:

- the right of access to personal data;
- the right to request rectification of personal data;
- the right to request erasure of personal data;
- the right to request restriction of processing of personal data;
- the right to data portability;
- the right to object to the processing of personal data for purposes related to the legitimate interests of Benefit Systems.

To exercise the above rights, please contact the Data Controller or the Data Protection Officer using the contact details provided in the "Data Controller" and "Data Protection Officer" sections above.

You also have the right to lodge a complaint with the supervisory authority responsible for personal data protection, i.e. the President of the Personal Data Protection Office.

VIII. Automated decision-making and profiling

No decisions are made solely on the basis of automated data processing that would produce legal effects concerning the data subject or similarly significantly affect the data subject. No profiling is carried out on the basis of personal data either.

IX. Obligation to provide data

Providing personal data results from a legal requirement and is necessary for the purposes specified in the "Purpose and Legal Basis" section above, including for the preparation and provision to shareholders, upon request, of the list of persons entitled to participate in the Extraordinary General Meeting and for the verification of entitlement to participate in the Extraordinary General Meeting.

X. Transfer of personal data outside the EEA

As a rule, personal data are not transferred outside the European Economic Area (EEA). Certain data recipients (e.g. providers of technological solutions) may process personal data in third countries.

We make every effort to ensure that data transfers are compliant with applicable law and that appropriate safeguards are implemented. This includes, in particular, the application of standard contractual clauses. You may contact us to obtain a copy of the safeguards adopted. Contact details are provided in the "Data Controller" or "Data Protection Officer" sections above.

Detailed information on how we process personal data and on the rights available may be found in our Privacy Policy: https://benefitsystems.pl/en/privacy-policy/