

INFORMATION ON PROCESSING PERSONAL DATA IN BANK MILLENNIUM S.A.

(for shareholders and proxies of shareholders of Bank Millennium S.A. who are natural persons)

This document (hereinafter: “**Principles**”) is to present information explaining the principles of processing of your personal data as a shareholder (the “**Shareholder**”), as adopted in Bank Millennium S.A. (hereinafter: the “**Bank**”). Below you will find information on, *inter alia*, for what purposes and for how long the Bank processes or will process your personal data. You will find the categories of entities which may have access to your personal data, as well as what rights you may exercise in relation to the processing of your personal data. The scope of information provided corresponds to the requirements stemming from EU personal data protection regulations, i.e. Regulation (EU) 2016/679 of the European Parliament and of the Council also known as the General Data Protection Regulation (hereinafter: the “**Regulation**”). This document consist the fulfilment of the obligation of the Bank under Article 13 or 14 of the Regulation. Detailed information about principles of processing personal data is available on <https://www.bankmillennium.pl/en/data-protection>.

Data Controller, Data Protection Officer

- Bank Millennium S.A. with seat in Warsaw is your personal Data Controller:
 - address: ul. Stanisława Żaryna 2A, 02-593 Warszawa,
 - telephone: (+48) 801 331 331 or (+48) 22 598 40 40 - for mobiles and calls from abroad,
 - e-mail: kontakt@bankmillennium.pl.
- The Bank - as data controller - shall spare no effort to ensure that the requirements of the Regulation are complied with to the greatest possible extent and thereby to protect your personal data.
- Personal data processing in the Bank is supervised, for correctness, by the Data Protection Officer (hereinafter: “**Data Protection Officer**”):
 - address: Data Protection Officer, Bank Millennium S.A., ul. Stanisława Żaryna 2A, 02-593 Warszawa,
 - e-mail: iod@bankmillennium.pl.

You may contact the Data Protection Officer regarding any and all issues connected with the processing of your personal data, also if you have doubts about your rights.

Why and for how long will we process your personal data?

- The Bank guarantees that it shall process your personal data exclusively for specific, clear and legitimate (legally justified) purposes and shall not process such data any further in a way contrary to said purposes. The purpose of data processing is the reason why we process your personal data. If the Bank wants to process your personal data for other purposes than listed below, you will be informed about this new purpose in a separate communication. The table below provides a summary of data processing purposes. Each purpose from the list below has been thoroughly assessed by the Bank for compliance with the provisions of the Regulation and regulations governing the Bank’s activity. The table presented below each time indicates a data processing purpose and its relevant legal basis. Your personal data shall be stored for a time appropriate to ensure the implementation of indicated purposes.

The purpose	Explanation	Legal basis	The duration of data processing
Depending on your relations with the Bank, your personal data is processed for following purposes:			
Fulfilment of duties resulting from legal regulations	In this case, the Bank processes your personal data in order to fulfil the duties imposed by legal regulations. These duties concern, among others: stock registration, fulfilment of information obligations; preparing, storing and making available lists of Shareholders, attendance lists and the list of Shareholders holding at least 5% of the number of votes at ordinary or extraordinary general meeting (the “ General Meeting ”), real-time public broadcasting (streaming) of the General Meeting, enabling the exercise of rights in relation to the Bank, i.e.: participating in General Meeting and exercising the right to vote, submitting specific matters to the agenda, requesting the sending of a list of shareholders entitled to participate in the General Meeting, requesting a copy of motions in matters covered by the agenda of the General Meeting, exercising the obligation to provide information; exercising the right to participate in profit, exercising of pre-emptive rights, providing information in accordance with Articles 69 and 70 of the Act on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and Public Companies. These duties result i.a. from	The Regulation art. 6 sec. 1.c)	<ul style="list-style-type: none"> - For the period necessary to establish and exercise the rights of the Shareholder, including conducting General Meetings and their proper documentation. - If a resolution of the General Meeting is challenged - until the legally valid conclusion of the proceedings in this respect. - In the event that a Shareholder files an application with a registry court to oblige the Management Board to provide information - until the legally valid conclusion of the proceedings in this respect. - As regards processing of personal data for purposes of accounting documentation - during the period of 5 years counting from the end of the calendar year, in which operations, transactions and proceedings were/will be

	the Code of Commercial Companies, the Act on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and Public Companies, the Act on Trading in Financial Instruments, the Accounting Act, tax law.		<p>ultimately finished, repaid, settled or time-limited</p> <ul style="list-style-type: none"> - As regards processing of personal data for purposes of tax documentation - during the period of 5 years counting from the end of the calendar year, in which tax payment term expired. - In other cases - until the time of the Bank's fulfilment of the duties specified in particular legal provisions. <p><i>During this period as well as after its end the Bank may process personal data based on other purposes and legal grounds defined below.</i></p>
Exercise of the power of attorney, including participation in General Meeting and exercise of voting rights	This includes all actions aimed at carrying out the power of attorney granted to you, including verification of the validity of the power of attorney, enabling participation in the General Meeting and the exercise of voting rights, if you have been appointed as a proxy.	The Regulation art. 6 sec. 1.f)	<ul style="list-style-type: none"> - Until the actions taken in order to exercise of the power of attorney have been completed. <p><i>During this period as well as after its end the Bank may process personal data based on other purposes and legal grounds defined below.</i></p>
Purposes stemming from legitimate interests of the controller	<p>Purposes implemented under a so-called legitimate (legally justified) data controller's interest are:</p> <ol style="list-style-type: none"> 1) any and all activities undertaken in order to organise and conduct General Meetings, including verifying your identity, 2) assuring the safety of persons and of the Bank's property, including the monitoring of the Bank's branches, with due respect for privacy and dignity of persons, 3) if this is applicable, for purposes related to conducting litigations and also proceedings before public authorities as well as other proceedings, also for the purpose of pursuing claims and defending against claims, 4) internal administrative, analytical and statistical purposes, including internal reporting of the Bank and within the Bank's Capital Group, 5) replying to questions or enquiries submitted as well as communication with Shareholders and their proxies, including via the Bank's website, 6) recording and sharing recordings of the General Meeting on the Bank's website with the possibility of playback by each website user at a time and place chosen by such user, in order to ensure the transparency of the Bank's operations, equal access to decisions and discussions at the General Meeting and ensuring compliance with the spirit of transparency of public companies expressed in the Best Practices of WSE Listed Companies. <p>In assessing if given objectives are legitimate (legally justified) the Bank shall consider whether your interests, rights or freedoms do not override the Bank's legitimate interests.</p>	The Regulation art. 6 sec. 1.f)	<ul style="list-style-type: none"> - During a period of up to 3 months in case of video monitoring. - For a period necessary to respond your question or inquiry. - Until the time of fulfilment of the Bank's legitimate interest constituting the basis for such processing or making an effective objection against such processing, no longer than until the end of the calendar year, in which the relevant claim limitation period expires. - If during the a/m period there is a dispute or proceedings are pending, in particular in court, personal data shall be processed for a period determined in accordance with the applicable provisions of the Civil Code governing limitation periods, which will be counted from the day of ending the dispute or legally valid termination of the proceedings.

Where do we obtain your personal data from?

5. The Bank processes your personal data obtained directly from you (e.g. provided in connection with the need to demonstrate the status of a Shareholder, holding an appropriate number of shares, exercising the right to vote at General Meetings, exercising the right to represent a Shareholder). Depending on your relationship with the Bank, your data may also come from other entities, e.g. the person granting you a power of attorney (the Shareholder) or be obtained from other sources (e.g. obtained from the National Depository for Securities, *Krajowy Depozyt Papierów Wartościowych S.A.*).

In each of the indicated cases the Bank will scrupulously verify if it has legal grounds for the processing of personal data.

What personal data categories do we process?

6. The Bank may process, in particular, the following personal data categories:
- a) identification data (e.g. name, surname, PESEL number, NIP number, number and series of ID card),
 - b) contact data (e.g. telephone number, e-mail address, correspondence address),
 - c) communication data (e.g. data resulting from communication with you),
 - d) audio-visual data (e.g. data connected with recording images for security purposes and images or voice in connection with the broadcasting (streaming), recording and sharing of recordings of the General Meeting on the Bank's website to any users, at a time and place chosen by them),
 - e) data relating to the shares and the rights stemming therefrom, such as: (i) the number, (ii) the type of shares and (iii) the number of votes attached to the shares, (iv) the ISIN code of the shares.

Whom may your personal data be disclosed to?

7. Access to your personal data - internally within the Bank's organisational structure - shall be provided solely to duly authorised Bank employees and only to the necessary extent. In certain situations your personal data may be disclosed by the Bank to recipients from outside of the Bank's structures. Under such circumstances the Bank shall always scrupulously examine the legal basis for personal data disclosure. It is necessary to underscore that according to the Regulation a data recipient shall mean both an entity processing personal data on behalf of the Bank as well as an entity to which data are disclosed for its own purposes (e.g. public administration bodies).

The following may be recipients of your personal data:

- a) public bodies or entities authorised to demand access or receive personal data under the law e.g. Financial Supervision Commission, President of the Personal Data Protection Office, the company operating the regulated market (*Giełda Papierów Wartościowych w Warszawie S.A.*),
 - b) entities to which the Bank has outsourced personal data processing on the basis of concluded agreements e.g. courier service providers, IT providers, entities providing advisory-control services e.g. auditing companies, entities processing data for purpose of issuance of legal opinions or providing court representation e.g. law offices as well as providers of other services, processing data on the Bank's behalf,
 - c) entities within the Capital Group of Bank Millennium S.A. responsible for the implementation of contractual and reporting duties,
 - d) other Shareholders - as regards making the list of Shareholders available in accordance with Article 407 of the Commercial Companies Code.
8. A detailed list of personal data recipients is available at <https://www.bankmillennium.pl/en/data-protection>.

Exercising rights

9. Detailed information on your rights:
- a) you have the right to access your personal data, which includes obtaining data copies,
 - b) if you decide that your personal data processed by the Bank are not true, you have the right to correct or supplement such data,
 - c) you have the right to demand your personal data to be erased in cases provided for by relevant laws,
 - d) you have the right to file your demand for limitation of your personal data processing,
 - e) you have the right to file an objection against the processing of your personal data in case of their processing in order to implement a legitimate interest of the Bank,
 - f) you also have the right to receive your personal data from the Bank in a structured format and transfer personal data to another data controller, In case of transferring data, due to other legal regulations, it may be required to obtain your or other person's consent or to satisfy other conditions required under these regulations,
 - g) You have the right not to be covered by a decision based exclusively on automatic processing, including profiling, which triggers legal consequences with respect to you or significantly affects you in another way, unless this decision is required to perform the agreement, is permitted by law or you have previously clearly consented thereto,
 - h) in cases when personal data processing is performed based on the consent given, you have the right to withdraw your consent with respect to specific purposes of processing, at any time. You may withdraw the consent in a Millennium Branch, by phone or e-mail. The withdrawal of consent shall not affect the legitimacy of the processing which was performed before the consent was withdrawn.
10. Providing personal data is voluntary but necessary in order to establish and exercise the rights of the Shareholder, including taking part in the General Meeting.
11. In case the Bank's processing of your personal data is deemed to be in breach of the Regulation, you have the right to file a complaint to the supervision body, i.e. President of the Personal Data Protection Office.
12. Details regarding your rights connected with data processing can be found at <https://www.bankmillennium.pl/en/data-protection>.

Decisions taken in an automated way

13. The Bank shall not process your personal data in an automated way, which might result in automated decision-making, including decisions based on profiling. If you are subject to a decision based on automatic processing, you will be independently informed about this - together with information about the principles of taking such a decision as well as its importance and anticipated consequences.