

**INFORMATION ON PERSONAL DATA PROCESSING
(Potential Clients)**

Following the provision of your personal data, in order to fulfil the information obligation under Article 13 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"), Noble Securities S.A. with its registered office in Warsaw hereby informs you that:

1. Name and contact details of the Controller:

Noble Securities S.A. with its registered office in Warsaw, ul. Prosta 67, 00-838 Warsaw, KRS no. 0000018651 ("**Controller**") is the Controller of your personal data.

2. Contact details of the data protection officer:

The Controller has appointed the Data Protection Officer, who you may contact using the following address: Data Protection Officer of Noble Securities S.A., ul. Prosta 67, 00-838 Warsaw, e-mail address: iod@noblesecurities.pl or through the electronic form available at www.noblesecurities.pl

3. Supervisory authority in the scope of personal data protection in Poland:

The President of the Personal Data Protection Office is the supervisory authority competent for the protection of personal data in Poland. You have the right to lodge a complaint concerning personal data protection issues to the President of the Personal Data Protection Office.

4. Objectives and legal basis for personal data processing:

Your personal data will be processed for the following purposes:

- 1) participation in promotions organised and co-organised by the Controller (where you have given your consent),
- 2) receiving commercial information from the Controller through electronic communication if you have given your consent ,
- 3) the use by the Controller, towards you, for direct marketing purposes, of telecommunications terminal equipment and automatic calling systems, including telephones, SMS and MMS, if you have given your consent ,
- 4) Article 6(1)(b) of the GDPR – to implement the agreement concluded with the Controller, as well as to take action in connection with the interest in the services provided by the Controller and the intention, seeking to conclude a Contract with the Controller,
- 5) to fulfil the legal obligation imposed on the Controller, in particular under the provisions of Commission Delegated Regulation (EU) 2017/565 of 25 April 2016, and to handle your complaints and respond to your letters (Article 6(1)(c) of the GDPR),
- 6) to pursue the legitimate interests of the Controller (Article 6(1)(f) of the GDPR).

5. Legitimate interests pursued by Noble Securities SA:

By processing your personal data, the Controller pursues the following legitimate interests: acting to conclude a contract with the Controller on behalf of the Client, conducting direct marketing by the Controller, carrying out/organising promotions and contests, conducting communication, also through means of electronic communication, and pursuing, establishing and securing claims.

6. Information about the categories of recipients of your personal data:

- 1) persons authorised by the Controller,
- 2) entities processing personal data under a data processing agreement concluded by the Controller and persons authorised by these entities,
- 3) entities to which the Controller has provided personal data based on the provisions of law or agreements concluded, e.g. Poczta Polska, couriers, supervision and control authorities.

7. Information about the intention to transfer your personal data to a third country or international organisation:

The Controller does not intend to transfer your personal data to any third country or international organisation.

8. Period during which your personal data shall be stored:

If processed, your personal data will be stored:

- 1) on the basis of consent – until the date of revocation or the cessation of the purpose for which the consent was given,
- 2) in connection with the conclusion of the agreement and its performance, as well as for the purpose of carrying out a contest and organising a promotion – for the period appropriate for the limitation of claims referred to in Article 118 of the Civil Code and an additional 6 months, counted from the date of termination of the agreement/end of the promotion or contest.
- 3) in connection with seeking to conclude a contract, when a contract has not been concluded, including in connection with the Controller's legal obligations towards those interested in the Controller's services – 6 months from the date of completion of the MiFID Survey or submission of an instruction to send information about the Controller's regulations.

9. Information about your rights related to the processing of your personal data:

- 1) the right to request access to your personal data from the Controller,
- 2) the right to have your personal data rectified,
- 3) the right to erase your personal data,
- 4) the right to restrict the processing of your personal data,
- 5) the right to object to the processing of your personal data,
- 6) the right to data portability,
- 7) the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal – in the case of your consent.

10. Information whether providing personal data is a statutory or contractual requirement, or a requirement necessary to enter into an agreement, as well as whether you are obliged to provide personal data and what the consequences of failure to provide such data are:

The provision of your personal data:

- 1) related to receiving of commercial information by means of electronic communication or the use by the Controller towards you, for the purposes of direct marketing, telecommunications terminal equipment and automatic calling systems, including telephones, SMS and MMS messages – the provision of personal data is voluntary, and the consequence of not providing it will be failure to receive commercial information by you by means of electronic communication or failure to use towards you by the Controller for the purposes of direct marketing, telecommunications terminal equipment and automatic calling systems, including telephones, SMS and MMS messages;
- 2) related to participation in promotions and contests organised and co-organised by the Controller – the provision of data is voluntary and the consequence of not providing it will be the lack of possibility to participate in such promotions.
- 3) related to the expressed interest in the services provided by the Controller, the intention (will) to conclude a Contract – the provision of personal data is voluntary, but is a condition:
 - a. to assess your level of knowledge of investing in financial instruments and your experience in investing in financial instruments in order to determine whether a given financial instrument which is the subject of the brokerage service offered is appropriate for you, taking into account your individual situation determined on the basis of the information presented – the consequence of failing to provide personal data will be the inability to make the aforementioned assessment and to conclude a contract with the Controller, and
 - b. to receive an electronic notification containing the address of the website and an indication of where on the website you can find the information required by law.
- 4) related to the representation of the Potential Client (legal person or organisational unit without a legal personality) – providing the data is a condition for representing the Potential Client (legal person or organisational unit without legal personality) and assessing the level of your knowledge of investing in financial instruments and experience in investing in financial instruments in order to determine whether a given financial instrument which is the subject of the brokerage service offered is suitable for the Potential Client (legal person or organisational unit without legal personality).

11. Information about automated decision-making, which is based solely on automated processing, including profiling, and which produces legal effects for the data subject or similarly significantly affects them, information about the logic involved, as well as about the significance and the envisaged consequences of such processing for the data subject:

Based on the Potential Client's personal data, the Controller makes automated decisions, including profiling, i.e. the processing of the Potential Client's personal data to assess the characteristics of the Potential Client. The Controller performs profiling of the Potential Client's personal data, in particular in order to determine the scope of services and the type of products that may be offered to the Client by the Controller, and in order to fulfil the obligations related to counteracting money laundering and financing of terrorism. Such decisions are necessary to conclude or implement the agreement with the Controller. These decisions are taken on the basis of an assessment of the information made available by the Potential Client or on the basis of information available in public registers. Decisions affect the Controller's ability to provide services to the Potential Client, as well as the Potential Client's access to the Controller's products and services.