



- 1 - this document provides the basis for updating (supplementing) personal data of the Proxy if he/she is acting as:
  - a) a proxy for other Accounts (if such proxy documents have been granted) or
  - b) a Client, if Noble Securities S.A. maintains for them other Accounts, bond or investment certificate registers, or sponsor registers.
- 2 - Providing a LEI is required for legal persons and business units without legal personality, and providing another transaction reporting identifier is required for foreign natural persons not conducting business activity.

**INFORMATION ON PERSONAL DATA PROCESSING  
(Attorneys/Representatives)**

In connection with your function as a Proxy or Representative of a client of Noble Securities S.A. ("Client") and with the provision of your personal data either by you or by the person/entity you represent, Noble Securities S.A., based in Warsaw, acting in fulfilment of its information obligation under Articles 13-14 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 ("GDPR"), hereby informs you as follows:

**1. Name and contact details of the Controller:**

Noble Securities S.A. based 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. Your Proxy or Representative may contact the Data Protection Officer at the following address: Data Protection Officer of Noble Securities S.A., ul. Prosta 67, 00-838 Warsaw, e-mail address: [iod@noblesecurities.pl](mailto:iod@noblesecurities.pl) or through the electronic form available at [www.noblesecurities.pl](http://www.noblesecurities.pl)

**3. Supervisory authority in charge of personal data protection:**

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

**4. Objectives and legal basis for personal data processing:**

Your personal data will be processed in accordance with the following provisions:

- 1) Article 6(1)(b) of the GDPR – to implement the agreement concluded by the Client with the Controller (applies only to agreements with partners of a civil partnership),
- 2) Article 6(1)(c) of the GDPR – to fulfil the legal obligation imposed on the Controller, including the obligation to counteract money laundering and terrorist financing, submit FATCA and CRS declarations and file reports,
- 3) Article 6(1)(f) of the GDPR – to pursue the Controller's legitimate interests.

**5. Legitimate interests pursued by the Controller:**

The necessity to ensure proper verification of the Proxy/Representative, effective communication with them, the performance of the agreement concluded by the Client with the Controller, and the establishment, exercise or defence of legal claims by the Controller.

**6. Categories of relevant personal data (in cases when your data have been transferred by the Client):**

Ordinary personal data, including: full name, PESEL number, type, series and number of the identity document, tax identification number, transaction reporting identifier, registered address, residential address, correspondence address, e-mail address, telephone number, nationality, and the date, country and place of birth.

**7. Information about the categories of recipients of your personal data:**

- 1) persons authorised by the Controller,
- 2) entities processing personal data on the basis of a data processing agreement concluded with NS, as well as persons authorised by those 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, Polish Financial Supervision Authority, courts, prosecutor's offices, other supervision and control authorities.

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

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

**9. Data retention period:**

Your personal data will be stored for the period required to perform the agreement with the Client. Upon the termination of the agreement or in the case of dismissal/resignation from your function, your data will be retained for an additional period justified by the pursuit or defence of claims to which the Controller is entitled, in accordance with Article 118 of the Polish Civil Code, or for a period justified by the applicable accounting or tax regulations, whichever of these periods expires later, and for an additional six (6) months thereafter.

**10. 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 their personal data rectified,
- 3) the right to have their personal data erased,
- 4) the right to restrict the processing of their personal data,
- 5) the right to object to the processing of their personal data,
- 6) the right to data portability.

**11. Source of personal data (in cases where your data were provided by the Client):**

Your personal data have been provided to the Controller by the Client, who identified you as an attorney(representative).+

**12. Information on whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into an agreement, and whether you are obliged to provide your data, together with the consequences of failing to do so (applicable where you provided the data yourself):**

The provision of your personal data:

- 1) in connection with an agreement concluded with the Client (excluding telephone number and e-mail address) is voluntary; however, failure to provide such data will result in:
  - a. for a Representative – the inability to conclude the agreement;
  - b. for an Attorney – the inability to represent the Client before the Controller.
- 2) for the purpose of fulfilling legal obligations imposed on Noble Securities S.A. as the Controller, including those arising under the Act on Counteracting Money Laundering and the Financing of Terrorism, failure to provide the data will result in:
  - a. for a Representative – the inability to conclude the agreement;
  - b. for an Attorney – the inability to represent the Client before the Controller.
- 3) for the purpose of effective communication – the provision of your telephone number or e-mail address is voluntary; however, failure to provide them will result in the inability to ensure effective communication.

**13. Information about automated decision-making based solely on the automated processing of personal data, including profiling, which produces legal effects concerning the data subject or similarly significantly affects that person, as well as the principles on which such decisions are made and their significance and anticipated consequences for the data subject:**

Based on your personal data, the Controller makes automated decisions, including profiling, that is, the processing of your personal data for the assessment of your characteristics. The Controller conducts profiling of your personal data, in particular to fulfil obligations related to the prevention of money laundering and terrorist financing. Such decisions are necessary to conclude or implement the agreement between the Client and the Controller. Such decisions are made on the basis of information provided by you or information available in public registers. Such decisions affect the Controller's ability to provide services to the Client or the Client's access to the Controller's products and services.