



Information Clause

Extraordinary General Meeting of Benefit Systems S.A. convened for 10 March 2026

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

In connection with 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, hereinafter: "GDPR"), Benefit Systems S.A. provides the following information concerning 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: www.benefitsystems.pl/en/help/rodo;
- in writing, at: Pl. Europejski 2, 00-844 Warszawa, with the annotation „Personal Data”.

II. Data Protection Officer

For 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, at: Pl. Europejski 2, 00-844 Warszawa, with the annotation „IOD”.

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 the organisation of the Extraordinary General Meeting and enabling eligible persons to exercise their voting rights at the Meeting, as well as making available 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 and the registration and transmission of the proceedings of the Extraordinary General Meeting, pursuant to Article 6(1)(f) GDPR, within the legitimate interests of Benefit Systems consisting in promoting operational transparency in accordance with the requirements of the Commercial Companies Code and ensuring equal access to decisions and discussions at the Extraordinary General Meeting;
- for purposes related to the establishment, assertion, or defence of possible claims. We act based on our legitimate interest in establishing, asserting, or defending 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 Krajowy Depozyt Papierów Wartościowych S.A. (KDPW), with its registered office in Warsaw (00-498), ul. Książęca 4;



- ii. directly from the shareholder, where the data concern the shareholder or their proxy or representative;
- iii. from the principal in the event a power of attorney has been granted and 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 (likeness)..

V. Personal Data Retention Period

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

Where personal data are processed based on the legitimate interest of Benefit Systems, data will be processed until an objection is lodged 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 Company shareholders pursuant to Article 407 §1 and §11 of the Commercial Companies Code; entities providing IT, support, and security services; entities providing data storage and data destruction services; legal and tax advisors; audit firms.

Personal data of shareholders or their proxies or representatives in the form of their image recorded during the Extraordinary General Meeting may be made available as part of real-time transmission and publication of the recording on the Company's website.

Other shareholders may also be recipients of personal data in accordance with their statutory rights. Personal data may also be disclosed to public authorities where required by law.

VII. Rights Related to Personal Data Processing

In connection with the processing of personal data by Benefit Systems, shareholders and their proxies/representatives have 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;
- the right to data portability;
- the right to object to the processing of personal data carried out on the basis of 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 sections "Data Controller" and "Data Protection Officer".

Data subjects 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 based solely on automated processing that would produce legal effects or similarly significantly affect the data subject are made.

Personal data are also not subject to profiling.



IX. Obligation to Provide Data

The provision of personal data arises from a legal requirement and is necessary for the purposes described in the section "Purpose and Legal Basis", for preparing and providing the shareholder, upon their request, with the list of persons entitled to participate in the Extraordinary General Meeting and for verifying 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). Some data recipients (e.g., providers of technological solutions) may process data in third countries. We make every effort to ensure that such data transfers are lawful and that appropriate safeguards are implemented, including, in particular, the use of standard contractual clauses.

You may contact us to obtain a copy of the safeguards used. Contact details are provided in the sections "Data Controller" and "Data Protection Officer" above.

Detailed information on how we process personal data and the rights of data subjects can be found in our Privacy Policy: www.benefitsystems.pl/en/privacy-policy