

Information

for shareholders of PKN ORLEN S.A. being natural persons and for proxies, including proxies of shareholders being natural persons

1. Please be advised that Polski Koncern Naftowy ORLEN S.A., with its registered office at ul. Chemików 7, Płock, Poland, (hereinafter referred to as PKN ORLEN S.A.) is the controller of the personal data of PKN ORLEN S.A. shareholders being natural persons and of proxies of shareholders being natural persons, who are entitled to participate in the General Meeting, have demonstrated their status as shareholders or shareholder proxies, demanded to be provided with a list of shareholders entitled to participate in the General Meeting of PKN ORLEN S.A. or a list of shareholders present at the General Meeting, submitted requests to be provided with copies of motions or proposals regarding any matters on the agenda of the General Meeting, submitted a demand that the General Meeting be convened, a motion that specific matters be placed on the agenda of the General Meeting that has been convened or a draft resolution of the General Meeting (hereinafter jointly referred to as Shareholders). PKN ORLEN S.A. contact telephone numbers are: (+48) (24) 256 00 00, (24) 365 00 00, (22) 778 00 00.
2. The Data Protection Officer at PKN ORLEN S.A. may be contacted via the following email address: daneosobowe@orlen.pl.
3. The personal data of Shareholders is obtained from the Central Securities Depository of Poland – Krajowy Depozyt Papierów Wartościowych S.A. of Warsaw, ul. Książęca 4, or is sent by the Shareholders or their proxies or representatives, in particular in connection with the need to demonstrate that a person has the status of a shareholder, holds a required number of shares or voting rights or that a person has the right to represent a Shareholder.
4. The personal data of Shareholders is processed for the purpose of carrying out the General Meeting of Polski Koncern Naftowy ORLEN S.A., including for the purpose of meeting the obligation to make available to Shareholders a list of shareholders if so requested.
5. The legal basis for the processing of Shareholders' data for this purpose:
 - a) need to comply with legal obligations (Article 6.1(c) of the GDPR) in conjunction with Art. 407.1(1) of the Commercial Companies Code, Art. 70.2 of the Act on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and Public Companies (with respect to a list of shareholders), and Section 2.a, Section 3 and Section 7.2 of the Rules of Procedure for the General Meeting of PKN ORLEN S.A.
 - b) legitimate interests of PKN ORLEN S.A. (Article 6(1)(f) of the GDPR), i.e. the establishment, exercise and defence of mutual claims.
6. Shareholders' data may be disclosed by PKN ORLEN S.A. to entities cooperating with it, in particular to entities providing services related to the holding of a General Meeting, including IT services, security services and legal services, as well as to shareholders who demand to inspect a list of shareholders, be provided with a copy of such list, or have such list sent by email.
7. Shareholders' data will be stored for 1 (one) year from the date of the General Meeting of PKN ORLEN S.A. for which the data was prepared, and in the event that

any General Meeting resolution is challenged – until the related legal proceedings have ended with a final court decision.

8. Shareholders will have the following rights related to the processing of their personal data:
 - the right to access their data,
 - the right to rectification,
 - the right to erasure or restriction of processing,
 - the right to data portability, i.e. the right to receive their personal data from PKN ORLEN S.A. in a structured, commonly used and machine-readable format. A Shareholder may transmit the data to another data controller or request that PKN ORLEN S.A. transmit the data to another controller. However, PKN ORLEN S.A. will only do so if such transmission is technically feasible. The right to data portability applies only to the data processed on the basis of a contract,
 - the right to object to processing – where PKN ORLEN S.A. processes your personal data for its legitimate interests; objections on grounds relating to your particular situation may be sent by email to daneosobowe@orlen.pl or to PKN ORLEN S.A.'s registered address, with the note "Data Protection Officer".
9. A Shareholder has the right to bring a complaint to the President of the Data Protection Authority.