

**INFORMATION CLAUSE**  
**for natural persons entering the area of Grupa Azoty**  
**Zakłady Azotowe Kędzierzyn S.A.**

This clause is addressed to natural persons who enter the area of Grupa Azoty ZAK S.A., (hereinafter the "you"). Your personal data will be collected in connection with the 24-hour protection of the area supervised by Grupa Azoty ZAK S.A., including the operation of the access control system and video monitoring in Grupa Azoty ZAK S.A. According to Art. 13 and 14 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter "GDPR"), we would like to inform you that:

- 1) The Controller of your personal data is Grupa Azoty Zakłady Azotowe Kędzierzyn S.A. based in Kędzierzyn-Koźle, 47-220, Mostowa 30A, entered in the Register of Entrepreneurs kept by the District Court in Opole, 8th Commercial Division of the National Court Register under the KRS number 0000008993, with a Tax Identification Number: PL 749-00-05-094 and REGON: 530544497 (hereinafter "Grupa Azoty ZAK S.A." or "Controller"). Contact with the Controller is possible at the following e-mail address: zak@grupaazoty.com or by mail at Grupa Azoty Zakłady Azotowe Kędzierzyn S.A., ul. Mostowa 30A, p.o. box 163, 47-220 Kędzierzyn-Koźle.
- 2) In matters related to the protection of personal data in the Company, please contact the Data Protection Officer via the e-mail address of the Data Protection Officer: iod.zak@grupaazoty.com or correspondence address: Data Protection Officer, Grupa Azoty Zakłady Azotowe Kędzierzyn S.A., ul. Mostowa 30A, p.o. box 163, 47-220 Kędzierzyn-Koźle.
- 3) Your personal data will be processed:

- a. in order to fulfil the legal obligation imposed on the Controller (Article 6, item 1 (c) of the GDPR);

Processing is often necessary in order to meet the legal obligations of the Controller or is directly prescribed by the law. The most important regulations on the basis of which the Controller processes your personal data include:

- Act on the protection of persons and property;
- regulations on preventing acts prohibited by law; and
- other regulations imposing obligations, instructions or recommendations issued by authorized state bodies or institutions;

- b. for purposes arising from legitimate interests pursued by the Controller (Article 6, item 1 (f) of the GDPR);

Processing may be considered necessary for the legitimate interests of the Controller or a third party if it does not unduly affect your interests or fundamental rights and freedoms. We always strive to strike a balance between your legitimate interests and your privacy during processing of personal data on this basis. In case of processing based on this legal basis, we analyze the risks of violation of your rights or freedoms and the measures adopted to protect your personal data. Examples of such legitimate interests are:

- ensuring the safety of persons staying within the area of Grupa Azoty ZAK S.A. ,
- ensuring the security of property located within the area of Grupa Azoty ZAK S.A. ,
- keeping secret information protected by law,
- Controller's internal administrative goals, including statistical purposes,
- handling complaints and inquiries,
- setting or pursuing civil law claims by the Controller as part of the conducted activity, as well as defending against such claims.

- 4) The scope of personal data processed by us includes the following personal data: name, surname, telephone number, PESEL number or document number confirming the identity, the image recorded on the document entitling them to move on the area supervised by Grupa Azoty ZAK S.A. and in the system used for issuing these documents (if applicable), image

- captured on video monitoring and other data indirectly identifying your identity (such as vehicle registration numbers).
- 5) We collect your personal data either directly from you or from other sources (e.g. from your employers, transport organizers, schools or universities, if they are, for example, tour operators) providing your personal data during the process of issuing passes. In case of monitoring, the data is collected automatically by consolidating the image and other data enabling the identification of identity through the monitoring system.
  - 6) Providing or entrusting your personal data may be necessary to perform the contract concluded by Grupa Azoty ZAK S.A. These data can be shared or entrusted to the following entities:
    - a. entities providing services related to the protection of persons and property, including monitoring,
    - b. suppliers of IT and monitoring systems used by Grupa Azoty ZAK S.A. in this process, as well as entities providing servicing of these systems,
    - c. entities providing advisory and auditing services for Grupa Azoty ZAK S.A., to law firms providing legal services for the Controller.
  - 7) Monitoring recordings may also be forwarded to competent authorities, in particular the Police, the prosecutor's office or courts, if the Company is obliged to do so on the basis of law or for the purpose of pursuing possible claims by the Company or defending against claims.
  - 8) Your data are processed only for the implementation of specific objectives of the Controller. If data is no longer necessary for the purposes of processing, they are regularly deleted. We process your personal data for the purposes set out below for the time specified below.

<b>The name of the destination</b>	<b>Description of the purpose of the destination</b>	<b>Legal basis for processing</b>	<b>Processing period</b>
Ensuring of safety	Your personal data is processed to ensure the safety of persons and property, including the use of video monitoring of the plant and the area around the plant	The legal obligation of the Controller (Article 6, item (c) of the GDPR) Legitimate interests of the Controller (Article 6, item (f) of the GDPR)	In case of data used for issuing documents entitling to move on the area supervised by Grupa Azoty ZAK S.A. – 3 years from the date of returning the pass In case of data captured on video monitoring - maximum 3 months

Providing personal data to state authorities	Your data may be transferred to competent state authorities, in particular to the police, prosecutor's office or courts, if Grupa Azoty ZAK S.A. is obliged to do so on the basis of legal regulations	The legal obligation of the Controller (Article 6, item (c) of the GDPR)	The period until the final conclusion of the proceedings
Query support	Your personal data is processed for the purpose of processing your inquiries by the Controller	Legitimate interests of the Controller (Article 6, item (f) of the GDPR)	The period necessary to complete the investigation procedure

Notwithstanding the above periods, your data may be processed for the purposes of determining or pursuing civil claims by the Controller in the course of its activity, as well as defending against such claims - for appropriate periods of limitation of such claims, i.e. in principle not longer than for 6 years from the occurrence of the event resulting in the claim.

In case of monitoring, the Controller may secure copies of recordings in cases referred to in item 7 above, until the final conclusion of the proceedings.

9) You have:

- the right to request access to the content of your personal data,
- the right to request correction of data,
- the right to demand the deletion of data,
- the right to demand limitation of data processing,
- the right to request data transfer,
- the right to rise objection to data processing;

It should be remembered that these rights are not absolute and the provisions provide for exceptions to their application.

10) You have the right to lodge a complaint with the competent supervisory authority (in Poland, this body is the President of the Office for Personal Data Protection), when you believe that the processing of personal data concerning you violates the provisions of the GDPR.

11) Providing personal data collected by the Controller is not directly required by law and is voluntary, but the failure to provide the required data is the inability to enter on the area of the Grupa Azoty ZAK S.A.

12) This clause was updated on January 22, 2020 and may be subject to further changes. If it will be required by law, all information regarding future changes or additions to the processing of personal data described in this clause that may affect you will be communicated to you through the appropriate form of communication usually used by the Controller in dealing with you.