

## **Information on personal data processing for persons reporting violations of the Code of Ethics of LOTOS Group and persons affected by the report**

### **I. Personal data controller**

The controller of your personal data within the meaning of Article 4 point 7 of the Regulation (EU) 2016/679 of the European Parliament and of the Council dated 27 April 2016 on the protection of natural persons in relation 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 referred to as "the GDPR"), provided in the notification of a breach of the LOTOS Capital Group Code of Ethics is a company within the LOTOS S.A. Capital Group, the actions of which are the subject of the notification, i.e.:

- Grupa LOTOS S.A. with its registered office at ul. Elbląska 135, PL 80-718 Gdańsk,
- LOTOS Infrastruktura S.A. with its registered office at ul. 3-go Maja 101, 38-200 Jasło,
- LOTOS Terminale S.A. with its registered office at ul. Łukasiewicza 2  
43-502 Czechowice-Dziedzice,
- LOTOS Petrobaltic S.A. with its registered office at ul. Stary Dwór 9, 80-758 Gdańsk,
- LOTOS Asphalt Sp. z o.o. with its registered office at ul. Elbląska 135, PL 80-718 Gdańsk,
- LOTOS-Air Bp Sp. z o.o. with its registered office at Al. Grunwaldzka 472 B 80-309 Gdańsk,
- LOTOS Kolej Sp. z o.o. with its registered office at ul. Michałki 25, 80-716 Gdańsk,
- LOTOS Lab Sp. z o.o. with its registered office at ul. Elbląska 135, PL 80-718 Gdańsk,
- LOTOS Ochrona Sp. z o.o. with its registered office at ul. Elbląska 135, PL 80-718 Gdańsk,
- LOTOS Oil Sp. z o.o., with its registered office at ul. Elbląska 135, PL 80-718 Gdańsk,
- LOTOS Paliwa Sp. z o.o. with its registered office at ul. Elbląska 135, PL 80-718 Gdańsk,
- LOTOS Serwis Sp. z o.o. with its registered office at ul. Elbląska 135, PL 80-718 Gdańsk,
- LOTOS Straż Sp. z o.o. with its registered office at ul. Elbląska 135, PL 80-718 Gdańsk,
- LOTOS Upstream Sp. z o.o. with its registered office at ul. Elbląska 135, PL 80-718 Gdańsk

### **II. Data Protection Officer**

Where a controller has appointed a Data Protection Officer, the Data Protection Officer may be contacted on all matters relating to the processing of personal data and the exercise of rights in relation to data processing. A Data Protection Officer has been appointed in:

- Grupa LOTOS S.A., e-mail [iod@grupalotos.pl](mailto:iod@grupalotos.pl),
- LOTOS Asphalt Sp. z o.o., e-mail [odo@lotosasfalt.pl](mailto:odo@lotosasfalt.pl),
- LOTOS Terminals S.A., e-mail [iod@lotosterminal.pl](mailto:iod@lotosterminal.pl),
- LOTOS Petrobaltic e-mail [iod@lotospetrobaltic.pl](mailto:iod@lotospetrobaltic.pl),
- LOTOS Kolej Sp. z o.o., e-mail [iod@lotoskolej.pl](mailto:iod@lotoskolej.pl),
- LOTOS Ochrona Sp. z o.o., e-mail [iod@lotosochrona.pl](mailto:iod@lotosochrona.pl),
- LOTOS Paliwa Sp. z o.o., e-mail [iod@lotospaliwa.pl](mailto:iod@lotospaliwa.pl).

### **III. Purposes of personal data processing**

Your personal data will be processed for the purposes related to the conduct of the investigation triggered by the notification of an infringement of the Code of Ethics of LOTOS Group and the possible assertion or repulsion of claims resulting from the notification.

### **IV. Legal basis for processing personal data**

The legal basis for the processing of your personal data is the legitimate interest of the controller in accordance with Article 6(1)(f) of the GDPR, which consists in ensuring the compliance in the LOTOS Group S.A. Capital Group with the assumed standards of operation in business and social relations connected with archiving in pursuit of a legitimate interest in preserving information in the event of a legal obligation to prove the facts, as well as for the purposes of establishing, investigating or defending against or defense against the claims indicated above.

### **V. Sharing personal data**

Your personal data may be transferred to entities processing personal data on behalf of the controller, among others to Grupa LOTOS S.A., entities operating IT systems used to achieve the above mentioned objectives, entities providing archiving and maintenance services, as well as legal advisors and auditors - whereby such entities process data on the basis of a contract with the controller and only in accordance with the controller's instructions. In justified cases, data may be transferred to entities authorized by law.

### **VI. Data retention period**

Your personal information will be retained by the controller for a period of 3 years after the conclusion of the investigation.

### **VII. Rights of data subjects**

You are entitled to:

- a) the right to access the content of your data and to receive a copy of it,
- b) the right to rectify (correct) your data,
- c) the right to erasure and restriction of processing of personal data,

- d) the right to object to the processing of personal data on grounds relating to the particular situation of the data subject in the case where the controller processes data on the basis of its legitimate interest. You may object at any time by sending correspondence in electronic form or in writing to the addresses indicated above.

In order to exercise your rights, please contact the data controller or the Data Protection Officer. The contact details are provided above.

Moreover, you have the right to lodge a complaint to the President of the Office for Personal Data Protection (to the address of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warsaw), in the case that the processing of personal data violates the applicable provisions on personal data protection.

**VIII. Information on data requirements**

Providing personal information is voluntary, however if you do not provide it, your application cannot be successfully processed.

**IX. Information about personal data profiling**

Your personal data will not be profiled and will not be used for automated decision-making.