

## Personal data processing notice for shareholders

In performance of the obligation under Article 13(1) and (2) and Article 14(1) and (2) 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 (General Data Protection Regulation, "GDPR"), we would like to inform you that:

1. **Tarchomińskie Zakłady Farmaceutyczne "Polfa" Spółka Akcyjna with its registered office in Warsaw**, address: ul. A. Fleminga 2, 03-176 Warszawa (KRS [National Court Register] number: 27741, hereinafter referred to as "Data Controller" or "TZF Polfa S.A.") is the controller of your personal data.
2. The Data Controller has appointed a Data Protection Officer, who can be contacted by writing to: [iod@tzf.pl](mailto:iod@tzf.pl).
3. Your personal data will be processed by the Data Controller for the following purposes and on the following legal bases:

Legal basis	Purposes of processing
GDPR Article 6(1)(c) – legal obligations incumbent on TZF Polfa S.A. that arise from:	<ul style="list-style-type: none"><li>a) fulfilling the obligations under the Code of Commercial Companies Act of 15 September 2000 (hereinafter referred to as CCC), in particular through the following:</li><li>b) requesting to amend the register of shareholders and cooperating with the entity in charge of keeping the register of shareholders as regards conducting proceedings for making entries and changing entries in the register of shareholders, including entries on Shareholders who have not submitted the shares they hold for dematerialization by 1 March 2021 – pursuant to Article 6(1)(c) of the GDPR in conjunction with Article 328[4] of the CCC;</li><li>c) preparing and storing a list of persons authorised to participate in the General Meeting and preparing and storing attendance lists and minutes from the General Meeting – pursuant to Article 6(1)(c) of GDPR in conjunction with Article 407 of the CCC, Article 410 of the CCC and Article 421 of the CCC;</li><li>d) 3. processing requests to include certain matters in the agenda pursuant to Article 6(1)(c) of GDPR in conjunction with Article 401 of the CCC, as well as processing other requests from shareholders submitted during the GM pursuant to Article 421 of the CCC;</li><li>e) 4. exercising voting rights during the General Meeting – pursuant to Article 6(1)(c) of GDPR in conjunction with Article 412 and Article 412[1] of the CCC;</li><li>f) 5. exercising Shareholder's right to profit pursuant to Article 6(1)(c) of GDPR in conjunction with Article 347 of the CCC.</li></ul>

### Tarchomińskie Zakłady Farmaceutyczne „Polfa” S.A.

Sąd Rejonowy dla m.st. Warszawy w Warszawie

XIV Wydział Gospodarczy Krajowego Rejestru Sądowego

Kapitał zakładowy 184.913.610 zł (wpłacony w całości)

KRS 27471, NIP 5250000564

[info@tzf.pl](mailto:info@tzf.pl)



+48 (22) 510 80 01



[www.tzf.pl](http://www.tzf.pl)



ul. A. Fleminga 2, 03-176 Warszawa



GDPR Article 6(1)(f) in order to pursue the Data Controller's legitimate interests	<ul style="list-style-type: none"> <li>a) for contact and identity verification purposes</li> <li>b) establishment, assertion and defense by the Data Controller against claims concerning property or non-property rights, or protection against claims brought against the Data Controller, in accordance with applicable regulations, as well as for archival (evidential) purposes.</li> </ul>
--	--

4. Personal data of Shareholders will be made available to entities providing legal and auditing services for the Company, with which the Company will have agreements on entrusting personal data processing. The data shall also be made available to other Shareholders by placing a list of shareholders authorised to attend the General Meeting on display at the Company's registered office. Personal data of Shareholders may also be made available to the entity which keeps the register of shareholders if an entry in the register is made at the Data Controller's request. Furthermore, the data may be made available to public administration bodies or courts of law if the Data Controller is obliged to do so pursuant to generally applicable laws. Shareholders' personal data may also be made available to IT and hosting service providers, as well as courier companies or to the Polish Post.
5. Your personal data will not be transferred to any third countries or international organisations.
6. Personal data shall be processed for a period arising from generally applicable laws or until the Company's legal existence ends, to the extent and within the time limits specified by statute, including by regulations concerning the retention of the Company's documentation (in particular concerning its shareholders).
7. As regards Shareholders who have personally delivered personal data to the Data Controller, we would like to point out that the provision of personal data is required in order to exercise the rights vested in the Shareholders in connection with the shares they hold and in order for the Data Controller to comply with the obligations arising from generally applicable laws.
8. If personal data of Shareholders have not been provided to the Data Controller in person, they have been made available by the entity which keeps the register of shareholders under an agreement with the Data Controller. The personal data that have been made available to the Data Controller are specified in point 4 of this clause.
9. The Shareholder shall have the following rights:
  10. right to access their personal data and receive their copies.
  11. right to rectification (correction) of their data;
  12. right to obtain restriction of processing of personal data,
  13. right to file an objection to the processing of personal data
  14. right to data portability, i.e. to receive from the Company the personal data in a structured, commonly used and machine-readable IT format. You may transmit the data to another data controller or request that the Company transmit the data to another data controller. However, the Company will only do so if such transmission is technically feasible. The right to personal data portability only applies to those data processed under agreement.
15. You have the right to file a complaint with a supervisory authority if the processing of the Contractor's personal data violates the provisions of the GDPR.
16. The scope of each of the above rights and the cases in which it is possible to exercise them is based on the applicable laws. Your rights depend on, among other things, the legal basis for the Data Controller's use of your data and the purpose of their processing.

This document was last updated on 15 October 2025.



#### Tarchomińskie Zakłady Farmaceutyczne „Polfa” S.A.

Sąd Rejonowy dla m.st. Warszawy w Warszawie  
 XIV Wydział Gospodarczy Krajowego Rejestru Sądowego  
 Kapitał zakładowy 184.913.610 zł (wpłacony w całości)

KRS 27471, NIP 5250000564

info@tzf.pl   
 +48 (22) 510 80 01   
 www.tzf.pl   
 ul. A. Fleminga 2, 03-176 Warszawa 