

Information Clause

for Shareholders and Proxies of Shareholders of Caspar Asset Management S.A.

1. Caspar Asset Management S.A., with its registered office in Poznań (61-888) at ul. Półwiejska 32 (hereinafter: "Caspar AM" or "Administrator"), in order to fulfill the information obligation referred to in Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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"), informs that it is the Administrator of the personal data of:
 - a) Shareholders of Caspar AM who are natural persons, and
 - b) Proxies of shareholders who are natural persons,who are entitled to participate in the Ordinary General Meeting of Shareholders of Caspar AM scheduled for **June 27, 2024, at 12:00 PM** (hereinafter: "General Meeting"), and who have demonstrated their status as shareholders or proxies of shareholders, who have requested access to the list of shareholders entitled to participate in the General Meeting or the list of shareholders present at the General Meeting, have submitted a request for copies of motions on matters included in the agenda of the General Meeting, have submitted a request to convene the General Meeting, have submitted a motion to include matters in the agenda of the convened General Meeting, or have submitted a draft resolution of the General Meeting (hereinafter collectively: "Shareholders"). The Administrator can be contacted at +61 855 44 44.
2. The Administrator informs that a Data Protection Officer has been appointed. To contact the Data Protection Officer, please send a message to the email address: **iodo@casparam.pl** or by mail to:

Inspektor Ochrony Danych
Caspar Asset Management S.A.
ul. Półwiejska 32, 61-888 Poznań
3. Shareholders' personal data are obtained from the National Depository for Securities S.A. based in Warsaw and from the Shareholders themselves, proxies, in particular in connection with the necessity to demonstrate the status of a shareholder, holding an appropriate number of shares, voting rights, or the right to represent a shareholder.
4. The scope of processed personal data includes data in the form of name and surname, residential address, email address, PESEL number or data regarding an identity document, and image (in the case of General Meeting transmission).
5. Shareholders' personal data are processed for the purpose of conducting the General Meeting, including fulfilling the obligation to make the list of shareholders available to Shareholders upon their request.
6. The legal basis for processing Shareholders' data for the above purpose is:
 - a) Fulfilment of legal obligations (Article 6(1)(c) GDPR), related to Article 407 § 11 of the Commercial Companies Code and Article 70(2) of the Act of July 29, 2005, on public offerings and the conditions for introducing

- financial instruments to the organized trading system and on public companies (concerning the list of shareholders);
- b) The legitimate interest of Caspar AM (Article 6(1)(f) GDPR) – related to enabling contact with Shareholders/proxies, verifying their identity, and potentially pursuing or defending claims.
7. Shareholders' data may be disclosed by Caspar AM to entities cooperating with it, in particular entities providing services in connection with the fulfillment of obligations related to conducting the General Meeting, entities providing IT services, Shareholders who request access to the list of Shareholders, request a copy of such list, or request that the list be sent by email, as well as members of the Administrator's statutory bodies.
8. Shareholders' personal data will not be processed in an automated manner and will not be subject to profiling.
9. Shareholders' personal data will be stored for the period necessary to achieve the purpose referred to in point 5, after which for the period necessary to fulfill the Administrator's obligations provided by law, and in the case of challenging resolutions of the General Meeting until the final conclusion of court proceedings in this regard.
10. Shareholders have rights related to the processing of personal data:
- a) The right to access their data – the right to obtain information on what data is processed and the right to receive a copy of such data;
 - b) The right to rectify data – the right to request immediate rectification of incorrect data or supplementation of incomplete data;
 - c) The right to delete data (right to be forgotten) – the right to request the deletion of data when it is no longer necessary to achieve the purpose for which it was collected or when it was processed unlawfully or contrary to GDPR or other laws;
 - d) The right to restrict processing;
 - e) The right to data portability, i.e., the right to receive personal data from Caspar AM in a structured, commonly used, machine-readable format. Shareholders can transfer this data to another data controller or request that Caspar AM transfers the data to another controller. However, Caspar AM will do so only if such transfer is technically possible. The right to data portability applies only to data processed based on a contract. This right cannot adversely affect the rights and freedoms of others;
 - f) The right to object to processing – in cases where Caspar AM processes personal data based on its legitimate interest; the objection can be expressed due to a particular situation to the email address: iodo@casparam.pl or the address of Caspar AM's headquarters with the note "Data Protection Officer."
11. Shareholders have the right to lodge a complaint with the President of the Office for Personal Data Protection if they believe that the Administrator violates regulations related to personal data protection. The Office for Personal Data Protection can be contacted by mail at ul. Stawki 2, 00-193 Warsaw, or via the electronic submission box available at: <https://www.uodo.gov.pl/pl/p/kontakt>.

12. The obligation to provide data for purposes related to the exercise of Shareholders' rights and obligations results from the law. In other cases, providing data is voluntary. The consequence of not providing personal data may be the inability to obtain shareholder status and exercise the rights and obligations entitled to the shareholder.