

PLAY COMMUNICATIONS S.A.

INVESTOR PRIVACY NOTICE

We are **Play Communications S.A.**, a Luxembourg public company limited by shares (société anonyme), having its registered office at 4/6, rue du Fort Bourbon, L-1249 Luxembourg, registered with the Luxembourg Register of Commerce and Companies under number B 183.803 (“Play Communications”).

We are the parent company for **P4 Sp. z o.o.** with its registered office in Warsaw at ul. Taśmowa 7, 02-677 Warsaw, entered in the register of entrepreneurs kept by the Regional Court for the Capital City of Warsaw, 13th Commercial Division of the National Court Register under KRS number 0000217207, the share capital amounting to PLN 48,856,500.00, tax identification number 951-21-20-007.

By this communication, we want to make you aware that we hold personal data about you, explain why we hold it and let you know who you can contact if you have any questions.

Definitions

- “controller” means the entity that decides how and why personal data are processed
- “personal data” means information about any individual from which any individual is directly or indirectly identifiable
- “processing” means any operation or set of operations which is performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction
- “we/us” means Play Communications S.A.
- “GDPR” means the General Data Protection Regulation (697/2016/EU)

Data controller identity: We are the controller of your personal data described in this Notice.

Types of personal data: The primary personal data we may hold about you, your directors, officers, employees, intermediaries and/or beneficial owners includes **names, contact details such as telephone numbers, e-mail addresses and employer addresses, titles, position information, professional background and experience details**, including your relationship with us. We obtain this personal data from you and we may also obtain it from third party sources, such as governmental records, news and social media reports and databases of corporate information (publicly available and by subscription).

Purposes of personal data processing: We collect and process your personal data or that of your directors, officers, employees, intermediaries and/or beneficial owners, to:

- comply with our regulatory and legal obligations and maintain our contractual and compliance records (including our background screening, insider trading, market abuse and anti-bribery and corruption registers),
- manage the contractual relationship with you, e.g. facilitate the payment of dividends,

- communicate with you, e.g., share information and invitations for PLAY Communications conference calls and events,
- facilitate our investment and business development planning,
- protect our legitimate interests such as dispute resolution, record keeping, security and/or training purposes.

We will only use your personal data for the purposes for which we collected it. If we need to use your personal data for other purposes, we will notify you and we will explain the legal basis which allows us to do so. In certain limited circumstances, we may process your personal data without your knowledge, where this is required or permitted by law.

Legal basis for personal data processing: We hold and process your personal data on one of the following legal basis:

- performance of the contract between you and us (Article 6 section 2b of the GDPR),
- compliance with our legal / regulatory requirements (Article 6 section 2c of the GDPR),
- our legitimate interests connected to maintaining a contractual and business relationship with you (Article 6 section 2f of the GDPR).

Under agreements you may have entered into with us, you may have consented to our use of personal data provided to us in order for us to meet our contractual obligations to you and for us to meet certain legal requirements. Those consents will remain in place under the GDPR.

Recipients of personal data: To fulfil the above purposes, we may share your data with:

- our Play Communication S.A. affiliated entities,
- entities that process personal data on our behalf, e.g., our service providers who provide corporate, share registry, asset management, investment and similar services,
- our professional and legal advisors and auditors,
- applicable public, governmental, administrative or judicial entities,
- other parties involved in judicial/legal matters with us.

International transfers of personal data: At present your personal data is maintained by us within the EEA. As indicated above, we use service providers to undertake certain services relating to our investors, and these service providers may hold your personal data outside of the EEA. If this is the case, your personal data will continue to be adequately protected in accordance with the GDPR.

Retention periods: We will only process your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of keeping our corporate records regarding investors up to date and consistent with our regulatory requirements. We erase or anonymise personal data which we do not require any more for the indicated purposes and which we are not legally obliged to keep.

Data subject rights: Your rights under the GDPR include:

- the right of data portability (for us to help you move your data to someone else at your request),
- the right to object to the processing of your personal data,
- the right to request us to update, correct or erase your data or to restrict processing of your data,
- the right for you to review the personal data we hold,
- the right to withdraw your consent to the processing of your personal data, if we process your data on the basis of your consent,
- the right to lodge a complaint with a data protection supervisory authority in the Member State where you live or work or where you feel a GDPR issue concerning you has arisen.

Other statutory or contractual information: Please note that your personal data is required to perform the contract we have entered into with you, to fulfil our legitimate interests or to meet our compliance obligations. We would not be able to meet these commitments if you did not provide us with your personal data described in this Notice.

We hope you will find this document useful. If you have any questions, concerns or you would like to exercise any of your rights, you should not hesitate to contact the General Counsel and Company Secretary at the registered office as set out above or at elona.ganaj@playcommunications.com.