

## INFORMATION ON PERSONAL DATA PROTECTION IN RELATION TO CONVENING THE GENERAL MEETING OF SHAREHOLDERS AT

### ARCTIC PAPER S.A.

Pursuant to Regulation (EC) No 2016/679 (GDPR) of the European Parliament and of the Council, Arctic Paper S.A. (the "Company") informs that in relation to convening General Meetings of Shareholders ("GM") in the Company, the Company will process personal data of the Company's Shareholders, proxies entitled to vote, and other persons authorised to the voting rights at the GM and personal data disclosed during the Meeting (jointly referred to as the "**Shareholders**").

In this connection, the Company represents that:

1. The personal data is controlled by Arctic Paper S.A. with its registered office in Poland, Fabryczna 1 street, 66-470 Kostrzyn nad Odrą; it is possible to contact the Company via the following e-mail address: [ir@arcticpaper.com](mailto:ir@arcticpaper.com) or by sending a letter to above mentioned correspondence address.
2. Any issues related to the protection of personal data at the Company may be discussed with the Data Protection Officer via the e-mail address of the Data Protection Officer: **DPO@arcticpaper.com** or address for correspondence: Arctic Paper S.A., Poland, Fabryczna 1 street, 66-470 Kostrzyn nad Odrą.
3. The data is processed in order to meet the Company's obligations resulting from the provisions of the Code of Commercial Companies, imposed on the Company as a public company in relation to convening the GM, to enable the Shareholders to exercise their rights towards the Company and to find facts for the purposes of pursuing possible recovery claims by the Company or defending itself against claims.
4. The Company processes:
  - ✓ Shareholder identifying information, such as first name, second name, address of residence, e-mail address and PESEL, ID number,
  - ✓ proxies' details contained in power-of-attorneys,
  - ✓ data concerning shares and privileges resulting from them, such as: number of the shares, shares' type and numbers and number of votes attributed thereto.
5. Personal data of Shareholders may be collected by the Company from entities maintaining securities depository in Poland and in Sweden (KDPW and Euroclear Sweden AB) and from other Shareholders – in respect of providing data contained in power-of-attorneys.
6. The legal basis for processing of your personal data is:
  - ✓ point (c) of Article 6(1) of GDPR – the obligation resulting from the provisions of the Code of Commercial Companies concerning: drafting and keeping lists of shareholders and attendance list at the GM, enabling to vote by way of proxy and enabling the Shareholders to exercise their rights towards the Company (e.g. placing specific matters on the agenda);
  - ✓ point (f) of Article 6(1) of GDPR – legitimate interest of the Company of (i) allowing contact with Shareholders and verifying their identity and (ii) pursuing possible recovery claims or defending itself against claims.
7. Other Shareholders are also personal data recipients in respect of making available the list of shareholders pursuant to Article 407 of the Code of Commercial Companies;
8. Personal data contained on the lists of shareholders, attendance lists and power-of-attorneys are kept for a period indicated in the Code of Commercial Companies,

personal data related with an e-mail contact are kept for a period allowing the Company to demonstrate compliance with obligations resulting from the provisions of the Code of Commercial Companies and for a period of possible claims of the Company or against the Company;

9. In case of data transferred directly to the Company, the provision of data is required by the provisions of the Code of Commercial Companies and in order to allow for the verification of the Shareholder's identity, and failure to provide such data results in no possibility to take part in the GM.
10. Shareholders are entitled to access their personal data and to correct, transfer, delete, demand restricting processing and object to processing of personal data; it is worth remembering that these are not absolute rights and provisions provide for exceptions to their application.
11. Shareholders may lodge a complaint with President of the Data Protection Office if there are any irregularities concerning processing of your personal data.