

ATM Grupa Corporate Group information security

In the ATM Grupa Corporate Group, bearing in mind the key role of information and its protection, we make sure that our Contractors' data are properly processed and protected.

The principles of information security are applied regardless of the source of personal data, their purpose, scope of collection, manner of processing, or the period of processing.

Basic security principles for Contractors

In order to maintain the highest standards, we oblige our Contractors to apply the following principles:

- Comply in all activities with the applicable legal provisions on personal data protection, in particular with the confidentiality rules - Maintain an appropriate level of protection of personal data and information in the information systems used
- Comply with basic security rules: use appropriately strong passwords, lock the computer when leaving the desk, apply a clean screen and clean desk policy, protect documents containing personal information from unauthorised access
- Continuously raise employee awareness and promote good information security practices
- Responding promptly and effectively to incidents, information security events and weaknesses in the information security system.
- Reporting any irregularities detected in the processing of personal data without undue delay.

Principles of personal data protection

Below - in fulfilment of our duty to provide information under the law - we have set out the general principles which guide us.

The information collected below may be further detailed or amended by us in the context of fulfilling certain purposes for processing personal data - i.e. you may receive information from us relating to the specific purpose of data processing in question.

Protection of personal data

We have implemented Personal Data Protection Security Policies and IT System Management Instructions in the companies of the ATM Grupa Corporate Group.

The principles defined in the above documents shall apply to the data sets and all activities constituting the processing of personal data in relation to which a company from the ATM Grupa Corporate Group is the controller, as well as to data entrusted to the company for processing on the basis of an entrustment agreement or another legal instrument, and to personal data that have been disclosed to us.

Each employee and associate of the ATM Grupa Corporate Group shall be obliged to get acquainted with the aforementioned documents and to abide by the provisions contained therein.

These documents are available:

- > at www.helpdesk.atmgrupa.pl
- > at the head office of ATM Grupa Corporate Group

Administrator of the data

The administrator of your personal data, in relation to the conclusion and performance of the contract concluded with a company from the ATM Grupa Corporate Group, will be **separately, to the extent applicable, each company that is a party to the contract** (hereinafter: "the **Administrator**").

The details of the individual companies are set out in the table below.

TABLE CONTAINING DETAILED INFORMATION ON DATA ADMINISTRATORS FOR INDIVIDUAL COMPANIES OF THE ATM GROUP

Ordinal	Administrator's details	Administrator's contact details
1.	ATM Grupa S.A. KRS (Polish Company Register): 0000157203, NIP (taxpayer identification number) 897-10-08-712	Address of the registered office in Bielany Wrocławskie: Dwa Światy 1 55-040 Bielany Wrocławskie, Post Office: Kobierzyce tel: +48 71 776 47 00 Warsaw Office: Wał Miedzeszyński 384 03-994 Warszawa tel: +48 22 507 97 00 e-mail: ado@atmgrupa.pl
2.	ATM Inwestycje Sp. z o.o. KRS (Polish Company Register): 0000298851, NIP (taxpayer identification number): 1080004301	Dwa Światy 1 55-040 Bielany Wrocławskie, Post Office: Kobierzyce e-mail: ado@atminwestycje.pl
3.	ATM Studio Sp. z o.o. KRS (Polish Company Register): 0000334353, NIP (taxpayer identification number): 5213532462	Wał Miedzeszyński 384, 03-994 Warszawa e-mail: ado@atmstudio.eu
4.	ATM System Sp. z o.o. KRS (Polish Company Register): 0000024013, NIP (taxpayer identification number): 8991083065	Błękitna 3 55-040 Bielany Wrocławskie, Post Office Kobierzyce e-mail: ado@atmsystem.pl
5.	ATM Rozrywka Sp. z o.o. KRS (Polish Company Register): 0000872846, NIP (taxpayer identification number): 8961599338	Dwa Światy 1 55-040 Bielany Wrocławskie, Post Office Kobierzyce e-mail: telewizja@atmrozrywka.pl
6.	ATM Living Sp. z o.o. registered in the Swedish Business Register under number 5591457204	Drottninggatan 1D, 212 11, Skåne län (Sweden) e-mail: ado@atmgrupa.pl
7.	Studio A Sp. z o.o. KRS (Polish Company Register): 0000161757, NIP (taxpayer identification number): 5260039674	Biały Kamień 5 02-593 Warszawa e-mail: studioa@it.pl

8.	Production Services Poland Sp. z o.o. Sp. z o.o. KRS (Polish Company Register): 0000666051, NIP (taxpayer identification number): 5252701213	Wał Miedzeszyński 384, 03-994 Warszawa e-mail: ado@adforceone.eu
9.	FM Aldentro Sp. z o.o. KRS (Polish Company Register): 0000470942, NIP (taxpayer identification number): 8961534907	Wał Miedzeszyński 384, 03-994 Warszawa e-mail: ado@fmaldentro.pl
10.	BOOMBIT S.A. KRS (Polish Company Register): 0000740933, NIP (taxpayer identification number): 957-10-40-747	Zacna 2, 80-283 Gdańsk tel: +48 504 21 00 22 e-mail: contact@boombit.com
11.	Black Photon Sp. z o.o. KRS (Polish Company Register): 0000858031, NIP (taxpayer identification number): 5213903272	Stępińska 22/30, 00-739 Warszawa e-mail: ado@blackphoton.pl
12.	LUMINA Sp. z o.o. KRS (Polish Company Register): 0000635401, NIP (taxpayer identification number): 8982223934	Błękitna 3 55-040 Bielany Wrocławskie, Post Office Kobierzyce e-mail: ado@luminapark.pl

Purposes and periods of data processing

We process personal data mainly in the framework of ongoing contracts and for other related purposes arising from the cooperation between us and our Contractors.

If, in connection with the conclusion of a contract, we have been given access to the data of certain persons (e.g. your employees), this data will be used for ongoing contact for the purpose of fulfilling the contract and for other contractual purposes.

In the aforementioned cases, the length of the processing period is usually based on the period of performance of the obligations, the applicable law, the statute of limitations for claims or any other legitimate reason.

Recipients of data

We make every effort to ensure that the entities to which we share your data meet high standards of data protection, including the use of organisational and technical measures as required by the GDPR.

Personal data may be shared with entities in the ATM Grupa Corporate Group, the Issuer and other entities to which the Administrator and or the Issuer has transferred rights or licensed rights, referred to in the Agreement (if applicable), other entities processing the data on the basis of the personal data processing entrustment agreement concluded with the Administrator, as well as entities authorised to receive the data on the basis of legal regulations.

Transfer of personal data to third countries and international organisations

If, in connection with the performance of obligations under the concluded agreement, including the statement of consent for the use of the image, it is necessary to transfer personal data outside the European Economic Area, (hereinafter: EEA) (excluding any transfer to a country which is not a member of the EEA and which has been recognised by the European Commission as providing an adequate level of personal data protection in accordance with the relevant data protection legislation), the Administrator will ensure that an adequate level of personal data protection will be provided. Data Protection means all applicable laws, regulations and legislation that govern the processing of personal data (including the GDPR), and other legislation issued and in force in the future, including any guidance issued by regulatory authorities. The Controller will conclude any required contracts that are necessary to ensure compliance with such laws, including appropriate contracts with data processors, as well as any contracts necessary for the transfer of personal data to countries that may not provide an adequate level of protection for personal data.

Rights of data subjects

The ATM Group shall take special care to protect the interests of data subjects. We facilitate the exercise of the rights of each person whose personal data we process.

The person whose personal data we are processing has the following rights

- > the right to withdraw their consent to the processing of their personal data at any time, whereby the withdrawal of consent shall not affect the lawfulness of data processing prior to the withdrawal of consent
- > the right to access their personal data,
- > the right to rectify their personal data,
- > the right to erasure of their personal data (including the right to be forgotten),
- > the right to amend the scope of processing of their personal data,
- > the right to personal data portability,
- > the right to object to the processing of personal data,
- > the right not to be subject to decisions based solely on automated processing of personal data

If you consider that the processing of your personal data violates the law, you have the right to lodge a complaint to the supervisory authority competent for the processing of personal data (the President of the Office for Personal Data Protection).

Requirement to provide personal data

The provision of personal data is voluntary. When concluding a contract, the provision of personal data is a condition for the conclusion and performance of the contract. The consequence of failing to provide the data is the inability to establish cooperation with a company of the ATM Grupa Corporate Group.

The contracting party is obliged to provide the above information to persons appointed to contact and supervise the provisions of the contract concluded with the company of ATM Grupa Corporate Group.

If you have any questions regarding the protection of your personal data, we kindly ask you to contact us.