

ING Bank Śląski S.A. notice of personal data processing for shareholders, persons participating in the General Meeting or exercising rights to shares

I. Clarification of the names used and legal basis for notice.

We, the Bank – ING Bank Śląski Spółka Akcyjna with its headquarters in Katowice. Detailed information about the Bank, including the Bank's entry in the court register, its Tax Identification Number (NIP), and the address of the Polish Financial Supervision Authority (KNF), which is the supervisory authority, can be found at the bottom of each page hereof (the so-called footer) and at www.ing.pl.

You, the Shareholder – a natural person whose personal data the Bank processes in relation to his/ her participation in the Bank's General Meeting or exercising his/ her rights to shares that are or will be issued by the Company. As used herein, the "Shareholder" is also a person who is a proxy or a statutory representative of a Shareholder or who represents the Shareholder or is otherwise authorized to exercise rights to the Bank's shares.

Legal basis

The notice is prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, OJ EU L.2016.119.1, of May 4, 2016. (hereinafter referred to as the Regulation).

II. Bank - the Data Controller for your personal data, contact details of the Bank and of the Data Protection Officer.

ING Bank Śląski S.A. is the controller of your personal data. The Bank operates its business, including the brokerage business in a separate Brokerage Office of ING Bank Śląski S.A., pursuant to its Charter. The Bank's registered office is located in Katowice, Poland, postal code 40-086, at ul. Sokolska 34, website: www.ing.pl, the Bank's email address: info@ing.pl, hotline (+48) 32 357 00 69. You may contact the Bank's Data Protection Officer by writing at the Bank's mailing address, preferably with an annotation "Data Protection Officer" or by email at: abi@ing.pl.

Other forms of contact may be listed at www.ing.pl.

III. Supervisory authority for personal data. The right to lodge a complaint with the supervisory authority.

The supervisory authority for personal data in Poland is the President of the Office for Personal Data Protection; address: ul. Stawki 2, 00-193 Warszawa. You have the right to lodge a complaint to the supervisory authority.

IV. Data sources and categories of data processed.

Data sources

We obtain data from you, legal entities or other entities you represent or who have designated you as a contact person, as well as from the National Depository for Securities (Krajowy Depozyt Papierów Wartościowych S.A., KDPW).

Categories of data processed

The Bank primarily processes data related to the identification or verification of rights to shares (securities issued by the Bank) and contact with shareholders. This is primarily data included in the list drawn up by the KDPW or other documents confirming the rights to shares (securities) regardless of the form in which they are drawn up, proxies, minutes, excerpts from the relevant registers or other documents related to the General Meeting or the exercise of Shareholders' rights to shares. Such data may include, in particular, name, address, PESEL number, ID/passport number, e-mail address and telephone number.

The Bank also processes audiovisual data. This is, for example, recordings related to securing property or assets and broadcasting the General Meeting on the Internet.

In addition, the Bank may process other personal data provided by the Shareholder, the Warsaw Stock Exchange (the Stock Exchange), the KDPW or any other authorized body or entity, as long as it cannot be qualified to any of the above groups and the processing takes place for the purposes described herein.

V. Purposes of processing personal data, legal basis for processing.

The Bank processes your personal data for the following purpose:

1. to fulfil the duties arising from the Community law (the law of the European Union) or from Polish law applicable to the Company or to the Bank as an issuer of securities, including but not limited to: the Commercial Companies Code, the provisions of the Act on Trading in Financial Instruments, the Act on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and Public Companies or any other provisions of the law binding on the Company that is a securities issuer, including:
 - making lists of Shareholders,
 - fulfilment of duties to keep records, reporting duties, including duties towards the KDPW, the Stock Exchange, the National Bank of Poland (NBP) or the KNF,
 - processing of requests of Shareholders or performance of other activities related to the Shareholders exercising their rights to shares issued by the Bank,
2. to exercise rights arising from the Bank's legitimate interests such as:
 - ensuring the security of persons and property, primarily related to the organization of General Meetings. This also refers to video surveillance - with preserving the privacy and dignity of natural persons,
 - asserting possible rights, including claims by the Bank or defending its rights or those of the entity the Bank represents,
 - transfer of data to archives,
 - audits or investigatory proceedings,

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- legal advice that is provided to the Bank.

VI. Transfer of data to other entities.

We may transfer personal data to entities or bodies:

1. that are authorized under the provisions of the law, including in particular the National Depository for Securities (KDPW),
2. of other Shareholders to perform obligations resulting from the provisions of the law, including the Commercial Companies Code,
3. if transmission of the data to them is necessary in order to perform a specific activity, e.g. a payment transaction to which the Shareholder is a party, or to perform any other activity related to the Shareholder,
4. which provide services to the Bank, in particular with regard to the preparation of the minutes of the General Meeting or providing technical support for the General Meeting, or
5. that are clearing houses or other entities in charge of settlements or clearing, payment institutions or schemes, or entities that represent such entities, provided it is in relation to an activity performed by or for the Shareholder.

VII. Transfer of data outside the European Economic Area.

The Bank may transfer data outside the European Economic Area (EEA) to countries for which the European Commission has declared an adequate level of protection. In addition, when data is transferred outside the European Economic Area (EEA) to countries for which there is no European Commission decision stating an adequate level of protection, the Bank shall apply appropriate safeguards in the form of:

- standard contractual clauses (standard data protection clauses) adopted by the European Commission, or
- with respect to the ING Group member companies, Binding Corporate Rules.

In connection with the transfer of data outside the EEA, you may request information on the relevant above-mentioned safeguards in this regard, obtain a copy of these safeguards or information on where they are available by contacting the Bank - contact details are described in point II of this notice. In addition, the Bank may transfer personal data to third countries (outside the EEA) that do not meet the relevant safeguards listed above only in cases provided by the provisions of the law or when you give your consent or the transfer is necessary to establish, assert or defend claims.

In the case of making settlements, the entities (institutions) competent for the recipient of a given transaction, to which we transfer data, may operate in Poland, countries of the European Economic Area (EEA). The Bank does not provide for the transfer of personal data outside the EEA, however, the Bank may, as part of the performance of a contract binding it, transfer such data if the Shareholder submits to the Bank a payment instruction to transfer the payment to a country outside this area. Accordingly for a given type of transaction, entities operating in Poland, in the European Economic Area or outside of it may be appropriate. These organizations operating outside Poland include the Society for Worldwide Interbank Financial Telecommunication (SWIFT), based in Belgium.

VIII. Know your rights in reference to the Bank.

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A shareholder has the right to:

1. request from the Bank access to personal data concerning him/her, and
2. have it rectified if it is inconsistent with the actual state of affairs, and moreover
3. in cases provided by law - to have it deleted or have data processing limited,
4. object to the processing of data; the objection will be processed by the Bank,
5. obtain a copy of the data - except that this right shall not adversely affect the rights and freedoms of other persons, including trade secrets or intellectual property. The first copy of the data is free of charge.

Requests for the exercise of rights may be submitted by the Shareholder electronically to info@ing.pl or in writing. Submission of such requests by telephone will be permitted, provided that the Bank, for the exercise of a given right, makes such a process available, taking into account the requirements for verification of the Shareholder's identity. The Bank may request clarification of the information or activities to which the request relates. Fulfilling the request to obtain its copy, the Bank shall provide it informing of the electronic format or carrier medium used.

Is the provision of data a statutory or contractual requirement

In the case of natural persons who are shareholders, shareholder representatives or shareholder proxies, the provision of personal data is necessary to establish entitlements to exercise rights to shares in reference to the Bank, including participation in the General Meeting.

IX. How long will the Bank process the data?

The Bank will process the data as long as a given person is a Shareholder. Furthermore, the Bank processes archive data upon the expiry of a given legal relationship for an archiving period not shorter than the statute of limitations period for claims. The general document archiving period is 6 years; the period ends upon the expiry of the last day of a calendar year, unless the provisions of the law provide for a different period. If there is a dispute, a court trial or any other proceedings (including in particular criminal proceedings) in progress, the archiving period will be counted from the date on which the dispute was concluded in a final and binding manner; in case of multiple proceedings, it will be counted from the ending date of the last proceeding, regardless of the way in which it was concluded.

The Bank's records, including records of General Meetings containing personal data are kept for the duration of the Bank's existence, and thereafter they may be transferred to the entity designated to store the documents.

X. Final Provisions.

This notice satisfies the legal obligation. No action is needed on your part.