

### INFORMATION ON PROCESSING PERSONAL DATA BY CD PROJEKT S.A.

Hello! This is **CD PROJEKT S.A.** We are the controller of personal data that we collect due to the organization of the General Meeting of Shareholders of CD PROJEKT S.A. ("**GMS**"). You will find our details in the header and the footer of this information.

#### Contact with us

If you have questions about your privacy, send an e-mail to our Data Protection Officer at: [dpo@cdprojektred.com](mailto:dpo@cdprojektred.com). You can also send a letter by traditional post to: CD PROJEKT S.A., ul. Jagiellońska 74, 03-301 Warszawa, adding "Attn: Data Protection Officer".

#### Who this information is for

This information is intended for the CD PROJEKT S.A. shareholders and their proxies.

#### Where we get your data

We have received some of your data from The Central Securities Depository of Poland (KDPW) because you are our shareholder. Other data we have obtained directly from you or the person you represent during your registration for the GMS.

#### What data we process

Shareholder	Proxy
first name, surname, mailing address, registered office, number of shares, number of votes per share, identity document data, e-mail address	First name, surname, identity document data, e-mail address, telephone number

#### How we use your data

Purpose	Legal grounds	Retention period
<ul style="list-style-type: none"> <li>conducting and enabling shareholders or their proxies to participate in the GMS</li> <li>performing tasks related to servicing natural persons holding shares of the Company</li> <li>drawing up and making available on request the list of shareholders entitled to participate in the GMS</li> <li>fulfilling obligations arising from the law including tax and accounting regulations</li> <li>documenting personal data processing</li> </ul>	legal obligation under: <b>art. 6.1.c of the GDPR</b> art. 406 <sup>3</sup> , 407 and 410 of the Polish Commercial Code	for the time necessary to hold the GMS, and afterwards – for the period required by the law or as long as needed to ensure accountability
<ul style="list-style-type: none"> <li>retaining documentation that indicates our rights and obligations</li> <li>purposes connected with asserting or defending claims, including managing court, arbitration or mediation proceedings</li> </ul>	legitimate interest (i.e. ensuring our legal security) <b>article 6.1.f. of the GDPR</b>	throughout the period our rights and/or obligations remain in effect; throughout the contract term, and afterwards - for the claim limitation period

#### Do you have to give us data?

If you want to attend the GMS you must provide us with this data. This is an obligation that arises from the regulations indicated in the table above.

## Your rights

Right	When you can exercise it
to access	in any situation
to rectify	where the data is incorrect or incomplete
to erase	<ul style="list-style-type: none"> <li>• where we no longer need the data in order to achieve the purposes for which we collected it</li> <li>• where you withdraw your consent based on which the data is processed</li> <li>• where you object to data processing</li> <li>• where we processed the data in contravention of the law</li> <li>• where we should delete the data in order to perform our legal obligation</li> </ul>
to restrict processing	<ul style="list-style-type: none"> <li>• where the data is incorrect – for a period enabling us to verify its correctness</li> <li>• where the data was processed in contravention of the law but you do not wish to have it deleted</li> <li>• where we do not need your data but you may need it to assert or defend claims</li> <li>• where you object to the processing of data – until it is determined whether our interest is superior to your objection grounds</li> </ul>
to transfer data	where data processing is based on consent or on a contract executed by us and it is automated
<b>to object</b>	<b>where we process your data based on a legitimate interest, and the objection is justified by your specific situation</b>
to lodge a complaint	you can always lodge a complaint with the President of the Personal Data Protection Authority ( <i>PUODO</i> ) or with the local data protection authority in your country

## Data recipients

We may make your data available to partners who support us in different processes connected with the organization of the GMS:

- the operators of the platform for holding an electronic General Meeting of Shareholders
- entities providing us with project management and content sharing tools
- auditors, actuaries, law firms, law & tax firms providing us with their services
- other shareholders who have the right to inspect the list of shareholders entitled to participate in the GMS
- if you are entitled to at least 5% of the votes at the GMS, your details may also be published in a current report of the Company or forwarded to the Financial Supervision Commission

Whenever obliged to do so, we will make your personal data available to courts and public administration authorities.

## Transferring data outside EEA

Your data may be processed, retained or transferred to our partners having their registered offices outside the European Economic Area. We assure the security of your data by transferring it to countries that ensure an appropriate security level or by applying EU standard contractual clauses.

## Automated processing and profiling

We will not use automated decision-making process, including profiling, based on your data. By profiling we mean drawing conclusions based on the data collected about you, for example with respect to your present or future preferences or interests.