

Information notice on personal data processing

in connection with the admission to operation on GPW and operation on GPW

In performance of our obligations pursuant to Articles 13 and 14 (1) and (2) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter "GDPR"), please be advised as follows:

The controller of your data is the Warsaw Stock Exchange (Giełda Papierów Wartościowych w Warszawie S.A., GPW), ul. Książęca 4, 00-498 Warsaw, Poland, phone +48 22 628 32 32, gpw@gpw.pl.

The controller has appointed a Data Protection Officer who can be contacted at iodgkgpw@gpw.pl.

Purposes, categories and scope, legal basis for processing of personal data

Purpose of processing	Categories of processed data	Scope of processed data	Legal basis
Admission to operation on the stock exchange and operation on the stock exchange	Representatives of Exchange Members: persons authorised to represent the entity applying for admission to operate/operating on GPW and other contact persons in connection with admission to operate on GPW and operation on GPW; persons authorised to take actions related to exchange trading (supervising brokers, exchange brokers)	Persons authorised to represent the entity – first name, surname, position and data included in the current extract from the relevant register or data included in the power of attorney and data of other contact persons: first name, surname, business e-mail address, business telephone number. Exchange brokers/supervising brokers: first name, surname, business e-mail address, business telephone number, position, exchange broker licence number (if applicable).	Article 6(1)(c) GDPR compliance with legal obligations in connection with admission to operation and operation on GPW Articles 18 and 31 of the Act on Trading in Financial Instruments; § 8 of the Regulation of the Minister of Finance on detailed conditions to be met by a regulated market (...) Article 6(1)(f) GDPR - verification of the correct representation of the entity in connection with the declaration of intent, the establishment, exercise or defence of potential claims.
Use of access to Exchange information systems (trading system, exchange information system)	Authorised persons: exchange brokers and supervising brokers, clients of exchange members using sponsored access or direct access, persons authorised by exchange members to handle the agreement for access to Exchange IT systems	Exchange brokers/supervising brokers: first name, surname, business e-mail address, business telephone number, position, exchange broker licence number (if applicable). Clients of exchange members: short codes. Persons authorised by exchange members: first name, surname, business e-mail address, business telephone number, position (if available).	Article 6(1)(f) GDPR – performance of an agreement with an entity for access to the Exchange IT system Article 6(1)(c) GDPR compliance with legal obligations under § 9, § 10 and § 11 of the Regulation of the Minister of Finance on detailed conditions to be met by a regulated market (...) and obligations under MiFIR and Commission Delegated Regulations (EU) regarding regulatory technical standards issued under MIFID II/MIFIR and MAR - Regulation No 596/2014
Use of access to the 4brokernet system (information exchange with exchange members)	Supervising brokers and other persons authorised by exchange members	Login data: first name, surname, email address and telephone number	Article 6(1)(f) GDPR – performance of an agreement with an exchange member for access to the 4Brokernet system for communication and information exchange

Accepting, modifying and cancelling broker's orders	Exchange brokers, clients of exchange members for whose account an exchange order is transmitted, clients using direct electronic access	Short code	Article 6(1)(c) GDPR - compliance with legal obligations under § 9, § 10 and § 11 of the Regulation of the Minister of Finance on detailed conditions to be met by a regulated market (...) and obligations under MiFIR and Commission Delegated Regulations (EU) regarding regulatory technical standards issued under MIFID II/MiFIR and MAR - Regulation No 596/2014
Monitoring of trading participants to identify cases of suspected market manipulation or insider dealing	Clients of exchange members for whose account an exchange order is transmitted Persons at an exchange member or trading participant who are responsible for making an investment decision, responsible for the execution of a transaction	Short code, long code: national identifier of the person (e.g., PESEL number, LEI), GPW_ID (coded identifier of the person)	Article 6(1)(c) GDPR - compliance with legal obligations under Article 25(2) of Regulation No. 600/2014, § 9 of the Regulation of the Minister of Finance on detailed conditions to be met by a regulated market (...) and obligations under MiFIR and Commission Delegated Regulations (EU) regarding regulatory technical standards issued under MIFID II/MiFIR and MAR - Regulation No 596/2014
Recording of orders and transactions Reporting of transactions	Clients of exchange members for whose account an order is transmitted Persons at an exchange member or trading participant who are responsible for making an investment decision, responsible for the execution of a transaction	Short code, long code: national identifier of the person (e.g., PESEL number, LEI)	Article 6(1)(c) GDPR - compliance with legal obligations under Article 25(2) of Regulation No. 600/2014, § 9, § 10 and § 11 of the Regulation of the Minister of Finance on detailed conditions to be met by a regulated market (...) and obligations under MiFIR and Commission Delegated Regulations (EU) regarding regulatory technical standards issued under MIFID II/MiFIR and MAR - Regulation No 596/2014
Statistics	Clients of exchange members on whose behalf the exchange members place an order	Short code, long code:	Article 6(1)(c) GDPR - exercise of rights under Article 29d of the Act on Trading in Financial Instruments
Due diligence/conducting inspections of exchange members	Persons authorised to represent exchange members and employees of exchange members	First name, surname, position, e-mail address, telephone number, data from a current excerpt from a relevant register or data contained in a power of attorney (in the case of authorised representatives)	Article 6(1)(c) GDPR - compliance with legal obligations under Regulation 2017/584

Conducting training for supervising broker candidates and examinations for supervising brokers	Supervising broker candidates	First name, surname, exchange broker's license number (if required), e-mail address, contact telephone number, mailing address (residence and place of employment in case of individual applications), examination recording (in case of remote examinations)	Article 6(1)(c) GDPR - compliance with legal obligations under § 8 of the Regulation of the Minister of Finance on detailed conditions to be met by a regulated market (...) Article 6(1)(b) GDPR – conducting training and examinations Article 6(1)(f) GDPR - maintaining contact with and identifying supervising brokers [Resolution No. 342/2006 of the Exchange Management Board, as amended; Resolution No. 396/2020 of the Exchange Management Board]
Maintaining a list of supervising brokers	Supervising brokers Persons authorised to represent the entity	First name, surname, licence number, date of birth, in the case of persons authorised to represent the entity - first name, surname, position and data from the current extract from the relevant register or data contained in the power of attorney	Article 6(1)(c) GDPR - compliance with legal obligations under § 8 of the Regulation of the Minister of Finance on detailed conditions to be met by a regulated market (...)
Recording telephone calls	Employees of exchange members	Recording of the call, the telephone number from which the call is being made	Article 6(1)(f) GDPR – communication for the purpose of handling exchange members' requests relating to trading sessions
Contacts	Representatives and contact persons of exchange members or exchange members' clients	First name, surname, position, business e-mail address, business telephone number, and data from the current extract from the relevant register or data contained in the power of attorney	Article 6(1)(f) GDPR - communication in connection with the conclusion or performance of an agreement and maintaining and developing the business relationship, answering questions

Recipients of personal data

Data may be transmitted to personal data processors engaged by GPW in connection with services provided to GPW, e.g., advisory, audit, IT services.

To the extent of the clearing of exchange trade, data are transmitted to Krajowy Depozyt Papierów Wartościowych S.A. GPW may transmit personal data to public authorities if required by applicable law. Personal data may also be transmitted in case of suspicion of criminal offence or fraud, in which case GPW may transmit the data to a supervisory authority.

Data retention period

The data retention period depends on the purpose of the processing. GPW will process personal data for as long as required for the purpose of processing in question and in accordance with the applicable retention periods required by the relevant legislation.

Rights of data subjects

Every person has, within the limits of the law, the right to access their personal data, the right to rectification, erasure, restriction of processing, the right to data portability, and the right to object to the processing of their personal data on the basis of legitimate interests of the controller.

Where personal data are processed on the basis of consent, every person has the right to withdraw consent without affecting the lawfulness of processing based on consent before its withdrawal.

Every person has the right to lodge a complaint concerning data processing with the President of the Personal Data Protection Office.

Data sources

Personal data may be sourced directly from data subjects, from an exchange member or exchange member's client, and from a party to an agreement concluded with GPW.

The applicant declares that he/she/it has read the information notice concerning processing of personal data by the Warsaw Stock Exchange (GPW) and undertakes to provide the notice to persons whose data he/she/it discloses to GPW in connection with the procedure for admission to operation on GPW and subsequent operation on GPW.