

# Complaints Handling Procedure

## Table of Contents

1. DEFINITIONS AND ABBREVIATIONS .....	2
2. GENERAL PROVISIONS.....	2
3. SUBMISSION OF COMPLAINTS .....	2
4. HANDLING COMPLAINTS.....	3
5. COMPLAINTS RECEIVED FROM PUBLIC ADMINISTRATION AUTHORITIES .....	5
6. MAINTENANCE OF THE COMPLAINTS REGISTER AND COMPLIANCE COMPLAINTS REGISTER .....	5
7. INFORMATION SECURITY .....	6
8. APPENDICES .....	7

## 1. Definitions and Abbreviations

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**DCO** – Compliance Department.

**Business Unit** – the organizational unit responsible for handling a complaint.

**GPW** – Giełda Papierów Wartościowych w Warszawie S.A. (Warsaw Stock Exchange S.A.).

**Registry Office** – GPW Registry Office.

**Information Letter** – correspondence addressed to GPW that does not constitute a Complaint and is in the nature of an inquiry, request for information, opinion, suggestion for change, or general comment, and does not contain an allegation of wrongdoing by GPW or a claim for compensation.

**Procedure** – Complaints Handling Procedure of Giełda Papierów Wartościowych w Warszawie S.A.

**Complaints Register** – the electronic register of Complaints maintained by DCO in accordance with the template set out in Appendix 3 to this Procedure.

**Compliance Complaints Register** – the electronic register of Compliance Complaints maintained by DCO in accordance with the template set out in Appendix 4 to this Procedure.

**Complaint** – collectively, a Complaint and a Compliance Complaint.

**Compliance Complaint** – an allegation raised by a market participant against GPW, relating in particular to activities associated with market organization. A Compliance Complaint may concern, among other things, GPW's failure to perform, neglect in performing, or improper performance of its duties.

**Complaint** – an allegation concerning the activities of other entities participating in exchange trading that does not relate to GPW's activities connected with market organization, in particular allegations concerning companies listed on GPW, investment firms, or Authorised Advisers.

**System** – the electronic document workflow system.

**Public Administration Authority** – ministers, central government administration bodies, voivodes, and other local government administration authorities acting on their behalf or in their own name.

## 2. General Provisions

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### 2.1

This Procedure establishes the rules for handling complaints at GPW.

### 2.2

GPW makes every effort to ensure that complaints are handled diligently, fairly, promptly, confidentially, and in accordance with the best knowledge and expertise of its employees.

## 3. Submission of Complaints

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### 3.1

Complaints and Compliance Complaints may be submitted as follows:

- a. **In writing** – in person at GPW's registered office or by post or courier to:

**Giełda Papierów Wartościowych w Warszawie S.A.**

ul. Książęca 4

00-498 Warsaw

Poland

- b. **Electronically** – using the complaint form available on the GPW website:

<https://www.gpw.pl/skargi>

### **3.2**

The form referred to in Section 3.1(b) should include:

- a. details of the complainant (full name or company name and email address);
- b. the entity concerned by the complaint (GPW / GPW-listed company / investment firm / Authorised Adviser / other market participant);
- c. a detailed description of the incident, including the alleged misconduct by GPW or another market participant, identifying, where possible, the persons involved, date, time, place, circumstances, persons possessing relevant information, and regulations allegedly breached;
- d. optionally, documents supporting the allegation of improper conduct by GPW or another market participant.

### **3.3**

The complaint form template is attached as Appendix 1 to this Procedure.

### **3.4**

Upon receipt of a complaint submitted in accordance with Section 3.1, the Registry Office:

- a. registers the complaint in the System;
- b. assigns the complaint in accordance with the applicable workflow.

### **3.5**

For complaints submitted via the electronic form referred to in Section 3.1(b), an automatic acknowledgement message containing the text set out in Appendix 2 shall be sent to the sender.

### **3.6**

Where correspondence:

- a. is anonymous;
- b. originates from a non-personalized email address and is unsigned; or
- c. contains threats, offensive language, or attempts at intimidation,

the Registry Office shall register the message in the System and assign it according to the relevant workflow. As a rule, no response will be provided to such correspondence.

### **3.7**

Correspondence sent to GPW for information only (cc) shall be registered in the System but, as a rule, shall not be processed.

### **3.8**

Where a complaint within the meaning of this Procedure is forwarded to GPW by its original recipient rather than submitted directly to GPW, the correspondence shall be transferred to the Registry Office and assigned in accordance with the applicable workflow.

### **3.9**

Where a complaint is submitted by email or any other method not specified in Section 3.1, the recipient of the message shall inform the sender that official submission requires either completion of the designated form or submission of written correspondence in accordance with Section 3.1.

## **4. Handling Complaints**

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### **4.1**

Complaints shall be reviewed and responded to by the relevant Business Unit to which the complaint has been assigned through the System.

**4.2**

The Director of the relevant Business Unit shall determine how the complaint will be handled and designate the person responsible for managing the complaint review process.

**4.3**

The person responsible for the matter shall indicate in the System (in the Comment field) how the complaint was handled (written response, telephone contact, or other method).

**4.4**

The System records shall include:

- a. the name of the complainant or entity submitting the complaint;
- b. the subject matter of the complaint;
- c. the date of receipt of the complaint (the date on which the complaint is received by GPW);
- d. the name of the organizational unit responsible for handling the complaint;
- e. organizational units notified of the complaint;
- f. where applicable, the method of handling the complaint.

**4.5**

Responses shall be provided using the same communication channel through which the complaint was submitted, unless the complainant requests otherwise.

Responses to complaints submitted through the electronic form shall be sent to the email address provided in the form.

All responses shall be registered in the System.

In the case referred to in Section 3.8, the response shall be sent only to the original complainant.

**4.6**

The relevant Business Unit shall register the response in the System.

**4.7**

Where a decision is made not to respond, the Business Unit shall record the justification for that decision in the System.

**4.8**

The registration, approval, and dispatch of responses shall follow the same process as outgoing correspondence within the System.

**4.9**

Where a complaint is handled using a method other than written correspondence, the responsible person shall enter a brief note in the System describing how the complaint was handled.

**4.10**

Complaints shall be handled without undue delay and no later than 30 days from the date of receipt by GPW.

**4.11**

The Business Unit handling the complaint may request additional information from the complainant if necessary. In such cases, the review period shall run from the date the requested information is received.

**4.12**

If a complaint cannot be resolved within 30 days, the Business Unit shall notify the complainant of the delay before the expiry of that period.

## **5. Complaints Received from Public Administration Authorities**

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### **5.1**

Complaints forwarded to GPW by a Public Administration Authority shall be processed in accordance with Section 4, subject to the provisions below.

### **5.2**

Upon completion of the review process, the Business Unit handling the complaint shall inform the Public Administration Authority of the outcome.

### **5.3**

Where a Public Administration Authority forwards a complaint without disclosing the complainant's personal details and indicates that such information remains in its possession, the response shall be transmitted to the complainant through that Authority.

## **6. Maintenance of the Complaints Register and Compliance Complaints Register**

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### **6.1**

DCO maintains the Complaints Register and the Compliance Complaints Register. Templates are provided in Appendices 3 and 4 respectively.

### **6.2**

Upon receiving information that a complaint has been submitted, DCO shall register it in the appropriate register.

### **6.3**

Information Letters shall not be recorded in either register.

### **6.4**

The Complaints Register shall contain:

- a. the complainant's name or company name;
- b. the date the complaint was submitted;
- c. the subject matter of the complaint;
- d. the date of response;
- e. the organizational unit or person providing the response;
- f. measures taken to investigate the complaint;
- g. any financial consequences for GPW;
- h. information as to whether the complaint was justified and upheld by GPW.

### **6.5**

The Compliance Complaints Register shall contain the information listed above together with an indication that the matter constitutes a Compliance Complaint.

### **6.6**

DCO shall verify whether complaints are handled in accordance with this Procedure.

If, after 30 days from receipt of a complaint, neither a response nor a justification for not responding has been registered in the System, DCO shall request clarification from the relevant Business Unit. The information received shall be recorded in the register.

## **7. Information Security**

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### **7.1**

GPW ensures the protection of personal data throughout the process of reporting, reviewing, and monitoring complaints.

### **7.2**

As the data controller, GPW exercises particular care to protect the interests of complainants and applies appropriate technical and organizational measures to protect personal data, especially against unauthorized access.

### **7.3**

The rules governing information classification, copying, storage, transmission, and disclosure are set out in the GPW Information Security Policy.

## 8. Appendices

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### Appendix 1 Complaint Form

#### Complainant Details

(Full name or company name and email address)

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#### Entity Concerned by the Complaint

(select one)

- GPW
- GPW-listed company
- Investment firm
- Authorised Adviser
- Other market participant
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#### Detailed Description of the Incident

Please provide a detailed description of the alleged misconduct by the entity concerned, including the legal basis for the alleged breach where possible, as well as the persons involved, date, time, place, circumstances, and any persons who may possess relevant information.

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#### Supporting Documents

Documents indicating alleged misconduct by GPW or another market participant.

*(Optional attachment)*

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#### NOTICE

As a rule, no response will be provided to anonymous submissions, complaints originating from non-personalized email addresses, or correspondence containing threats, offensive language, or attempts at intimidation.

Throughout the process of reporting, reviewing, and monitoring complaints, GPW ensures the protection of personal data. As the data controller, GPW exercises particular care to protect the interests of complainants and applies appropriate technical and organizational measures to safeguard personal data, especially against unauthorized access.

The rules governing information classification, copying, storage, transmission, and disclosure are set out in the GPW Information Security Policy. Information owners are required to comply with the information protection requirements specified therein.

**I confirm that I have read and understood the above notice.**

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## **Information on the Processing of Personal Data by GPW**

*(pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR"))*

### **1. Data Controller**

Giełda Papierów Wartościowych w Warszawie S.A. (GPW)  
ul. Książęca 4  
00-498 Warsaw, Poland  
Tel.: +48 22 628 32 32  
Email: gpw@gpw.pl

### **2. Data Protection Officer**

Email: [iodgkgpw@gpw.pl](mailto:iodgkgpw@gpw.pl)

### **3. Purposes and Legal Basis of Processing**

Personal data are processed for the purposes of:

- receiving, reviewing, documenting, and responding to complaints;
- maintaining the Complaints Register;
- establishing, pursuing, or defending legal claims.

Legal basis:

- Article 6(1)(c) GDPR – compliance with a legal obligation;
- Article 6(1)(f) GDPR – GPW's legitimate interest in ensuring legal compliance and protecting its interests, including the establishment, exercise, or defence of legal claims.

### **4. Categories of Data**

- identification data;
- contact details;
- information contained in the complaint.

### **5. Sources of Personal Data**

Data may be obtained directly from the data subject or from other entities, including:

- supervisory authorities;
- the Polish Financial Supervision Authority Office;
- entities cooperating with GPW;
- other natural or legal persons submitting complaints.

### **6. Recipients of Personal Data**

Recipients may include entities processing personal data on behalf of GPW in connection with services provided to GPW, including advisory, audit, and IT service providers.

### **7. Data Retention Period**

Personal data shall be processed in the System and the Complaints Register for a period of five years from the first day of the year following the year in which the complaint was received, and thereafter for the period necessary to establish, pursue, or defend legal claims.

### **8. Rights of Data Subjects**

Data subjects have the right to:

- access their personal data;
- rectify personal data;
- erase personal data;
- restrict processing;
- object to processing;
- data portability;
- lodge a complaint with the President of the Personal Data Protection Office.

### **9. Obligation to Provide Personal Data**

Providing personal data is necessary for the handling of a complaint, responding to it, and maintaining the Complaints Register. Failure to provide contact details may make it impossible for GPW to respond to the complaint.

## Complaints Handling Procedure