Information clause for shareholders of ManyDev Studio SE who are natural persons and proxies of shareholders

- 1. ManyDev Studio SE with the registered office in Warsaw at 26 Bieniewicka Street, 01-632 Warsaw, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw, XII Commercial Department of the National Court Register under the number KRS: 0000734433, NIP: 5260300448, REGON: 0125941540 (hereinafter referred to as: MANYDEV STUDIO) informs that it is the administrator of personal data of shareholders of MANYDEV STUDIO, being natural persons, and proxies of shareholders, being natural persons, who are entitled to participate in the General Meeting, demonstrated their status as shareholders or proxies of shareholders who have requested access to the list of shareholders present at the General Meeting, have requested that the General Meeting be convened, have requested that matters be placed on the agenda of the convened General Meeting or have submitted a draft resolution of the General Meeting (hereinafter collectively: Shareholders).
- 2. Contact phone number for MANYDEV STUDIO : +48 22 390 57 97. To contact MANYDEV STUDIO by e-mail regarding personal data please use the following e-mail address: kontakt@manydevstudio.pl
- 3. Shareholders' personal data is obtained from the National Depository for Securities (Krajowy Depozyt Papierów Wartościowych S.A.) with its registered office in Warsaw and is sent by Shareholders, proxies and representatives in particular in connection with the need to prove a Shareholder's status, ownership of an appropriate number of shares, voting rights or the right to represent a Shareholder.
- 4. The Shareholders' personal data is processed for the purpose of conducting the General Meeting of MANYDEV STUDIO, including the obligation to provide Shareholders with a list of shareholders upon request.
- (5) The legal basis for the processing of Shareholders' data for the purpose indicated above is:
 (a) fulfilment of legal obligations (Article 6(1)(c) of the GDPR), related to Article 407 par 1(1) of the Commercial Companies Code, Article 70(1) of the Act on Public Offering and Conditions for Introducing Financial Instruments to Organised Trading and on Public Companies (regarding the list of Shareholders),

(b) the legitimate interest of MANYDEV STUDIO (Article 6(1)(f) of the GDPR) - in order to service, assert and defend in the event of the occurrence of mutual claims.

- 6. Shareholders' data may be disclosed by MANYDEV STUDIO to entities cooperating with it, in particular to entities providing services in the scope of fulfilling the obligations of conducting the General Meeting, including IT services, legal services and to shareholders who submit a request to view the list of shareholders, issue a copy of such list or send the list by e-mail.
- 7. Shareholders' data will be stored for a period of 5 (five) years from the date of the General Meeting of MANYDEV STUDIO for which they have been prepared and, in the event of a challenge to the resolutions of the General Meeting, until the legal proceedings in this regard have become final.
- 8. The Shareholder shall have the rights related to the processing of personal data:
- (a) the right of access to the content of their data,
- b) the right to rectify them,
- c) right to erasure or restriction of data processing,
- d) right to object to its processing.

9. The Shareholder shall have the right to lodge a complaint with the President of the Office for Personal Data Protection.