

INFORMATION CLAUSE
RODO AML/KYC

1. Who is the controller of your personal data?

CVI Dom Maklerski sp. z o.o., with its registered office in Warsaw (00-844), Plac Europejski 2, building C, KRS 0000424707, REGON 242949739, NIP 9542738238 (“CVI DM” or “we”) is the controller of your personal data processed in connection with conducting the AML/KYC assessment process.

We have appointed a Data Protection Officer, who can be contacted regarding any personal data matters via e-mail: dane.osobowe@cvi.pl, or in writing at the address indicated above, marked “Personal Data”.

2. How do we obtain your personal data? What data do we process?

We obtain personal data directly from you or from an entity you represent. For individuals representing counterparties or shareholders, we may also obtain data from the entity you represent, if that entity is a counterparty of CVI DM.

We also obtain data from publicly available registers (CEIDG, KRS, REGON or other state-maintained registers), the Central Register of Beneficial Owners (CRBR) or its equivalents in other jurisdictions, publicly available AML/KYC sanctions lists, specialised AML/KYC databases, or other legally accessible public sources, including social media.

Providing personal data is a legal obligation arising from AML and KYC regulations, including the Act of 1 March 2018 on Counteracting Money Laundering and Terrorist Financing and the Act of 13 April 2022 on Special Measures Counteracting the Support of Aggression Against Ukraine and Serving the Protection of National Security (non-official translations). Failure to provide such data results in the impossibility of establishing business relations with CVI DM, including the inability to conclude an agreement.

Where the provision of personal data does not arise from a legal obligation, it remains voluntary but necessary to enter into business relations with CVI DM. Failure to provide such data will prevent the establishment of such relations.

Your personal data may include the following categories: first name, surname, family name, parents’ names, gender, citizenship, PESEL, date of birth, place of birth, image/photograph, ID card or other identity document number, date of issuance and expiry of the identity document, residential address, business address, telephone number, e-mail address, tax identification number (NIP), tax residency,

job position, role/function performed, FATCA and CRS status, degree of kinship or relationship to a politically exposed person, and any other data provided by you.

3. For what purposes do we process your personal data?

We may process your personal data for the following purposes:

- a. to comply with CVI DM's legal obligations as the controller (Article 6(1)(c) GDPR), in particular:
 - identifying and assessing risks related to money laundering and terrorist financing within our operations, and applying legally required financial security measures, including monitoring business relations, and verifying your identity or the identity of the beneficial owner — as required by the Act of 1 March 2018 on Counteracting Money Laundering and Terrorist Financing and other AML regulations;
 - identifying and assessing risks related to sanctions imposed by various states on individuals and legal entities in connection with our business activities, and applying legally required security measures, including verification of sanctions lists and supervision of transactions - including under the Act of 13 April 2022 on Special Measures Counteracting the Support of Aggression Against Ukraine and Serving the Protection of National Security and other sanctions regulations;
 - fulfilling accounting, tax and other legal obligations applicable to brokerage houses - including the Act of 29 September 1994 on Accounting, and the Act of 29 July 2005 on Trading in Financial Instruments;
- b. to take steps at your request prior to entering into a contract, and subsequently to perform such contract (Article 6(1)(b) GDPR), including identifying you as a contracting party, concluding, performing, terminating or settling a contract;
- c. to pursue the legitimate interests of CVI DM as controller (Article 6(1)(f) GDPR), in particular:
 - establishing, exercising or defending legal claims (including litigation before courts or administrative authorities),
 - verifying our counterparties and persons seeking to establish business relations with us,
 - meeting our internal administrative purposes such as accountability, internal archiving, internal reporting and risk management.

Your personal data will also be used for profiling, i.e. assessing the risk of money laundering and terrorist financing — to fulfil our statutory AML/KYC obligations and CVI DM's legitimate interest in verifying potential counterparties. Processing will not be carried out without human involvement; in particular, no automated decisions producing legal effects concerning you will be taken solely on the basis of profiling.

Your data will not be transferred outside the European Economic Area. Should we decide or be legally required to carry out such a transfer, we will promptly notify you.

4. How long will we process your personal data?

Personal data, document copies and information obtained as part of financial security measures will be stored for 5 years from the termination of business relations with you or from the date of an occasional transaction. The General Inspector of Financial Information (GIFI) may require us to retain them for an additional period not exceeding 5 more years.

For data processed outside AML/KYC purposes, we store personal data for the period - whichever is later:

- necessary for proper performance of the contract (as a rule - the contract duration), followed by the limitation period for claims, not exceeding 3 years;
- the document retention period required under accounting and tax regulations, typically 5 years from the end of the year in which the tax obligation arose.

5. To whom may we disclose your personal data?

Personal data may be disclosed to entities affiliated with CVI DM, our business partners and counterparties, clients and potential clients, i.e. parties we cooperate with in offering or providing our services, as well as our subcontractors/service providers — including auditors, HR/payroll service providers, IT providers, identity verification service providers, legal advisers and tax advisers, and public authorities (including GIFI, the Polish Financial Supervision Authority, and the competent authority for the Central Register of Beneficial Owners).

6. What rights do you have in connection with our processing of your personal data?

You have the right to request access to your personal data, including obtaining a copy, rectification or supplementation of your data, erasure of data, restriction of processing, objection to processing, portability of your personal data.

If you believe that our actions infringe your rights, you may lodge a complaint with the President of the Personal Data Protection Office (Poland).

If you have any questions regarding the manner or scope of processing of your personal data, please contact us.