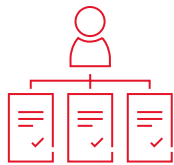


# Personal Data in the Amica Capital Group

We attach great importance to proper protection of information, including personal data. In particular, this concerns the data of our employees, clients and the customers who buy our appliances.



To this end we have established joint principles at the Amica Capital Group with regard to the security of information and personal data.

Appropriate information security is one of our priorities, as testified by the **Personal Data Security Policy**, established, which constitutes a superior document to the procedures implemented with regard to organisational, physical or IT security.

We operate not only within the EU, hence the principles we have adopted comply with GDPR as well as regulations which apply in other countries. **It is important for us that each company in the Amica Capital Group is guided by the same principles, regardless of where it does business.**

## Personal Data Security Policy

Out of concern for the security of our employees, colleagues, partners and everyone else connected with the Amica Capital Group, we apply principles which ensure the highest level of security. **For this reason we have implemented a Personal Data Security Policy for the Group, in order to better protect their privacy.**



The Personal Data Security Policy is a set of universal principles common to the entire Amica Capital Group. These are intended to protect data security in every area of its functioning.

The rules contained in the Personal Data Security Policy are detailed in internal documents adopted by the individual companies of the Amica Capital Group, and which are adapted to local legislation and business obligations.

## The Group DPI

**We have appointed a Group Data Protection Inspector.** The Inspector supervises personal data security procedures in companies of the Amica Capital Group, and is responsible for developing and implementing rules, and for issuing guidelines involving personal data.



**This function is currently held by Ms Anna Hoffmann, and contact with the Group DPI is possible by email to [gdpr@amica.com.pl](mailto:gdpr@amica.com.pl)**

The Group DPI is supported in her actions by persons assigned in the individual companies, namely personal data protection officers and coordinators.

**All the people responsible for personal data protection at the Amica Capital Group are subjected to rigorous vetting in terms of professional qualifications, particularly expert knowledge concerning law and practices in the field of data security.**

## Basic data processing principles

The policies and procedures established are aimed at fulfilling legal regulations, specifically guaranteeing the appropriate level of security. Appreciating the trust put in us by the people who provide us with their personal data, we have established a set of rules which all our employees are obliged to abide by. This concerns not only application of the appropriate IT security, but also implementation of appropriate organisational and physical safety measures.

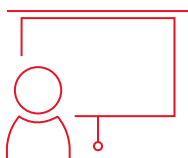


**Our Personal Data Security Policy obliges every company of the Amica Capital Group to ensure the highest standard of such protection in order to guarantee the confidentiality, accessibility and integrity of personal data.**

We attach particular importance to training our employees, because they are the ones responsible for applying the procedures we adopt. **With this in mind, each of our employees is trained in matters concerning personal data protection, with special emphasis on the training of new employees.**

## **Personal data incidents**

In order to manage personal data breaches and incidents, we have introduced a group-wide incident management procedure which defines the manner of reporting these and obtaining information about incidents, and the principles concerning investigative procedures.



**All employees of the Amica Capital Group have been trained in the content of the applicable procedure, and in particular they have been informed of the methods of reporting incidents.**

## **Anonymous reporting of breaches**

We have implemented a system enabling anonymous reporting of breaches, including those concerning personal data, via an external online platform. Reporting irregularities in this way can be conducted using the form available on the website: [report.whistleb.com/pl/amica](https://report.whistleb.com/pl/amica)

**We attach special attention to the protection of the personal data of persons, who report irregularities both anonymously as well as those who voluntarily share their personal details with us.**