

**Information notice on personal data processing
in connection with admission to operation on the markets operated by BondSpot S.A. and
operation on the markets operated by BondSpot S.A.**

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 BondSpot S.A. (BondSpot), ul. Książęca 4, 00-498 Warsaw, Poland, phone +48 22 537 74 00, bondspot@bondspot.pl

The controller has appointed a Data Protection Officer who can be contacted at: daneosobowe@bondspot.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 market and operation on the market	Representatives of Members and Participants: persons authorised to represent the entity applying for admission to operate/operating on the markets and other contact persons in connection with admission to operate on the markets and operation on the markets; persons authorised to take actions related to market trading (brokers, dealers)	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. Brokers and dealers: first name, surname, business e-mail address, business telephone number, position, securities broker licence number (if applicable), dealer ID.	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 BondSpot information systems: NSBS - Catalyst, TradeImpact – trading system provided by MTS – for the TBSP market CMF – cash market system, MMF – repo market system.	Authorised persons: brokers – Catalyst market dealers – TBSP market	Brokers: first name, surname, business e-mail address, business telephone number, position, securities broker licence number (if applicable). Dealers: first name, surname, business e-mail address, business telephone number, position (if available), dealer ID, short codes.	BondSpot Article 6(1)(f) GDPR – performance of an agreement with an entity for access to the BondSpot 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 4BondNet system - information exchange	Supervising brokers and dealers and other persons authorised by the member/participant/supervisor	Login data: first name, surname, email address and telephone number, position	Article 6(1)(f) GDPR – access of a member/participant to the 4BondNet system for communication and information exchange

Accepting, modifying and cancelling orders	Brokers and dealers	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	Brokers and dealers	Short code, long code (including PESEL), dealer 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	Brokers and dealers	First name and surname - NSBS, Short code, long code: dealer ID (coded identifier of the person) - TBSP	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
Due diligence/conducting inspections of members	Persons authorised to represent members/participants and employees of members/participants	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 brokers in the NSBS application	Candidates for Catalyst	First name, surname, securities broker license number (if required), e-mail address, contact telephone number, mailing address	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]
Recording telephone calls	Members, participants, issuers, contractors who initiate phone calls	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 requests of members, participants, issuers, contractors
Contacts	Representatives and contact persons of members/participants/ issuers	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 BondSpot in connection with services provided to BondSpot, 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.

BondSpot 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 BondSpot may transmit the data to a supervisory authority.

Data retention period

The data retention period depends on the purpose of the processing. BondSpot 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 a Member or Participant, and from a party to an agreement concluded with BondSpot.

Last update: 11.01.2022