



ten square games

## INFORMATION ABOUT THE PROCESSING OF CONTRACTOR'S PERSONAL DATA BY TEN SQUARE GAMES S.A. WITH ITS REGISTERED OFFICE IN WROCLAW

Pursuant to article 13(1-2) of the Regulation (EU) 2016/679 of European Parliament and 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 (the "GDPR") – we are informing that:

1. Ten Square Games S.A. with its registered office in Wrocław (postcode 50-416), 45 General Romualda Traugutta Street, entered into the Register of Entrepreneurs of the National Court Register by the District Court for Wrocław-Fabryczna in Wrocław, 6<sup>th</sup> Commercial Division of the National Court Register, entry no. 0000704863, NIP: 8982196752, REGON: 021744780 (hereinafter: "ADO") is the data controller.
2. The controller has appointed a Data Protection Officer(DPO) who can be contacted via email at [dpo@tensquaregames.com](mailto:dpo@tensquaregames.com).
3. Personal data are processed:
  - a) for the purpose of preparing the documentation necessary to conclude a cooperation agreement and to take action at the request of the data subject prior to concluding an agreement (Article 6(1)(b) of the GDPR);
  - b) after the conclusion of the cooperation agreement:
    - in order for the ADO to perform the cooperation agreement – to the extent to which personal data are necessary for the performance of the cooperation agreement (Article 6(1)(b) of the GDPR);
    - for the purpose of performing contracts concluded by the ADO, asserting or defending ADO's claims, fulfilling internal administrative purposes of the Ten Square Games S.A. capital group including, among others, to maintain a register of issued access cards, to secure access to the building and premises of the ADO for authorized persons, to ensure the possibility of verification of receipt and return of access cards, as well as to notify the building manager of the need to block the access card in case of, e.g., its damage, destruction or loss, and in addition for the purpose of managing the process of carrying out employee appraisals, activities related to the development of the employee's skills, managing qualification improvement processes, including the organisation of internal training and other forms of exchange of knowledge and experience within the organisation, and in consequence improving the quality of services and products offered by the ADO (Article 6(1)(f) of the GDPR);
    - in the remaining scope on the basis of consent to their processing (Article 6(1)(a) of the GDPR).
4. Providing personal data is voluntary, but necessary to conclude a cooperation agreement and its performance by ADO. Failure to provide the data shall result in the inability to conclude and implement a cooperation agreement.
5. Personal data may be transferred to entities related to, and cooperating with, the ADO, in particular to companies related by capital and personality to the ADO, accounting, legal, IT companies, entities providing services in the field of occupational health and safety, entities providing services in the field of raising professional qualifications, entities organizing training/professional events, if the Contractor participates in programmes aimed at raising qualifications/training/event, auditors or translators and authorities in accordance with applicable law (e.g: the Social Insurance Institution, the Tax Office, Sanitation Department, the National Labour Inspectorate, OHS Inspector, etc.).
6. Due to the scope of ADO's activities, the Contractor's personal data may be transferred to a third country, in particular in connection with the establishment by the ADO of commercial relations with entities located in third countries. Personal data are transferred to a third country either on the basis of a decision establishing an adequate level of protection (Article 45 of the GDPR) or subject to adequate safeguards (Article 46 the GDPR).
7. Personal data shall be processed for the period required by law or necessary for the performance of the contract and may be processed for the period necessary for the realization of ADO's legitimate interests. In the case of personal data processed on the basis of the Contractor's consent, it shall be stored until the purpose of the processing has been fulfilled, unless the Contractor withdraws consent for processing earlier.
8. Personal data shall not be processed automatically in IT systems and shall not be subject to profiling.
9. To the extent provided by law, the Contractor has the right to access personal data, to demand their rectification, erasure or restrict the processing and the right to transfer data, as well as the right to lodge a complaint to the supervisory authority, i.e. the President of the Personal Data Protection Office.
10. If personal data are processed pursuant to consent, the Contractor has the right to withdraw it in any way, at any time, which shall not affect the legality of the processing carried out on the basis of consent before its withdrawal.
11. If data are processed on the basis of the legitimate interest of the ADO, the Contractor has the right at any time to object to the processing of data on grounds related to their particular situation. In such a case, the ADO may no longer process such personal data, unless the ADO demonstrates the existence of valid legitimate grounds for the processing, overriding the interests, rights and freedoms of the Contractor or grounds for establishing, asserting or defending claims.
12. The ADO informs that the premises (common areas, lobby, lobby with elevators) where ADO offices are located are under video surveillance conducted by MVGM Property Management Poland sp. z o.o. with its registered office in Warsaw. The data from CCTV shall be retained by the building manager for a period of 30 days from the date of recording. All inquiries concerning CCTV are supposed to be directed to the following e-mail address: [n.glanowska@mvgm.com](mailto:n.glanowska@mvgm.com) or addressed to +48 883 360244.



**INFORMATION ABOUT THE PROCESSING OF CONTRACTED PARTY'S PERSONAL DATA BY TEN SQUARE GAMES S.A. WITH ITS REGISTERED OFFICE IN WROCLAW**

Pursuant to article 13(1-2) of the Regulation (EU) 2016/679 of European Parliament and 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 (the "GDPR") – we are informing that:

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2. The controller has appointed a Data Protection Officer(DPO) who can be contacted via email at dpo@tensquaregames.com.
3. Personal data are processed:
  - a) in order to prepare documentation necessary for employment on the basis of a specific work contract and in order to take action at the request of the data subject prior to concluding a contract (Article 6(1)(b) of the GDPR);
  - b) after concluding the specific work contract:
    - for the purpose of exercising ADO's rights and obligations arising from generally applicable laws, and in particular labour law, social security law, as well as tax law (Article 6(1)(c) of the GDPR);
    - for the purpose of performing a specific work contract by the ADO – insofar as the personal data are necessary for the performance of the specific work contract (Article 6(1)(b) of the GDPR);
    - for the purpose of performing contracts concluded by the ADO, asserting or defending ADO's claims, fulfilling internal administrative purposes of the Ten Square Games S.A. capital group including, among others, to maintain a register of issued access cards, to secure access to the building and premises of the ADO for authorized persons, to ensure the possibility of verification of receipt and return of access cards, as well as to notify the building manager of the need to block the access card in case of, e.g., its damage, destruction or loss, and in addition for the purpose of managing the process of carrying out appraisals of contractors, activities related to the development of the contractor's skills, managing qualification improvement processes, including the organisation of internal training and other forms of exchange of knowledge and experience within the organisation, and in consequence improving the quality of services and products offered by the ADO (Article 6(1)(f) of the GDPR);
    - in the remaining scope on the basis of consent to their processing (Article 6(1)(a) of the GDPR).
4. Provision of personal data is voluntary, but necessary in order to conclude a specific work contract and its performance by the ADO, as well as to exercise by the ADO rights and obligations arising, among others, from tax law. Failure to provide the data will result in the inability to conclude and perform the specific work contract and related obligations of the ADO, including tax obligations.
5. Personal data may be transferred to entities related to, and cooperating with, the ADO, in particular to companies related by capital and personality to ADO, accounting, legal, IT companies, entities providing services in the field of occupational health and safety, entities providing services in the field of raising professional qualifications, entities organizing training/professional events, if the Contractor participates in programmes aimed at raising qualifications/training/event, auditors or translators, competent tax authorities and other authorities in accordance with applicable law (e.g: Sanitation Department, the National Labour Inspectorate, OHS Inspector, etc.).
6. Due to the scope of ADO's activities, the Contracted Party's personal data may be transferred to a third country, in particular in connection with the establishment by the ADO of commercial relations with entities located in third countries. Personal data are transferred to a third country either on the basis of a decision establishing an adequate level of protection (Article 45 of the GDPR) or subject to adequate safeguards (Article 46 the GDPR).
7. Personal data shall be processed for the period required by law or necessary for the performance of the contract and may be processed for the period necessary for the realization of ADO's legitimate interests. In the case of personal data processed on the basis of the Contracted Party's consent, it shall be stored until the purpose of the processing has been fulfilled, unless the Contracted Party withdraws consent for processing earlier.
8. Personal data shall not be processed automatically in IT systems and shall not be subject to profiling.
9. To the extent provided by law, the Contracted Party has the right to access personal data, to demand their rectification, erasure or restrict the processing and the right to transfer data, as well as the right to lodge a complaint to the supervisory authority, i.e. the President of the Personal Data Protection Office.
10. If personal data are processed pursuant to consent, the Contracted Party has the right to withdraw it in any way, at any time, which shall not affect the legality of the processing carried out on the basis of consent before its withdrawal.
11. If data are processed on the basis of the legitimate interest of the ADO, the Contracted Party has the right at any time to object to the processing of data on grounds related to their particular situation. In such a case, the ADO may no longer process such personal data, unless the ADO demonstrates the existence of valid legitimate grounds for the processing, overriding the interests, rights and freedoms of the Contracted Party or grounds for establishing, asserting or defending claims.
12. The ADO informs that the premises (common areas, lobby, lobby with elevators) where ADO offices are located are under video surveillance conducted by MVGM Property Management Poland sp. z o.o. with its registered office in Warsaw. The data from CCTV shall be retained by the building manager for a period of 30 days from the date of recording. All inquiries regarding CCTV are supposed to be directed to the following e-mail address: n.glanowska@mvgm.com or to +48 883 360244.



## INFORMATION ABOUT THE PROCESSING OF EMPLOYEES' PERSONAL DATA BY TEN SQUARE GAMES S.A. WITH ITS REGISTERED OFFICE IN WROCLAW

Pursuant to article 13(1-2) of the Regulation (EU) 2016/679 of European Parliament and 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 (the "GDPR") – we are informing that:

1. Ten Square Games S.A. with its registered office in Wrocław (postcode 50-416), 45 General Romualda Traugutta Street, entered into the Register of Entrepreneurs of the National Court Register by the District Court for Wrocław-Fabryczna in Wrocław, 6<sup>th</sup> Commercial Division of the National Court Register, entry no. 0000704863, NIP: 8982196752, REGON: 021744780 (hereinafter: "ADO") is the data controller.
2. The controller has appointed a Data Protection Officer(DPO) who can be contacted via email at [dpo@tensquaregames.com](mailto:dpo@tensquaregames.com)
3. Personal data of employees are processed:
  - for the purpose of exercising ADO's rights and obligations arising from generally applicable laws, and in particular labour law, social security law, as well as tax law (Article 6(1)(c) of the GDPR);
  - for the purpose of performing contracts concluded by the ADO, asserting or defending ADO's claims, fulfilling internal administrative purposes of the Ten Square Games S.A. capital group including, among others:
    - to maintain a register of issued access cards, to secure access to the building and premises of the ADO for authorized persons, to ensure the possibility of verification of receipt and return of access cards, as well as to notify the building manager of the need to block the access card in case of, e.g., its damage, destruction or loss;
    - in addition for the purpose of managing the process of carrying out employee appraisals, activities related to the development of the employee's skills;
    - to manage qualification improvement processes, including the organisation of internal training and other forms of exchange of knowledge and experience within the organisation, researching the development history of career paths in individual departments of the company and the possibility of improving these paths, researching and monitoring the possibility of improving work in individual departments and positions in the company's structure, researching missing competencies and planning their implementation in the company, researching and comparing the development and operation of the business and ADO structure over time, estimating attrition risk in the company, and in consequence improving the quality of services and products offered by the ADO (Article 6(1)(f) of the GDPR);
  - in the remaining scope on the basis of consent to their processing (Article 6(1)(a) of the GDPR).
4. Personal data of special categories regarding health referred to in Article 9(1) of the GDPR shall be processed by the ADO:
  - on the basis of an explicit consent to their processing, given in a separate document, for the purposes specified in that document (Article 9(2)(a) of the GDPR);
  - if the processing is necessary for the purposes of prophylaxis or occupational medicine, to assess an employee's fitness for work, medical diagnosis, the provision of health care or social security, treatment or the management of health care or social security systems and services on the basis of applicable law or pursuant to a contract with a health professional (Article 9(2)(h) of the GDPR);
  - in order to comply with the obligations incumbent upon the ADO in connection with the employment of disabled persons, as well as in other cases where the processing of such data is necessary for the fulfilment of obligations and the exercise of specific rights by the controller or by the data subject in the field of labour law, social security and social protection (Article 9(2)(b) of the GDPR).
5. Providing personal data is a statutory requirement for exercising rights and obligations resulting from the employment relationship, and their non-transmission will result in the inability to perform the concluded contract of employment and related obligations, including tax and contribution obligations. Providing data in a wider scope than required by law is voluntary.
6. Personal data may be disclosed to entities related to and co-operating with the ADO, in particular to companies related by equity or personally with the ADO, accounting companies, law firms, IT companies, entities providing services in the area of occupational health and safety, entities providing services in the area of improving professional qualifications, entities organising training/professional events, if an employee participates in the improvement of qualifications/training/event, auditors or translators, competent tax authorities and the relevant branch of the Social Insurance Institution, and other authorities in accordance with applicable law (e.g: Sanitation Department, the National Labour Inspectorate, OHS Inspector, etc.).
7. Due to the scope of ADO's activities, employees' personal data may be transferred to a third country, in particular in connection with the establishment by the ADO of commercial relations with entities located in third countries. Personal data are transferred to a third country either on the basis of a decision establishing an adequate level of protection (Article 45 of the GDPR) or subject to adequate safeguards (Article 46 of the GDPR).
8. Personal data shall be processed for the period required by law or necessary for the performance of the agreement in accordance with applicable regulations, and may be processed for the period necessary for the realization of ADO's legitimate interests. In the case of personal data processed on the basis of an employee's consent, it is kept until the purpose of the processing has been fulfilled, unless the employee withdraws consent for processing beforehand.
9. Personal data shall not be processed automatically in IT systems and shall not be subject to profiling.
10. To the extent provided by law, employees have the right to access their personal data, to demand their rectification, erasure or restrict the processing, and the right to object to the processing and the right to transfer data, as well as the right to lodge a complaint to the supervisory authority, i.e. is the President of the Personal Data Protection Office.
11. If the basis for the processing of personal data is consent, the employee has the right to withdraw it in any way, at any time, which does not affect the legality of the processing carried out on the basis of consent before its withdrawal.
12. The ADO informs that the premises (common areas, lobby, lobby with elevators) where ADO offices are located are under video surveillance conducted by MVGM Property Management Poland sp. z o.o. with its registered office in Warsaw. The data from CCTV shall be retained by the building manager for a period of 30 days from the date of recording. All inquiries concerning CCTV are supposed to be directed to the following e-mail address: [n.glanowska@mvgm.com](mailto:n.glanowska@mvgm.com) or addressed to +48 883 360244.



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**INFORMATION ON THE PROCESSING OF PERSONAL DATA INTENDED FOR THE MEMBERS OF THE GOVERNING BODIES OF TEN SQUARE GAMES S.A. (THE MANAGEMENT BOARD MEMBERS, THE SUPERVISORY BOARD MEMBERS, HOLDERS OF A COMMERCIAL POWER OF ATTORNEY, ATTORNEYS-IN-FACT)**

In accordance with Article 13 para. 1-2 of the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of natural persons in regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 (general data protection regulation, hereinafter referred to as "GDPR") - we inform that:

1. The personal data controller is Ten Square Games S.A. with its registered seat in Wrocław (50-416), 45 Romualda Traugutta Street, entered in the register of entrepreneurs of the National Court Register maintained by the District Court for Wrocław-Fabryczna, VI Commercial Division of the National Court Register, under KRS number 0000704863, NIP: 8982196752, REGON 02174478000000 (hereinafter referred to as "the Controller")
2. The Controller has appointed a data protection officer who can be contacted via e-mail: [dpo@tensquaregames.com](mailto:dpo@tensquaregames.com)
3. Your personal data are processed:
  - a) in order to comply with legal obligations to which the Controller is subject, related to a corporate relationship between the Controller and the Management Board members, the Supervisory Board members, holders of a commercial power of attorney or attorneys-in-fact, in particular, in order to comply with obligations:
    - arising from the Commercial Companies Code,
    - arising from the Act on the National Court Register,
    - connected with the obligation to carry out financial settlements,
    - connected with accounting and reporting,
    - towards public authorities which are legally entitled to require the Controller to make personal data available to them (the basis for the processing is Article 6.1 (c) GDPR),
  - b) in order to perform contracts concluded by the Controller, exercise or defend the Controller's legal claims, fulfill internal administrative purposes of the capital group of Ten Square Games S.A. – including the purpose of maintaining the register of issued access cards, securing the access to the Controller's building and rooms for authorized persons, ensuring the possibility of verification of collection and return of access cards and, also, notifying the building manager of the need to block access cards in case they are damaged or lost (the basis for the processing is Article 6.1. (f) GDPR).
  - c) in the remaining scope, based on a consent to the processing of personal data (the basis for the processing is Article 6.1. (a) GDPR).
4. The provision of personal data is voluntary, but it is a requirement necessary to take up a position of the Management Board member, the Supervisory Board member, holder of a commercial power of attorney or attorney-in-fact as well as necessary for the Controller to perform its rights and obligations arising from the laws.
5. Personal data may be transferred to entities affiliated and cooperating with the Controller, in particular, to companies having capital and personal ties with the Controller, accountancy offices, law firms, IT companies, as well as to competent tax authorities and other authorities in accordance with applicable laws.
6. Due to the Controller's range of activities, personal data may be transferred to a third country, particularly in connection with the Controller's commercial relationships with entities having their registered seats in third countries. Personal data shall be transferred to a third country based on a decision confirming an adequate level of protection (Article 45 GDPR) or subject to appropriate safeguards (Article 46 GDPR).
7. Personal data may be processed for a period of time required by law or necessary to perform a contract and may be processed for a period necessary to realize the Controller's legitimate interests. In the case of personal data processed on the basis of a consent, the data will be stored until the purpose of data processing is fulfilled, unless the consent is previously withdrawn.
8. Personal data shall not be processed automatically in IT systems and shall not be profiled.
9. To the extent permitted by law, the data subjects have the right to request from the Controller access to and rectification or erasure of personal data or restriction of processing as well as the right to data portability and the right to lodge a complaint with a supervisory authority i.e. the President of the Personal Data Protection Office.
10. If the basis for the processing is a consent to the processing of personal data, the data subject has the right to withdraw it by any means and at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
11. If the basis for the processing is the Controller's legitimate interest, the data subject has the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her. In such case, the Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
12. The Controller informs that the building (common areas, hall, hall with lifts) where the Controller's offices are located, is under surveillance conducted by the building manager – MVGM Property Management Poland Sp. z o.o. with its registered seat in Warsaw. The monitoring data are stored by the aforementioned manager for a period of 30 days of their recording. All inquiries concerning the surveillance should be directed to the e-mail address: [n.glanowska@mvgm.com](mailto:n.glanowska@mvgm.com) or directed by contacting via telephone no. +48 883 360 244.