



1. Introduction

1.1 For customer service, the company collects personal data of customers, potential customers and employees.

The reasons for the above are due to the fact that the Company wants to provide a high level of customer protection, as confidentiality is the most important factor in gaining and maintaining trust between the Company and its employees, suppliers and customers.

Guarantees to ensure a high level of protection of personal data are accompanied by compliance with certain organizational and technical measures. Therefore, the Company has implemented a number of internal and external data protection policies that are mandatory for compliance by the Company's employees.

In addition, the Company is obliged to document, verify and monitor internal compliance with the data protection policy and the relevant statutory requirements in the field of data protection, which includes the GDPR (General Data Protection Regulation).

It is the Company's obligation to take all necessary measures to fully comply with all requirements related to data protection within the Company itself. Measures taken include: assignment of responsibilities, informing and training of personnel who are involved in data processing operations. Please note that the "Privacy Policy" document will be periodically revised in favor of taking into account new circumstances, however, the storage and processing of personal data will be regulated by the latest version of the document.

This privacy policy, together with recommendations for the processing of personal data, constitutes the general framework for the processing of personal data

1.2 "Personal data" means any information that may relate to an identified or identifiable natural person. For general understanding, an identified natural person is one who can be known directly or indirectly, in particular by an identifier: name, location data, phone number, age, gender.



Identified individuals can be: customers, employees, job applicants, suppliers, business partners, and others. In addition, the document includes different categories of personal data and confidential information, which includes: health indicators, account number, identification number, location data, online identifier and one or more factors specific to the physical, Physiological Genetic mental, economic, cultural or social identity of such natural person.

1.3 Information about companies or business enterprises is not personal data, however, it is worth noting that contact details in such companies or business enterprises, such as name, position, work email address, work phone number, etc., are considered personal data.

1.4 The Company collects personal data solely for legitimate business purposes, which include establishing and maintaining relationships with customers and suppliers, fulfilling purchase requests, hiring and managing all aspects of employment, exchanging information, complying with legal obligations and requirements, performing contracts, providing services to customers, and more.

1.5 Personal data will:

- to be processed lawfully, properly and transparently in relation to the data subject;
- be collected for these clear and legitimate purposes and will not subsequently be processed for any other purpose that is inconsistent with them;
- relevant to, related to, and used only to the extent necessary for the purposes of the processing;
- it is necessary to take all possible measures to ensure that personal data that are inaccurate in relation to the purposes of processing are deleted or corrected within a reasonable time;
- be stored in a form that ensures the identification of data subjects only for the period required for the purposes for which such personal data is processed;

- processed in a manner that ensures the security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

1.6 It is the company's responsibility to comply with the above points.

2. Legal Basis for Processing Personal Data

2.1 Legal bases on which the principle of personal data processing is based:

- a legal obligation or requirement;
- execution of the contract, a party to the contract, and the data subject;
- the consent of the data subject for one or more specific purposes;
- legitimate interests pursued by the Company.

2.2 Agreement

2.2.1 The collection, recording and further processing of personal data of customers, suppliers, business partners and employees is based on the consent of the identified natural person to process their personal data for one or more specific purposes. In turn, the company must be able to confirm that the data subject has consented to the processing of such personal data.

2.2.2 Consent to the processing of personal data by an identified natural person must be specific, unambiguous and provided voluntarily after receiving the necessary explanations. Therefore, the data subject must promptly provide personal consent to the processing of his personal data by means of a statement or an explicit confirming action.

2.2.3 A request by the Company for consent from the data subject must be provided in a clear and understandable form for all using simple, literate language.

2.2.4 In order for the Company to be able to process categories of personal data, i.e. personal data, the Client's consent must be expressed in a structured manner.



2.2.5 The data subject has the right to refuse to provide personal data at any time. Following the refusal, the Company undertakes to stop collecting and processing any personal data of the subject, provided that the Company is not legally obliged or entitled to do so.

2.3 Fulfillment of the terms of the contract:

2.3.1 It is lawful to collect and process personal data in connection with the performance of a contract to which the data subject is a party or to perform actions at the request of the data subject prior to signing the contract. This statement applies to all Contract Obligations and agreements signed by the Company, including those during the pre-contract period, regardless of the outcome of contract negotiations.

2.4 Fulfillment of legal obligations on the part of the Company and the Client

2.4.1 It is the company's responsibility to comply with all legal obligations that are based on the requirements and legislation of the European Union or its member states. Similar legal circumstances that are relevant to the Company may serve as a legal basis for the processing of the Client's personal data.

2.4.2 Legal agreements include obligations to collect, record and/or provide certain types of information about employees, customers, etc. Similar legal requirements are the legal basis for the processing of personal data.

2.5 Interests of the company

2.5.1 All data will be processed in the case of legitimate interests pursued by the company, such interests or fundamental rights have precedence over the rights of the data subject. When making a decision regarding data processing, the Company will first make sure that legitimate interests have overriding legal effect in relation to the rights and freedoms of a natural person and that the processing will not cause unlawful damage.



The processing of a potential customer's personal data for the purpose of expanding the business and developing new business relationships is in the legitimate interests of the company and is a specific legal example. It is the responsibility of the data subject to provide information about a specific legitimate interest if the processing is based on the current provision of the Privacy Policy.

3. Principle of Processing and Transfer of Personal Data

3.1 The Company as the Main Regulator of Personal Data Processing

3.1.1 When a data subject signs an agreement with a company, it is considered to be the controlling organization that processes personal data to the fullest extent. Such provisions allow the Company to make certain decisions on how the personal data of the subject will be processed.

3.2 Use of Data Processors

3.2.1 External data processors are those companies that process personal data on behalf of the company and in accordance with instructions. An example is the Company's control over HR accounting systems, third-party information technology providers, and others. If the Company for the processing of personal Data Attracts

participation third parties, the Company requires them to provide a high level of confidentiality. If this condition is not guaranteed, the Company undertakes to choose another data processor.

3.3 Data Processing Agreements

3.3.1 Before transferring personal data, the company undertakes to enter into a written data processing agreement with the data processor. The Agreement allows the Company to exercise control over the processing of personal data that is carried out outside the Company and for which the Company is responsible.

3.3.2 If the processor or co-processor is geographically located outside the EU/EEA, the terms of clause 3.4.4 below will apply.

3.4 Disclosure Statement

3.4.1 Before disclosing personal data to trusted persons, it is the Company's obligation to check whether the recipient is bound by cooperation agreements with us. Please note that the Company has the right to transfer personal information within the system, provided that the disclosure is justified by a legitimate business purpose.

3.4.2 The Company is obliged to clarify with the recipient the existence of a legitimate purpose for obtaining the personal data and to request that the transfer of personal data be limited and reduced to the necessary minimum.

3.4.3 The company must take into account all the risks associated with the transfer of personal Data Physical Persons Subjects

Data or legal entities outside the structure of the organization. If there is a legitimate purpose for the transfer of data, the transfer of data may be disclosed to third parties Persons That Act in As individual controllers that process personal data. 3.4.4 In a situation where the third-party recipient is located outside the EU/EEA in a country that does not provide an adequate level of data protection, the transfer of information is only permitted subject to the conclusion of a data transfer agreement between the Company and the third party. Pay attention A what agreement about Transfer data undertakes to be based on the EU Model Contractual Clauses.

4. Rights of Data Subjects

4.1 Obligations with respect to information

4.1.1 In a situation where the Company collects and registers personal data of subjects, the Company undertakes to inform such persons about:

- the purposes of the processing for which the personal data is intended, as well as the legal basis for the processing;
- the categories of personal data affected;
- legitimate interests pursued by the Company if the processing is based on a balance of interests;
- the recipients or categories of recipients of the personal data, if any;
- if it is applicable that the Company intends to transfer personal data to a third country and the legal basis for such transfer;

- the period for which the personal data will be stored or, if this is not possible, the criterion used to determine such period;
- the right to request from the Company access, correction or deletion of personal data, to restrict processing in relation to the data subject or to object to processing, as well as the right to data portability;
- in cases where the processing is based on the consent of the data subject, the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- the right to lodge a complaint with the Company through due process or with a supervisory authority;
- whether the provision of personal data is a statutory or contractual requirement or a requirement for entering into a contract, and whether the data subject is obliged to provide personal data and the possible consequences of refusing to provide it;
- the existence of an automated decision-making process, including profiling, and provide meaningful information about the logic applied and the importance and possible consequences of such processing for the data subject.

4.2 Access Control

4.2.1 The Company processes the personal data of any person, including employees of the organization, job applicants, external suppliers, potential customers, business partners and others who have the right to request access to their personal data, which is processed and stored by the Company.

4.2.2 The data subject has the right to access personal data and the right to know the reasons for data processing in accordance with the criteria, provided that the Company has access to the storage and processing of the data subject's personal data.

4.3 The Company undertakes to correct the exact personal data of the subject upon request and without undue delay.

4.4 The data subject has the right to request the complete deletion of personal data from the Company. In turn, the Company undertakes to delete personal data without undue delay, if not

is obliged to retain any information for a specified period of time in accordance with the requirements of the law (i.e. the requirements of the Financial Supervision Authority or the tax authorities).

4.5 If the request is applicable, the data subject has the right to request the Company to restrict the processing of personal data.

4.6 The data subject has the right to receive registered personal data, which will be processed in a readable machine format and presented in a generally accepted and structured form.

4.7 Taking into account the specific personal situation, the data subject has the right to object at any time to the processing of personal data in relation to such data subject, if the processing is based on a balance of interests, including profiling.

4.8 Any requests that the Company receives from the data subject regarding the exercise of the rights described in this paragraph, the Company undertakes to respond promptly, but no later than 30 days from the date of receipt of the request. The request will be immediately forwarded to the Service Center. The Company's specialist, who is responsible for the protection of the data of a particular subject, is obliged to assist the Service Center in processing the request in order to comply with the response deadline.

5. Methods taken to protect data

5.1 The Company undertakes to develop new products, services, technical solutions and other developments in such a way that they are safe for use and comply with the principles of special data protection and data protection by default.

5.1.1 Special data protection methods mean that special attention should be paid to data protection during the development of new services or products.

- For its part, the Company undertakes to accept the technical level, the cost of implementation and the nature, scope, context and purposes of the processing, as well as the risks of varying degrees of probability and criticality with regard to the rights and freedoms of natural persons that determine the processing;
- The Company undertakes, both at the time of determining the methods of processing and during the processing itself, to apply appropriate technical and organisational measures, e.g. pseudonymization, which are designed to implement the principles of protection in an effective manner

data minimization, and the integration of necessary safeguards into data processing in order to comply with data protection requirements and protect the rights of data subjects.

5.1.2 Protecting data privacy by default requires the implementation of innovative data minimization techniques.

- The Company undertakes to implement appropriate technical and organizational measures to ensure that only such personal data that is required for each specific purpose of processing is processed by default.
- Such a minimization requirement applies to the amount of personal data collected, the extent of processing, the retention periods and the availability of such data.
- Such measures are intended to ensure that access to personal data is granted by default only after careful

Consideration.

6. Stages of personal data processing processes

6.1 The Company acts as a controller for the processing of personal data. It is the Company's responsibility to maintain complete confidentiality during the recording of processing processes. The following information should be recorded in the records:

- name and contact details;
- purposes of processing;
- a description of the categories of data subjects and categories of personal data;
- recipients to whom personal data have been or will be disclosed, including recipients in third countries or international organizations;
- if applicable, details of transfers of personal data to third countries, including the identification of such third country and, if applicable, details of the relevant safeguards;
- if applicable, the time limits provided for the deletion of different categories of data;
- if applicable, a general description of the technical and organizational security measures applied.

6.1.1 It is the Company's obligation to provide data records at the request of the relevant data protection authorities.

7. Destruction of personal data

7.1 The Company undertakes to liquidate personal data, provided that there are no legal grounds for the continued processing or storage of personal data.

7.2 The Company's Data Retention and Sharing Policy provides a detailed description of the retention periods for different categories of personal data.

7.3 Upon completion of cooperation with the Company, clients or potential customers have the right to request the complete deletion and anonymization of personal data on their account.

7.4 Prior to the start of cooperation, it will analyze and assess the right to data protection of its customers (potential customers) with the requirements of other relevant regulatory documents. Please note that when registering personal data, any action is governed by legislation on financial transactions, accounting rules, customer protection standards and others.

7.5 The Company warns that personal data will be deleted if there are no necessary legal grounds for its further storage. The standard time frame for deleting customer information is the current year plus five years after the end of the customer relationship.

7.6 The Company's rules stipulate that the personal data of potential customers will be deleted or anonymized at their request in a short time, however, the procedure may take up to one month.

7.7 The data of those customers who have caused losses to the Company may be stored for a longer period of time in order to protect against further losses or in order to satisfy legitimate financial claims.

7.8 The above statement states that at the end of any period of cooperation, the Company will permanently delete or anonymize all personal data.

8. Probable risks

8.1 If the processing of personal data puts those whose personal data is processed at high risk, a privacy impact assessment (DPIA) should be conducted.

8.1.1 Conducting a privacy impact assessment assumes that the Company takes into account the full scope, context, nature, purposes of processing, risks of varying degrees of probability and criticality in relation to the rights and freedoms of natural persons, will apply appropriate technical and organizational measures to carry out the processing in accordance with data protection requirements and will be able to demonstrate this.

8.2 Technical and organizational measures should be reviewed and updated at least every six months.

8.2.1 As part of demonstrating compliance with relevant technical and organizational measures, compliance with codes of conduct or approved certification mechanisms on both legal parties is required.

9. Profiling

9.1 In the context of this privacy policy, "Profiling" is understood as the automated process of analyzing personal data in order to assess or predict a person's future behavior in the context of Cooperation. A company can Use profiling under the following circumstances:

- to assess creditworthiness;
- to provide clients and potential customers with information about the Company's products and services that may be of interest to them;
- to assist in the identification of potential cases of financial

Crimes.

10. International Requirements

10.1 For its part, the Company undertakes to comply with the General Data Protection Regulation and data protection laws at the national level. 10.2 If the national legislation of a particular country requires a higher level of protection of personal data than the Company can provide, it undertakes to comply with these requirements. If the policies or guidelines are more restrictive than the local one



legislation, it is necessary to comply with the Company's policies or recommendations.

11. Contact Details

11.1 If customers or potential customers have any questions regarding the content of this policy, it is necessary to contact the Company's specialist who is responsible for data protection