

**PRIVACY POLICY**

Pursuant to the 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, the Controller declares that it has implemented all measures the objective of which is to protect Users' data, which is expressed by way of this Privacy Policy.

**1. DEFINITIONS**

1.1. **Controller** – Fintredo Financial Technology based in Warsaw is the personal data controller.

1.2. **Personal data** - information on an identified or identifiable natural person; an identifiable natural person is a person that can be directly or indirectly identified, particularly on the basis of an identifier such as name and surname, identification number, location data, Internet ID or one or more particular factors specifying the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

1.4. **GDPR** - the 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;

1.5. **User** - a natural person whose data were obtained by the Controller by means of the Website and a natural person whose personal data were obtained by the Controller in a manner other than through the use of the Website;

1.6. Other definitions not specified above have the meaning customarily adopted.

**2. DATA CONTROLLER**

2.1. The Controller of the data gathered by means of the Website is Fintredo Financial Technology Sp. z o. o. with its registered office in Warsaw (postal code: 04-026) at al. Stanów Zjednoczonych 51/612, entered in the Register of Entrepreneurs of the National Court Register, the records of which are kept by the District Court for the capital city of Warsaw in Warsaw, XIII Commercial Division of the National Court Register, under KRS [*National Court Register*] number 0000671671, NIP [*Tax Identification Number*]: 1132936615, REGON [*National Official Business Register*]: 366933159, share capital: PLN 5,000.00.

Email: [office@fintredo.com](mailto:office@fintredo.com)

2.2. The Controller acts with due diligence in order to protect the interest of data subjects and, in particular, ensures that the data collected by it are:

1) processed in compliance with law;

	<ol style="list-style-type: none"> <li>2) collected for marked and legitimate objectives and not subject to further processing that is non-compliant with these purposes;</li> <li>3) substantively correct and adequate for objectives for which they are processed</li> <li>4) stored in the manner allowing to identify data subjects not longer than it is necessary to achieve the processing objective.</li> </ol>
<b>3.</b>	<b>OBJECTIVE OF DATA ACQUISITION</b>
3.1.	In connection with the User using the Website, the Controller collects data in the scope necessary for the provision of services by the Website as well as information on the User's activity on the Website.
3.2.	The personal data of users are to be especially protected and are used only in the scope to which the User consented.
3.3.	<p>The data of the User who consented to use Cookies by the Website are processed by the Controller in order to:</p> <ol style="list-style-type: none"> <li>1) transfer data in the network and maintain proper operation of the basic functions of the Website;</li> <li>2) analyse the manner in which the Website is used in order to improve the effectiveness and the method of User service;</li> <li>3) adjust the displayed advertisements for the needs and preferences of the Users and make the content published in the scope of the Website available by means of external social networks and other external websites, including for advertising purposes;</li> <li>4) perform analytical and statistical activities;</li> <li>5) perform marketing activities.</li> </ol>
3.4.	The personal data of the User-candidate for work are processed for purposes connected with ongoing recruitment.
3.5.	<p>The personal data of User-potential investor are processed in order to:</p> <ol style="list-style-type: none"> <li>1) establish potential cooperation,</li> <li>2) contact the User,</li> <li>3) perform legitimate interests of the Controller,</li> <li>4) perform analytical and statistical activities.</li> </ol>
<b>4.</b>	<b>SCOPE OF PROCESSED DATA</b>
4.1.	<p>The Controller can process the following data of the Users who expressed their consent for the Website to use Cookies:</p> <ol style="list-style-type: none"> <li>1) type of used device;</li> <li>2) unique device number;</li> <li>3) IP address and operational system of the device;</li> <li>4) browser type;</li> <li>5) information on how the website is used and diagnostic information;</li> </ol>

	<ul style="list-style-type: none"> <li>6) Search history;</li> <li>7) session summary;</li> <li>8) Location data and other data provided automatically by means of the Internet browser.</li> </ul>
4.2.	<p>With reference to Users-candidates for work, the Controller collects information included in application documents provided during conversations, e-mail exchanges and meetings. In particular, these are the following:</p> <ul style="list-style-type: none"> <li>1) full name;</li> <li>2) Contact details;</li> <li>3) information on education;</li> <li>4) information on professional experience;</li> <li>5) information on qualifications;</li> <li>6) information on foreign knowledge;</li> <li>7) information on interests.</li> </ul>
4.3.	<p>With reference to Users-potential investors, the Controller collects the information made available to it by the User by means of electronic mail, telephone or in person. For example it can be:</p> <ul style="list-style-type: none"> <li>1) full name;</li> <li>2) e-mail address;</li> <li>3) cell phone number;</li> <li>4) business name (in case of the Users who are not consumers)</li> </ul>
4.4.	<p>In case of expressing a separate consent, personal data of the Users can be processed for receiving commercial information sent by the Controller to the given electronic e-mail address under Art. 6(1)(a) of GDPR.</p>
<b>5.</b>	<b>LEGAL BASIS FOR DATA PROCESSING</b>
5.1.	<p>For Website Users, the legal basis for processing is:</p> <ul style="list-style-type: none"> <li>a) consent of the User (Art. 6(1)(a) of GDPR);</li> <li>b) Legitimate interest associated with informing about the Controller's activity and presentation of services offered by the Controller by means of the Website (art. 6(1)(f) of GDPR).</li> </ul>
5.2.	<p>For Users-candidates for work, the basis for processing data is:</p> <ul style="list-style-type: none"> <li>a) consent of the User (Art. 6(1)(a) of GDPR);</li> <li>b) legitimate interests of the Controller associated with objectives of internal administration, provision of security and legal service of any claims (Art. 6(1)(f) of GDPR).</li> </ul>
5.3.	<p>For Users-potential investors, the basis for processing data is:</p> <ul style="list-style-type: none"> <li>a) consent of the User (Art. 6(1)(a) of GDPR);</li> <li>b) legitimate interests of the Controller (Art. 6(1)(a) of GDPR), i.e. commencement of potential</li> </ul>

	<p>cooperation, purposes associated with any claims, administrative, statistical, report purposes as well as direct marketing of the Controller's services.</p> <p>c) in order to conclude and perform an agreement (Art. 6(1)(b) of GDPR).</p>
<b>6.</b>	<b>RIGHTS OF USERS ASSOCIATED WITH PERSONAL DATA PROCESSING AND AUTOMATED DECISION MAKING</b>
6.1.	Every User has a right to access their data, including the possibility to obtain their copy, rectification of data, demand to erase them, restriction of processing, objection towards processing and transfer of provided data to another data controller. The User should contact another User by the e-mail address made available in the Website.
6.2.	The User can withdraw their granted consent at any time by the e-mail address made available in the Website. Withdrawal of consent does not affect the compliance with the processing right which was exercised on the basis of consent before its withdrawal.
6.3.	The User has a right to lodge objections with the supervisory body acting in the scope of personal data protection.
6.4.	Provision of personal data is voluntary but necessary to establish potential cooperation or employment relationship.
<b>7.</b>	<b>DATA RECIPIENTS</b>
7.1.	<p>If it is necessary to pursue purposes which involve the processing of the User's data by the Controller, the User's data can be provided to:</p> <p>a) entities authorised to obtain them under provisions of law (e.g. law enforcement authorities, supervisory authorities etc.);</p> <p>b) entities processing personal data at the request of the Controller, i.e. companies providing certain services for the benefit of the Controller, the performance of which is connected with the processing of personal data, e.g. to entities operating IT systems or making ICT tools available to us, entities providing services in the scope of accounting, marketing or recruitment for us;</p> <p>c) other entities being a part of the Group to which the Controller belongs, i.e. entities linked with the Controller by capital or by person.</p>
<b>8.</b>	<b>DATA STORAGE PERIOD</b>
8.1.	<p>If the User is a potential investor, the Controller will store the data of the User as long as they will be useful for pursuance of marketing objectives, until the User withdraws their consent or expresses objection towards the processing of their personal data.</p> <p>If the User concludes an agreement with the Controller, the Controller will store the former's data as long as the provisions of law specify and for the period determined by regulations on claims.</p>

8.2.	If the User is a candidate for work, the Controller will store the User's until the end of recruitment process and if the User expressed their consent for data processing in future recruitment processes, until the User withdraws their consent.
8.3.	If the User expressed its consent for the Website to use Cookies, they will remain in the memory of the User's device: <ul style="list-style-type: none"> <li>a) until the browser is closed (session cookies);</li> <li>or</li> <li>b) permanently until they are erased or they expire (persistent cookies).</li> </ul>
<b>9.</b>	<b>DATA SECURITY</b>
9.1.	The Controller stores data on its servers which ensure full security.
9.2.	The Controller conducts risk analysis on a current basis in order to guarantee that they process personal data safely – primarily they guarantee that access to data is granted only to authorised persons and only in the scope in which it is necessary due to tasks performed by those persons. The Controller ensures that all operations on personal data are registered and performed only by authorised employees and partners.
<b>10.</b>	<b>DATA PROTECTION OFFICER</b>
10.1.	The Data Protection Officer was appointed by the Controller. The officer can be contacted: <ul style="list-style-type: none"> <li>• by e-mail: <a href="mailto:iod@fintredo.com">iod@fintredo.com</a></li> <li>• in writing, to the address of the Controller's registered office: Aleja Stanów Zjednoczonych 51/612, 04-026 Warsaw</li> </ul>
10.2.	The Data Protection Officer can be contacted in all cases regarding the processing of personal data and the exercise of rights connected with data processing.
<b>11.</b>	<b>FINAL PROVISIONS</b>
11.1.	If there are links redirecting to other websites that are not under the administration of the Controller, the Controller cannot be liable for the content of those websites or for level at which the controllers of those websites protect privacy.
11.2.	The Controller reserves the right to introduce amendments or supplementations to this Privacy Policy. The changes are effective as of their introduction.
11.3.	The Controller uses the so-called Cookies, the detailed terms of which are specified in Cookies Policy, which can be found on the Website.

