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1. The rules for processing and protection of user data

- 1.1. The Operator processes user data, including personal data, for the purposes for which it has been collected. The Users' personal data is subject to adequate protection and is made available to third parties only within the limits permitted by applicable legislation.
- 1.2. The Operator and administrator of personal user data is NEO BANKERS LLC, a company registered and operating in accordance with the legislation of Poland, KRS (National Court Register) code 0000981293, registered at the address: Żłota 61/101, 00-819 Warsaw, Poland.
- 1.3. The Operator processes personal user data in accordance with 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 (General Data Protection Regulation, hereinafter "GDPR"), the Polish Act of 10 May 2018 on Personal Data Protection, Directive 2002/58/EC (ePrivacy Directive), and the Polish Act of 18 July 2002 on Providing Services by Electronic Means, implementing appropriate technical and organizational measures to ensure a level of security appropriate to the risk of infringement of data subjects' rights and freedoms.
- 1.4. In all activities related to the processing of personal user data, the Operator ensures:
 - 1.4.1. Processing of personal data lawfully, fairly, and in a transparent manner in relation to the data subject (Article 5(1)(a) GDPR).
 - 1.4.2. Collection of personal data for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes (Article 5(1)(b) GDPR).
 - 1.4.3. Personal data is adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed (Article 5(1)(c) GDPR).
 - 1.4.4. Personal data is accurate and, where necessary, kept up to date (Article 5(1)(d) GDPR).
 - 1.4.5. Personal data is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (Article 5(1)(e) GDPR).
 - 1.4.6. Personal data is processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures (Article 5(1)(f) GDPR).
- 1.5. The Operator grants all users of the Service the following rights in accordance with Chapter III of the GDPR:
 - 1.5.1. The right of access to their personal data (Article 15 GDPR).
 - 1.5.2. The right to rectification of their personal data (Article 16 GDPR).
 - 1.5.3. The right to erasure of their personal data ('right to be forgotten') (Article 17 GDPR).
 - 1.5.4. The right to restriction of processing of their personal data (Article 18 GDPR).
 - 1.5.5. The right to data portability (Article 20 GDPR).
 - 1.5.6. The right to object to processing of their personal data (Article 21 GDPR).

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- 1.6. Each User of the website has the right to lodge a complaint with a supervisory authority in relation to the data processing performed by the Operator, in accordance with Article 77 GDPR. In Poland, the supervisory authority is the President of the Personal Data Protection Office (Urząd Ochrony Danych Osobowych).
- 1.7. Access to personal data is granted only to individuals having direct written authorization from the Operator.
- 1.8. The Operator informs that access to personal data may also be obtained by authorized state bodies within the competence determined by the relevant legislative instruments, including judicial authorities (including the police, prosecutor's office, courts).
- 1.9. The Operator may be obliged to provide information collected by the Service to other authorized entities based on legitimate requests and to the extent of such requests.
- 1.10. The Operator may provide personal user data to the following entities, insofar as necessary:
 - 1.10.1. Operators of Electronic Payment Systems for payment processing and fraud prevention.
 - 1.10.2. Postal operators for correspondence and parcel delivery.
 - 1.10.3. Entities rendering marketing services at the request of the Operator, including personalization of contacts with the User.
- 1.11. The Operator allows the processing of personal user data to be entrusted to third parties only to the extent necessary for accounting, legal, and IT services of the Operator. The Operator may also entrust the processing of personal data to entities that render marketing services with regard to the Operator's goods and services. The User can at any time receive information about the entities entrusted with the processing of personal data, as well as about their trustworthiness and the purpose of such processing.
- 1.12. In the event third parties are involved to verify and identify Users and store electronic copies of documents provided by the Users, such third parties must comply with the rules and procedures for the protection of personal user data, as required by the GDPR and the applicable Polish Act on Personal Data Protection.
- 1.13. The Operator provides each User with direct and permanent access to the latest information on the conditions and procedures for processing and protecting their personal data. The Operator, in particular, informs the User of any changes in this regard. Access to information is granted by providing the current version of the Privacy Policy and the Cookies Policy on the Service webpages. In addition, the User can at any time receive information and answers to inquiries by e-mail, as well as submit any applications and requests for the processing of their personal data. The User can at any time request to terminate the processing of their personal data or their modification and correction.
- 1.14. Before the User provides their personal data and agrees to its processing, the Operator provides the User with the Privacy Policy containing all the information stipulated by law. Registration of a User or ordering any service is only possible after the User submits an application confirming they have carefully read the Privacy Policy and the information on the principles of personal data processing.

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2. Cookies Policy

- 2.1. The Operator's Services use cookies. The use of cookies is regulated by Directive 2002/58/EC and the Polish Act of 18 July 2002 on Providing Services by Electronic Means.
- 2.2. Cookies are small text files containing data that are stored on the user's device when visiting a website. They typically contain the name of the website they come from, their storage duration on the device, and a unique number.
- 2.3. The Service Operator is the entity placing cookies on the user's device and gaining access to them.
- 2.4. Cookies are used for the following purposes:
 - 2.4.1. Generating statistics that help understand how users interact with the website, which allows improving its structure and content.
 - 2.4.2. Maintaining user sessions (after logging in) so that the user does not have to re-enter their login and password on each page of the site.
 - 2.4.3. Providing personalized content and advertising that matches the user's interests.
 - 2.4.4. Measuring the effectiveness of marketing campaigns.
- 2.5. The Service uses two main types of cookies:
 - "Session" cookies: temporary files stored on the user's device until they log out, leave the website, or close the software (web browser).
 - "Persistent" cookies: stored on the user's device for the time specified in the cookie parameters or until they are deleted by the user.
- 2.6. Software for browsing websites (web browser) usually allows storage of cookies on the user's device by default. Users of the Service can change cookie settings at any time. These settings can be changed in particular to block the automatic handling of cookies in the web browser settings or to inform about their placement on the user's device. Detailed information about the possibilities and ways of handling cookies is available in the software (web browser) settings.
- 2.7. The Operator informs that restrictions on the use of cookies may affect some of the functionalities available on the Service websites. For example, this may complicate the process of authentication or saving user preferences.
- 2.8. Cookies placed on the Service user's end device may also be used by advertisers and partners cooperating with the Service operator. This allows for the provision of more relevant advertising and content.
- 2.9. We recommend that you familiarize yourself with the privacy policies of these companies to learn about the rules for using cookies used in statistics: Google Analytics Privacy Policy.
- 2.10. Cookies may be used by advertising networks, including Google, to display ads tailored to how the User uses the Services. For this purpose, they may store information about the User's navigation path or the time spent on a particular webpage.
- 2.11. Regarding information about user preferences collected by the Google advertising network, the User can view and edit information derived from cookies using the following tool:
<https://www.google.com/ads/preferences/>.

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- 2.12. If the User does not wish to receive cookies, they can change their browser settings. However, disabling cookies necessary for authentication processes, security, maintaining user preferences may hinder, and in some cases completely prevent the use of the websites.
- 2.13. To manage cookie settings, please follow the instructions provided for each web browser. Detailed instructions can be found in the help materials of your browser.

3. Legal Bases for Data Processing

- 3.1. The Operator processes personal data on the following legal bases provided for in Article 6 of the GDPR:
- Consent of the data subject (Article 6(1)(a) GDPR): The User has given consent to the processing of their personal data for one or more specific purposes. For example, consent to receive marketing materials.
 - Performance of a contract (Article 6(1)(b) GDPR): Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. This relates to the processing of data necessary to provide services to the User.
 - Legal obligation (Article 6(1)(c) GDPR): Processing is necessary for compliance with a legal obligation to which the Operator is subject. For example, storing data for tax purposes.
 - Vital interests (Article 6(1)(d) GDPR): Processing is necessary in order to protect the vital interests of the data subject or of another natural person.
 - Public interest (Article 6(1)(e) GDPR): Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Operator.
 - Legitimate interests (Article 6(1)(f) GDPR): Processing is necessary for the purposes of the legitimate interests pursued by the Operator or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. For example, processing data for fraud prevention.

4. Transfer of Data to Third Parties and Third Countries

- 4.1. The Operator may transfer personal data to third parties in accordance with Article 28 of the GDPR. Such transfer is carried out only on the basis of a data processing agreement that ensures an appropriate level of data protection.
- 4.2. Transfer of data to countries outside the European Economic Area (EEA) is carried out in accordance with Chapter V of the GDPR, using standard contractual clauses approved by the European Commission, or other appropriate safeguards. This ensures that users' personal data receives an adequate level of protection, even when transferred to countries that do not provide the same level of data protection as the EU.

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5. Data Storage and Minimization

- 5.1. The Operator adheres to the principles of storage limitation and data minimization established by Article 5(1)(c) and (e) of the GDPR:
 - a) Data minimization principle (Article 5(1)(c) GDPR): Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. The Operator collects and processes only the data that is truly necessary for the provision of services or fulfillment of legal obligations.
 - b) Storage limitation principle (Article 5(1)(e) GDPR): Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. The Operator stores data only for the period necessary to achieve the processing purposes, after which the data is deleted or anonymized.
- 5.2. The Operator regularly reviews the stored data and deletes that which is no longer needed. Different retention periods may be established for different types of data depending on the processing purposes and legislative requirements.

6. Policy Updates

- 6.1. This Policy is regularly reviewed and updated in accordance with the principle of accountability established by Article 5(2) of the GDPR. This ensures that the Policy remains current and complies with current data processing practices and legislative requirements.
- 6.2. Users will be notified of any significant changes to the Policy through the website or via email. It is recommended to regularly check the Policy for updates.

Revision date: August 12th, 2024.

We appreciate your time.
Respectfully, sincerely yours,

The NeoBankers team