

# PERSONAL DATA PROCESSING POLICY (PDPP)

regulating the purpose and means of processing personal data when providing Services to Users under the Framework Agreement concluded between the User and the Company effective as of 21 April 2022.

The operator of the Platform is Fintown s.r.o., Business ID: 17323657, with registered office: Prvního pluku 211/5, Karlín, 186 00 Prague 8, registered in the Commercial Register kept by the Municipal Court in Prague under the registration number C 369924, represented by Mr. Maxim Vichorevy, the company's managing director, contact e-mail: admin@fintown.eu ("**Company**")

The Company is the controller of the personal data of Users listed below. The Company has not appointed a data protection officer.

## Scope and legal basis of processing

The Company processes such Users' personal data collected from Users to the extent necessary for the following purposes:

- 1) login data (email address and, where applicable, password, stored in encrypted form using a one-way hashing function) that are necessary for the conclusion and performance of the contract or for the implementation of measures taken before the conclusion of the contract,
- 2) identification data (in particular name and surname, date of birth, permanent or other residence) necessary for the performance of the contract and for the fulfilment of the legal obligation to which the Company is subject,
- 3) contact information (e-mail address, mobile phone number, User's bank account, User's payment reference number) that is necessary for the performance of the contract or for the implementation of measures taken prior to the conclusion of the contract,
- 4) the history of transactions in the Wallet (details of deposits, withdrawals, amounts invested, proceeds received and fees charged) which are necessary for the performance of the contract, for the fulfilment of the legal obligation to which the Company is subject and for the protection of the Company's legitimate interests in the event of legal disputes,
- 5) the history of the User's movements on the Platform (for example, data on pages visited and actions on the site, including data on the HW and SW equipment used and the User's internet connection), which is necessary for the performance of the Agreement and for the protection of the Company's legitimate interests in the event of legal disputes.
- 6) data necessary to fulfil the obligation to identify and control the customer pursuant to Act No. 253/2008 Sb., on certain measures against the legalization of proceeds of crime and terrorist financing (e.g. a copy of the identity card, information on the source of income, purpose of the transaction, status of politically exposed person, place of birth)

## Purpose of Processing

The Company processes Users' personal data to properly and efficiently provide its services to Users, in particular:

- 1) for the purpose of communication with the User in the performance of contractual obligations,
- 2) for the purpose of fulfilling legal obligations, in particular obligations of a public law nature,
- 3) for the purposes of troubleshooting and preventing technical problems, providing user support and generally improving the services provided by the Company,
- 4) for marketing purposes, where the Company is entitled to send Users marketing offers to a

reasonable extent.

The provision of the User's personal data is the fulfilment of a contractual and legal obligation and is a necessary condition for the conclusion of the Framework Agreement. The consequence of not providing personal data is that the Company cannot conclude a Framework Agreement with the User and the User cannot invest on the Platform.

The Company will never sell or rent personal information to other entities.

## Storage, Transmission and Protection of Personal Data

Users' personal data is stored on devices located in the European Union. The company has conducted a risk analysis and, on the basis of this analysis, has adopted technical and organizational measures to maximize the security of personal data against unauthorized access by third parties.

The personal data of Users is stored from the moment of creation of the User's Profile according to Article 2 of the Platform Rules until three (3) full calendar years after the cancellation of the Profile according to Article 8 of the Platform Rules.

Users' personal data is not subject to automated decision-making. The Company is entitled to transfer Users' personal data to the following processors and recipients to the extent and under the conditions set out below:

- 1) to state administration authorities and other persons exercising the authority's powers for the purpose of fulfilling the Company's obligations under applicable law, 2) to subcontractors of web hosting, mailing, cloud and transport services for the purpose of fulfilling the Company's contractual obligations to Users,
- 3) to banking institutions, in particular the bank with which the Company maintains a bank account where the Users' funds are collected, and to the insurance company with which the Company is insured against liability for damages towards the Users, for the purpose of fulfilling the Company's legal and contractual obligations towards the Users,
- 4) to Internet advertising service providers to the extent of the Company's legitimate interests.

## User Rights

The User has the right to access and correct his/her personal data if the Company processes inaccurate or outdated personal data of the User. Upon request, the Company will verify the timeliness and completeness of the personal data and, if it finds any errors, will arrange for correction (by correction, completion or complete removal). During the period of verifying the accuracy of the User's personal data, the Company is obliged to restrict its processing and inform the User about the remedy and cancellation of the restriction of processing.

The User has the right to have personal data deleted. The User is entitled to exercise the right to erasure only if the purpose for which the Company processed the User's personal data ceases to exist, the User objects to the processing of his/her personal data and the objection is found to be justified, the processing of the User's personal data is unlawful, or the law obliges the Company to erase the User's personal data. The right to erasure of personal data is limited and cannot be exercised by the Company if the Company is legally obliged to process the User's personal data or if the User's personal data is processed for the establishment, exercise or defence of legal claims.

The User has the right to limit the processing of personal data, on the basis of which the Company is obliged to store the User's personal data only and not to process it further. This right may be exercised by the User in the event that he/she considers that his/her personal data is processed inaccurately (see the right to rectification), that the Company is obliged to delete the User's personal data due to a conflict with the law, but the User personally refuses the deletion, or in the event that, the Company no longer needs the User's personal data for the purpose for which it was obtained and is obliged to delete the User's personal data, but the User personally refuses the deletion for the establishment, exercise and defence of legal claims, and if the User has objected to the lawfulness of the processing of his/her personal data (see right to object). At the same time, the Company is entitled to process the User's personal data after exercising the right to restrict processing only with the User's consent and for the establishment, exercise and defence of legal claims or for the protection

of the rights of another natural or legal person and for the purposes of an important public interest of the State or the European Union.

The User has the right to object to the processing of personal data if the Company processes the User's personal data on the basis of its legitimate interest, for the purposes of public interest or public authority, for direct marketing purposes or for scientific or historical research.

The User has the right to transfer his/her personal data to another personal data controller and the Company is obliged to provide the User with the processed personal data in a machine-readable format (.xls, .xlsx, etc.) in case the Company processes the User's personal data on the basis of his/her consent or for the purpose of contract performance or if it is sensitive personal data processed on the basis of the User's explicit consent.

The user has the right to file a complaint against the processing of his/her personal data with the supervisory authority of the Office for Personal Data Protection at Pplk. Sochora 27, 170 00 Prague 7, Phone: 234 665 125, or by calling a line specifically set up for GDPR consultations: 234 665 800 or by e-mail: [posta@uouu.cz](mailto:posta@uouu.cz).

## Changes to the PDPP

The Company is entitled to unilaterally change the PDPP in accordance with the provisions of Section 1752 of the CC, however, it is obliged to notify the User of such changes at least two (2) weeks prior to their effectiveness. If the User does not agree with the changes, the User is entitled to terminate the Framework Agreement until the effective date of the changes. The User acknowledges that unless the User terminates the Framework Agreement for the reasons set out in the preceding sentence, the changes are effective as of the date specified in the notice.