

INFORMATION OBLIGATION OF GDPR

As of the 25th of May 2018 the Regulation of the European Parliament and the Council (EU) 2016/79 applies

of the 27th of April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing the Directive 95/46/EC ("GDPR"). In order to provide information, how your personal data is processed by the companies of the EULEO Group, we provide necessary information in this respect below, thereby complying with the information obligation. The basis constitutes the Regulation of the European Parliament and the Council (EU) 2016/679 of the 27th of April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (GDPR), effective as of the 25th of May 2018 in the territory of the European Economic Area.

The controllers of your personal data are the companies from the EULEO Group, which include the following entities:

- EULEO spółka z ograniczoną odpowiedzialnością spółka komandytowa, NIP (TIN) 9451946623
- Kancelaria EULEO M. Burczyńska-Radym, D. Olszewski Radcowie Prawni spółka komandytowa NIP (TIN) 9452052460
- EULEO spółka z ograniczoną odpowiedzialnością NIP (TIN) 9452166146

with the registered office in: Kraków 31-231, ul. Bociana 22.

The abbreviated business name of EULEO relates to each of the aforementioned entities.

Your personal data is mainly processed to establish or maintain business relationships between you and the companies from the EULEO Group, direct marketing of products or services of these companies, as well as to send commercial information. The legal basis for processing of your personal data is the article 6, par. a),b),c),f) of GDPR.

PRIVACY POLICY

We take care of your personal data in the EULEO Group. Information about the privacy policy explains personal data types, which we collect. Moreover, it provides the reason for its collection and use, as well as their retention period. We also explain your right to get access, to correct or to object to processing of this data (including the request to delete it in compliance with the binding provisions). This policy refers to customers and also to stakeholders, who visit our websites.

1) Is EULEO the "data controller"?

Yes, EULEO is the "data controller" in compliance with the definition specified by the binding provisions (GDPR). It means that EULEO is a legal person that decides about the purposes of data collection and manages personal data stored by it. Moreover, it is required by law to establish policies, processes and procedures aiming at protection of this data and respecting rights of persons, whose data is collected.

2) What type of personal data is collected by EULEO?

EULEO can collect the following personal data categories, depending on provided information or selected preferences:

- a) The data, which you provide, e.g. while registering to our services, such as: last name, e-mail address, telephone number, position, and company name.
- b) If you visit our website, then we collect information by using cookie files. We use cookie files in order to provide you with a user-friendly, safe and effective website, as well as to offer services

matching your needs and interests, e.g. by adopting to your browser history or providing advertisements (of a third party) directed at you.

c) The information, which we obtain from third parties (e.g. information providers) or from officially available sources (e.g. commercial registers).

3) Why and on which legal basis does EULEO use your personal data?

We use your data:

a) on the basis of your consent:

- i) to provide, to maintain, to improve and to develop our services, as well as to apply them to your needs and interests (e.g. in order to offer you customized advertisements),
- ii) to contact you,
- iii) to inform and to advise you in relation to EULEO products (e.g. by sending advertisements to you),

b) to prepare and/or to execute the contract concluded with you, in order to:

- i) to prepare offers for one of our products, to provide you our services and to fulfil mutual contract obligations,
- ii) to create and maintain user accounts in our Internet systems and platforms,
- iii) to provide technical support or for the other related purposes,

c) within the framework of our legal interest:

- i) to provide, to maintain, to improve and to develop our services, as well as to apply them to your needs and interests (e.g. in order to offer you customized advertisements),
- ii) to improve safety of EULEO IT systems - for the benefit of all our users,
- iii) to contact you,

d) in order to meet legal requirements in the scope of law enforcement petitions or disclosure procedures or also - if it is required by the binding provisions - court orders, regulations of governments or governmental authorities; if it is necessary to examine, to prevent or to undertake measures related to illegal activity, suspected cases of financial frauds, situations posing a potential threat to safety of persons or violation of our policies or conditions,

e) to protect and pursue our claims.

If we use your data for the other purposes than the ones specified in this policy, we shall notify you about another purpose and we shall obtain your consent, if it is required.

4) Where is your personal data processed?

The personal data collected by EULEO can be processed both inside the European Economic Area ("EEA") or outside of it, being always subject to the contractual restrictions regarding confidentiality and safety in compliance with the binding provisions in the scope of data protection. We do not disclose your personal data to entities that are not authorised to process it. Any time we shall pass your personal data to be processed outside of EEA, we shall implement effective transfer mechanisms (e.g. standard EU contractual clauses or binding corporate rules) in order to guarantee adequate level of data protection.

5) How long shall we store your personal data?

We shall not store your personal data for the period longer than it shall be necessary to achieve the objectives, for which it has been collected or to perform the obligations imposed by the law or within the scope admissible by law, e.g. to protect claims. After this time we shall delete your personal data. Individual retention periods depend on personal data type and a specific purpose of its processing.

6) What are your rights regarding personal data?

To the extent permitted by applicable legal provisions regarding data protection, you are entitled to:

- a) to get access to personal data, which is related to you, including such information as: data sources and categories, purposes of processing, recipients (or recipient categories) and the adequate retention period.
- b) to request updating or correcting your personal data, so that it always is accurate;
- c) to obtain your personal data in electronic format for you or for another controller;
- d) to request deleting of your personal data, if it is no longer necessary to achieve the objectives, for which it has been collected or processed in the other manner;
- e) to limit processing of your personal data in certain circumstances, for example: if you have questioned accuracy of the personal data, which is related to you, for the period enabling verification of its precision;
- f) to object to processing of your personal data due to special circumstances related to your special situation, which prevails over our justified legal basis for its processing.
- g) to withdraw a consent at any time in the case, when your personal data is processed on due to your consent, without any impact on legality of processing on the basis of your consent before its withdrawal or if there is any other legal basis to process your data (e.g. prevailing legal interest);
- h) to make a complaint to the data controller and/or to the Personal Data Protection Office.
- i) you can exercise your rights by contacting us and providing your last name and e-mail address, as well as the purpose of your request.

7) How does EULEO collect personal data through Internet websites?

Only such personal data is collected on the Internet websites of EULEO, which you voluntarily provide in online forms or you enable to collect it by us according to the cookie file preferences, which you have selected, when you have visited our website for the first time. You have the right to withdraw your consent at any time and if you do so, we shall stop processing of your data, which is related to you and collected on this website. You can withdraw your consent by writing to us to the email address: rodo@euleo.pl

8) What are cookie files?

A cookie file is a small piece of data stored on your computer or your mobile device, which enables a website to “remember” your actions or preferences. We use cookie files to guarantee proper operation of our websites and to make it possible for you to access them, collecting information about your device and preferences (e.g. about your browser). Moreover, we collect information about mutual interaction of you and our services or services of our partners, such as advertising services. In principle, you can use our website without cookie files. However, if you want to use our website in a complete and convenient way, you should approve these cookie files. We use the following files on our Internet website:

| Cookie file name | Use: | Storage time | Cookie file type |
|------------------|---|--------------|-------------------------------|
| Google Analytics | Google Analytics cookie files serve to monitor entries on the website | 3 years | Cookie files of a third party |

9) Does EULEO collect and process your personal data from third parties?

Yes. We can collect information about you and your company in order to assess and monitor our own risk of losing receivables and debt collections, while providing our customers with solutions in the scope of debt management and legal aid. We collect information from third parties and officially available information. Moreover, we can collect information, which you make available to us directly. The collected data relate to:

- a) economic operators, including individuals conducting a business activity: industry, name, last names of representatives (e.g. directors, management board members), last names of owners, and information related to creditworthiness (e.g. payments and risk incidents),
- b) natural persons: first name, last name, e-mail address, information related to your creditworthiness (e.g. payments, and risky incidents).

10) How can you contact us?

In the case of any questions related to personal data, which are related to you, you can contact us under the following address: rodo@euleo.pl

11) How often do we update information about the privacy policy?

We review information about the privacy policy every 6 months and we amend it, if it is required. We ensure that the newest version is available here. We can also notify you directly (e.g. by e-mail), if any significant amendments have been made. This information about the privacy policy was updated last time on the 25th of May 2018.