

Privacy Policy
w Fenige Sp. z o.o.

The protection of Fenige customers' privacy is very important for us. Below we are publishing an explanation about the data that we collect and the principles of their processing and utilizing that we apply. We restrict the use and collection of information about site users to the necessary minimum required to provide top-level services.

This document includes information on: the Personal Data Controller, data subjects' rights, cookie files namely browser cookies,

In order to maintain transparency, the following phrases have been used in this document:

We – Fenige Sp. z o.o., Promienna 10 Street, 03-672 Warsaw, registered in the

District Court for the capital city of Warsaw in Warsaw 13th Commercial Department of the National Court Register, under number

KRS: 0000461471, NIP (tax ID): 118-209-20-36, REGON (business register number): 146693435, the share capital of which is PLN 962 500,

You – a natural person that entrusts their personal data for processing due to at least one purpose as specified in this information. In order to increase transparency of the text, we have allowed ourselves to use the direct „you” phrase.

1. Information on Privacy Statement

In this Privacy Statement we explain, in an accessible and clear manner, what kinds of your personal data we collect, and how we process them. The Statement refers to:

- our all former, present and potential clients. By virtue of law, we are obliged to keep the personal data about you, also for a specified time after the end of our relations,
- all the persons participating in any transaction via Fenige services.

Personal data refer to any information that may tell us something about you or that we can connect with you. This applies to your first and last name, telephone number, address of residence, IP address, or information about any payments that you make with our agency. Processing should be understood as anything that we can do with such data, e.g. collecting, recording, organizing, ordering, storing, adapting or modifying, collecting, browsing, using, disclosing by sending, disseminating or another kind of sharing them, adapting or combining, limiting, deleting or destroying.

You make your personal information available to us, when you become our client, register under our online services, fill in an online form, use our products and services or contact us through one of our communication channels.

2. Types of data we collect about you

Personal data

- Sender's identification data: first name, last name, number of identity document, street, building number, premises number, postal code, city, country, e-mail telephone number;
- Recipient's identification data: first and last name, e-mail;
- Data concerning the transaction, such as the number of your payment card, the number of the recipient's payment card, amounts and places where the transaction is made;
- IP address of the computer or the mobile device, browser data, device data.

Sensitive data

We do not obtain or process natural persons' sensitive data.

Profiling

We do not perform natural persons' profiling.

3. What do we do with your personal data?

We use your personal data only for justified business reasons. This is concerned with the following circumstances:

- a) in order to render the services – based on the need to process the personal data to perform the agreement;
- b) for analytical and statistical purposes – on the basis of a legitimate interest of the Company such as analysis of performance of the Company's business operations;
- c) for direct marketing purposes of the Company's own products or services – on the basis of the Company's legitimate interest such as direct marketing of its own products or services;
- d) for marketing purposes (other than mentioned in letter c above) or receiving commercial information – on the basis of the Sender's voluntary consent;
- e) in order to determine, assert or defend against claims and legal obligations of the Company – on the basis of the Company's legitimate interest being the right to exercise the aforementioned rights and fulfill legal duties. We can process your personal data to protect you against unfair actions, e.g. if you become a victim of identity theft, your personal data have been disclosed or a hacker has broken into your device.

4. Whom do we make your data available to and why?

State authorities

In order to fulfill our regulatory duties, we can disclose data to competent authorities, e.g. in order to counteract terrorism and money laundering. In some cases, we are obliged, under legal regulations, to make your data available to external entities, judiciary authorities/law

enforcement authorities, such as the police, prosecutor's office, courts and arbitration/mediation bodies at their clear and lawful request.

Financial institutions

When you pay by a payment card, we have to make the information about you available to a financial institution such as Mastercard or Visa, e.g. Your first name and surname, address, payment card number.

Service providers

When we use other service providers' services, we make only the personal data that are required for the given order available. Service providers support us in such operations as:

- provision of specific services and performance of specific operations.

We take care to ensure that third parties have access solely to these personal data that are necessary to perform specific tasks.

Whenever we make your personal data available internally or to third parties in other countries, we apply the necessary protections in order to protect your data. In this regard, Fenige is based on:

- standard contractual clauses adopted within the European Union.

(they are concerned with data transfer by an entity within the boundaries of the EU outside the European Economic Area for the purpose of ensuring conformity of the EU data protection regulations).

5. Your rights and the way we observe them

The right to access information

You are entitled to apply to us in order to obtain a statement of the personal data that we process.

The right to amend data

If your personal data are incorrect, you have the right to apply to us for correcting them. If we make data about you available to a third party and the data are later corrected, we'll also notify the third party about this fact.

The right to file an objection against the processing

You can file an objection against using your personal data to us due to legitimate interests. You can do it online by sending an e-mail or to our office's address. We will analyze your objection and whether the processing of your information has any unwanted effect on you that requires us to stop such processing.

We will not be able to acknowledge your objection to the processing of the personal data in the following situations:

- if we are legally obliged to conduct such actions,
- if it is necessary for the purpose of performing the agreement concluded with you.

The right to restrict processing

You are entitled to apply to us for restricting the use of your personal data, if:

- you believe that the information is incorrect,
- we process the data unlawfully,
- we do not need such data anymore, but you want us to keep them in case of any claims,
- you object to our processing of your data due to legitimate interests and this objection has been acknowledged by us.

The right to transfer the data

You are entitled to apply to us for transfer of your personal data directly to you or to a different organization. This is concerned with the personal data that we process in an automated way and with your consent or on the basis of an agreement concluded between us. If it is technically possible, we will forward your personal data.

You can apply to us to remove your personal data, if:

- they are no longer necessary for us for the purposes which the data were collected for,
- you withdraw your consent to the processing thereof and we have no other basis for processing,
- you object to our processing of your data for our legally justified interests and there are no superior legitimate interests for the processing of the data and this objection has been acknowledged, or for the purpose of sending commercial messages,

we process your personal data not in line with the law or the regulations of the European Union or a member state of the European Union require us to remove your personal data.

The right to file a complaint

If you are not satisfied with the way we have responded to your concerns, you have the right of file a complaint in Fenige. If you are still not satisfied with our activities in reply to this complaint, you may hand it over to the Fenige data protection officer at the address indicated in item 10 of this statement.

6. How do we protect your personal data?

To protect your data, we apply internal policies and standards across our whole organization. These policies and standards are periodically updated, in order to maintain their continuous compliance with the regulations and changes on the market. In particular, as well as in accordance with the legal regulations, we apply appropriate technical and organizational measures (policies and procedures, IT safety measures etc.), to guarantee the confidentiality, integrity and availability of your personal data as well as the way they are processed.

In addition, our employees are subject to obligations regarding confidentiality and may not disclose your personal data or the methods of protecting your data not in line with the law or without a valid reason.

7. What can you do to make it easier for us to protect your data?

The protection of your data is our priority, we do our best, but there are some actions which you can take yourself:

- install antivirus software, anti-spyware and firewall software and keep this software updated,
- not to leave devices, payment cards unattended,
- immediately report to competent services and instantly reserve a lost card,
- always log out from portals, when you are not using them anymore,
- store passwords in strict confidentiality and use the so-called strong passwords, namely avoid obvious combinations of letters and digits,
- be watchful online and learn how to recognize any untypical activity, e.g. a new website address or messages used to extort your personal information.

8. How long do we store your personal data?

We can store your personal data only as long as necessary for the purposes which they were necessary for us at first. After that time, we use available solutions, e.g. archiving

9. Contact with Fenige

If you want to learn more about the policies regarding the data and about the way of using your personal data, you can contact us: by e-mail. At the end of this document there is

information about the contact details together with the data concerning data protection authorities.

10. Scope of the Privacy Statement

This document is Fenige sp. z o. o.'s Privacy Statement We can amend the Privacy Statement in order to maintain its conformity with any changes in legal regulations or to reflect the way the personal data are processed in our organization.

| Data Protection Officer's contact information | Data protection authority |
|---|--|
| iod@fenige.pl dpo@fenige.pl Promienna 10 Street, 03-672 Warsaw with the note DPO | Personal Data Protection Office https://uodo.gov.pl/ |