

## Privacy Policy of Autopay S.A.

The Privacy Policy is a place in which you will get to know who the controller of your personal data is, for what purpose, in what scope and for what period it shall be processed. Moreover, you will learn to whom and on what terms we can make your data accessible, as well as what rights you have in connection with the processing thereof.

This Privacy Policy has been drawn up so that you will find therein all necessary information required by 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 in force since 25 May 2018 (“GDPR”).

Any references made to the data below shall mean your personal data given to use by you or obtained by us from other sources e.g., first name and last name, email address or phone number.

Who is the controller of my personal data?	The controller of the personal data is Autopay S.A. with its registered office in Sopot at the address: ul. Powstańców Warszawy 6, registered in the District Court Gdańsk-Północ in Gdańsk, the 8th Commercial Division of the National Court Register under the number: 0000320590, with share capital in the amount of PLN 2,205,500 (paid in full), NIP [Tax ID. No.]: 585-13-51-185; entered into the register of payment services providers under the number IP17/2013, into the register of loan institutions under the number RIPO00109, into the register of credit agents under the number RPK002057, into the register of telecommunication entrepreneurs under the number 11050.
How can I contact you in matters related to the personal data?	The processing of our Customers' personal data is supervised by the Data Protection Officer appointed by us. You can contact him by email at the address: <a href="mailto:odo@autopay.pl">odo@autopay.pl</a> or in writing, to the following address: Autopay S.A., ul. Powstańców Warszawy 6, 81-718 Sopot, note: personal data protection.
In what situations do you process my personal data?	Your personal data is always processed if you benefit from our services, for example if through us you top up your phone, pay bills, pay for shopping on the Internet, apply for a credit in our company, represent your organization while signing an agreement, act as a person designated for contact or if you take part in competitions and promotional campaigns organized by us. Each and every time when you apply to us with your affairs or a complaint, we also process your personal data. Your personal data is also processed if we send to you marketing information about us or about our business partners. Sometimes, we also process your personal data if we are asked for it by other controllers of your data who render services for you, for example your bank or telephone operator.
Do I have to provide you with my data?	Provision of your data is voluntary but some of your data may be necessary to conclude the agreement and to correctly render our services or to meet the requirements set out in regulations of the law, which we must observe.

<p>What data do you process?</p>	<p>We process both data given by you and data which we have developed on our own (e.g., using cookies or other tools applied by us) or which has been made accessible to us or entrusted to us by other data controllers, e.g. your bank, other payment services providers, loan institutions, telecommunication operator or recipient of your payment. We also process data given to us by the device used by you while benefiting from our services (device fingerprint, cookies). We make sure to process only those data which is necessary for the purpose in which we collect it (data minimization).</p> <p>For example:</p> <ol style="list-style-type: none"> <li>1. If you top up your phone through us, we process, inter alia, data pertaining to your payments (bank account number, sender's data), phone number, in some cases: email address, name of Telephone operator.</li> <li>2. If you perform a transaction by means of our systems, we process, for instance, data concerning your payments necessary in the payment process (bank account numbers and data regarding the sender and recipient, transfer title), email address, device IP number from which you have ordered the transaction, in some cases (when required by separate regulations) precise data of the principal and actual beneficiary.</li> <li>3. If you benefit from credit services or other financing services offered by us, we process, inter alia, your first name and last name, address data, contact details, number and validity date of your identity document, data concerning your financial standing or data from a verification transfer. We can also process your data obtained by us in connection with rendering other services to you provided that there is still a valid legal basis for processing your personal data. For the purposes of a risk assessment, we can also process data delivered to us by your device or analyze the way in which you use it.</li> <li>4. If you take part in competitions organized by us, we process, inter alia, your contact details, address details, first name and last name, and in some cases also bank account number if you have won a pecuniary prize.</li> <li>5. If you contact us by phone or when we call you, we register the conversation, about which you are informed by us at the beginning thereof.</li> </ol> <p>If you represent your organization while signing an agreement or if you act as a person designated for contact, we process, inter alia, your first name, last name, official post, phone number, email address.</p>
<p>For what purpose do you process my data?</p>	<p>Your data is processed mainly for the purpose necessary to conclude and perform the agreement, including to handle complaints, for example the user account agreement, credit agreement and to verify your creditworthiness or payment service agreement or to take up actions upon your demand prior to conclusion of the agreement. If necessary, we can contact you out of our own initiative in technical matters, e.g. when you have a problem with activation of service or when we want to know your opinion about our services.</p>

	<p>Processing some of your data is also necessary for us to fulfil the obligations arising from legal provisions, and concerning e.g. the obligation to store some data for particular time, to collect some information for verification and identification of user, or to provide data to authorized bodies or entities, e.g. arising out of the Act on payment services, Act on consumer credit, Act on counteracting money laundering and terrorism financing, tax acts, Accounting act, Act on handling complaints by financial market entities and financial ombudsman, Act on the outof-court settlement of consumer disputes or Telecommunications law act.</p> <p>Your data is also processed for other, legitimate purposes, including:</p> <ol style="list-style-type: none"> <li>1. to monitor your activity in our services (e.g. by means of cookies and tools used by us),</li> <li>2. to profile your interests and needs (also by means of cookies) in order to address only those services to you, which may be of interest to you,</li> <li>3. for the purpose of direct marketing of our products or services - thanks to this, we can inform you about our offer,</li> <li>4. to get to know your opinion on the services rendered by us,</li> <li>5. to establish, pursue and defend potential claims by us, arising from the activity conducted by us,</li> <li>6. to monitor, prevent and detect potential frauds or other misuse committed via the services rendered by us,</li> <li>7. to assess the risk related to provision of some services by us,</li> <li>8. possibility of performing agreements with contracting parties and possibility of contacting in view of performance thereof.</li> </ol> <p>If you have given the consent to us, we can send to you our newsletter or contact you in matters related to new offers by phone, via email or mobile phone messages. If you take part in a competition or another promotional campaign organized by us, we process your data to organize the competition or promotion, to choose winners and to grant prizes.</p> <p>If you are interested in business offers of our Partners and if you have given the consent to receive them, we can send to you business messages on their behalf or make your data accessible to them so that they can send to you this information on their own.</p> <p>If we decide to process your data for a purpose other than the purpose in which we have collected it, we shall inform you about this fact and ask for your consent if it is required in accordance with regulations of the law.</p>
<p>On what legal basis do you process my data?</p>	<p>Legal basis for data processing includes:</p> <ol style="list-style-type: none"> <li>1. conclusion and performance of the agreement or</li> <li>2. consent given by you or</li> </ol>

	<ol style="list-style-type: none"> <li>3. implementation of legitimate interests of the controller or</li> <li>4. fulfilment of the obligations arising from binding regulations of the law by us, depending on the type of service rendered by us, for instance: <ol style="list-style-type: none"> <li>a) Act of 19 August 2011 on payment services,</li> <li>b) Act of 29 September 1994 on accounting,</li> <li>c) Act of 11 March 2004 on Value Added Tax,</li> <li>d) Act of 1 March 2018 on counteracting money laundering and terrorism financing,</li> <li>e) Act of 29 August 1997 - Banking Law,</li> <li>f) Act of 12 May 2011 on consumer credit,</li> <li>g) Act of 18 July 2002 on provision of services by electronic means,</li> <li>h) Act of 16 July 2014 - Telecommunications Law,</li> <li>i) Act of 5 August 2015 on handling complaints by financial market entities and on the financial ombudsman,</li> <li>j) Act of 23 September 2016 on the out-of-court settlement of consumer disputes,</li> <li>k) Act of 10 May 2018 on the protection of personal data.</li> </ol> </li> </ol> <p>Your data is processed in accordance with binding provisions pertaining to the protection of personal data, including the GDPR.</p>
<p>Why do you send emails to me?</p>	<p>You receive emails from us in the following cases:</p> <ol style="list-style-type: none"> <li>1. you have sent an email to our address and expect us to reply,</li> <li>2. you are a user of our service and we contact you in matters related to conclusion or performance of the agreement,</li> <li>3. we contact you to handle a complaint,</li> <li>4. you take part in a competition or another promotional campaign and we contact you in matters related to the course of the competition or action,</li> <li>5. we contact you upon our Partner's order,</li> <li>6. you have given a consent to receive business information about us or about our Partners,</li> </ol>

	<p>7. legal regulations order us to provide you with specific information, depending on the type of rendered service, for instance:</p> <ul style="list-style-type: none"> <li>a) information provided after receipt of your payment order by us within one-off cash transfer transaction (Article 24 of the Act on payment services),</li> <li>b) information provided after receipt of your payment order by us within the framework agreement for rendering a cash transfer payment service (Article 31 of the Act on payment services),</li> <li>c) information provided in connection with placement of a payment order within the payment transaction initiation service (Article 59q of the Act on payment services),</li> <li>d) information provided on the basis of the Act on consumer rights.</li> </ul> <p>If you find that you are not the intended addressee of the received message, please inform us about this fact via the notification form: <a href="https://pomoc.autopay.pl/kontakt/zgloszenie">https://pomoc.autopay.pl/kontakt/zgloszenie</a> and remove the message without opening the attachments.</p>
How long will you process my data?	<p>We will process your data as short as possible.</p> <p>For individual cases the data processing time is as follows:</p> <ul style="list-style-type: none"> <li>1. If we process your data based on the agreement, the processing will last until expiry of the agreement and until prescription of potential claims.</li> <li>2. If you have given your consent to the processing for a specific purpose, we will process your personal data by the time you withdraw your consent.</li> <li>3. The data processed by us within implementation of the legitimate interest will be processed as long as this period lasts. In special cases, i.e. processing of data for the purpose of direct marketing, including profiling, your data can be processed by the time you lodge an objection.</li> </ul> <p>The data processed for the purpose of fulfilment of the obligations arising from binding legal regulations by us will be processed as long as this results from the said provisions.</p>
Who will you make my data available to?	<p>We do not make your data accessible to third persons or third entities. The following situations are an exception to this rule:</p> <ul style="list-style-type: none"> <li>1. If you give your voluntary consent to such sharing. Your consent may be withdrawn at any time.</li> <li>2. If sharing is necessary for the purpose of rendering the service. Recipients of your data may be: <ul style="list-style-type: none"> <li>a) Operator - data necessary to top up a given device, e.g. telephone,</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>b) Bank or another payment service provider - data necessary to render the payment service,</li> <li>c) Economic and credit information bureaus - data necessary to obtain information about creditworthiness,</li> <li>d) Payment recipients - data accompanying your payment order,</li> <li>e) In special cases, your data may be made available to entities entitled to this based on generally binding provision of the law (e.g. law enforcement bodies, other payment service providers). Each and every request for sharing is thoroughly examined by us, and the data is provided only if as a result of this analysis we find that there is a significant and effective legal basis to demand disclosure of your data to these entities.</li> </ul> <p>At the same time, you must know that we benefit from assistance of external entities during performance of some tasks, e.g. destruction of documents, storage of data, marketing service. In such a case, we entrust the personal data to subcontractors for a specific purpose, still remaining the controller of your data and being responsible &amp; liable for security thereof. The operations we perform are carried out using computer networks, including cloud servers with third-party providers.</p> <p>We do not provide your data to third countries.</p>
<p>Will my data be subject to automated decisionmaking (including profiling)?</p>	<p>In the case of some services, we use automated decision-making processes.</p> <p>In the case of credit services or other financing services, decisions are made based on profiling which is necessary to conclude the agreement.</p> <p>These activities consist in a risk assessment and establishment of creditworthiness based on information given to us by you and information obtained by us about you, e.g. coming from economic and credit information bureaus, data delivered by your device or data from other services rendered to you by us or which we still render to you.</p> <p>In the case of negative assessment of creditworthiness, the consequence of profiling may be refusal to give you a credit or another form of financing.</p> <p>The automated decision-making, including profiling, also takes place for safety reasons of online payments or for the purpose of counteracting abuses in the case of rendering services, in particular payment and credit services.</p>
<p>How do you protect my data?</p>	<p>We bear full responsibility &amp; liability for security of your data processed by us.</p> <p>We apply appropriate technical and organizational security measures, aimed at ensuring confidentiality, protection against unauthorized or illegal processing, and against an accidental loss, destruction of or damage to your data. We protect your data mainly by applying the most modern technologies, not only complying with binding legal regulations but also applying additional solutions</p>

	<p>to ensure security of your data. The basic protection measure is the use of safe connections (e.g. SSL protocols), data encryption and application of other technical, programming or organizational solutions (e.g. limitation and control of access to the data).</p> <p>We guarantee that your data is processed solely by persons and entities authorized to this.</p>
<p>What are my rights?</p>	<p>Due to the fact that you entrust us with your personal data, we have obligations towards you, which you have the right to enforce from us:</p> <ol style="list-style-type: none"> <li>1. You have the right to receive information from us whether we process your personal data, for what purpose we process it, what categories of your data we have, what are the categories of recipients of your data and what is the storage period of your data planned by us.</li> <li>2. You have the right of access to the data processed by us, rectify incorrect data or to complete incomplete data.</li> <li>3. You can demand that the data processed by us be erased. Your demand shall immediately be realized by us provided that we are not obliged by legal regulations to further processing of your data, if the obligation which we must fulfil does not result from legal regulations, when your personal data is not necessary for us to establish, pursue or defend claims or there is no other legitimate interest which justifies further data processing. Your data shall be erased by us if: <ol style="list-style-type: none"> <li>a) it is no longer necessary for the purposes for which it has been collected or otherwise processed,</li> <li>b) we have processed it based on the consent given by you and which you have withdrawn, and there is no other legal basis for data processing,</li> <li>c) you have objected to the processing of your data within the implementation of the controller's legitimate interest, and at the same time there are no other circumstances which justify further data processing,</li> <li>d) the personal data has been processed unlawfully,</li> <li>e) the personal data must be erased due to the obligation arising from legal regulations.</li> </ol> </li> <li>4. You can at all times withdraw the consent to the processing of your data by us if the basis of processing it is the consent given by you. Thus, the data processing will be legal by the time of withdrawal of the consent by you.</li> <li>5. You have the right to request the restriction of your data processing from us if: <ol style="list-style-type: none"> <li>a) you report that the data processed by us is incorrect; the restriction takes place by the time allowing for verification whether the data is correct,</li> <li>b) there is no legal basis for the processing, and you object to the definite erasure of your data,</li> <li>c) we no longer need your data for the purposes for which we have collected it, however you need it for the purpose of defending your interests or for pursuing claims,</li> <li>d) you have lodged an objection to the processing of your data; the restriction takes place by the time of establishing whether there is no processing basis having priority over your objection.</li> </ol> </li> <li>6. You have the right to lodge an objection to the processing of the data by us within the implementation of the controller's legitimate interest.</li> </ol>

	<ul style="list-style-type: none"> <li>a) We shall immediately cease such processing provided that there is no basis having priority over the lodged objection.</li> <li>b) Your objection shall be taken into consideration at all times with reference to the data processing for the purpose of direct marketing, including profiling, to the extent that the profiling is related to such direct marketing.</li> </ul> <p>7. Please be informed that as a result of exercising the rights indicated in points 3-6 above by you, it is possible that we will cease rendering some services to you (in their entirety or in part) for the provision of which it is necessary to process particular personal data of yours.</p> <p>8. You have the right to obtain your personal data delivered to us by you, in the machine readable format, and to transfer this data to another controller. This refers to the data processed in an automated manner:</p> <ul style="list-style-type: none"> <li>a) data which we process based on the consent given by you, or</li> <li>b) data which we process based on the agreement concluded with you.</li> </ul> <p>9. If you think that your rights have been violated, you can lodge a complaint with a supervisory authority, the President of the Personal Data Protection Office.</p> <p>10. You have the right not to be subjected to the automated decision-making process, including profiling, if such activities give rise to legal consequences towards you or have another significant impact on you. However, you can use the automated decision-making process if such a decision:</p> <ul style="list-style-type: none"> <li>a) is necessary to conclude or perform the agreement,</li> <li>b) is permitted under separate legal regulations or</li> <li>c) take place after giving the consent by you.</li> </ul> <p>11. If you are subjected to the automated decision-making process, including profiling, you have the right to obtain assistance from our staff member who will additionally verify your situation and decision made, you can present to us your standpoint or challenge the decision made.</p>
What are cookies?	Cookies are IT data, in particular small text files saved and stored in a given device via which you use our online services.
How do you use cookies and similar technologies?	<p>We use files of the cookies type and similar technologies for the purpose of storing information or gaining access to information which is stored in a given device via which you use our services. Thanks to cookies, we can adapt the services to your individual preferences, as well as to profiling and monitoring of your activities in our services.</p> <p>Cookies used by us are safe for your devices, are free from viruses or unwanted software.</p> <p>Cookies contain a name of domain from which they come, time of their storage on a given device and assigned value. These files do not allow, in any case, to collect any information from your device, but they only allow to access particular information.</p>



<p>What is the types of cookies?</p>	<ol style="list-style-type: none"> <li>1. We use different type of cookies - they differ from each other in terms of type and durability. These files can be divided in terms of time of storage thereof on your device into:             <ol style="list-style-type: none"> <li>a) session cookies - are stored on your device and remain there by the end of a session of particular browser. Saved information is, then, permanently deleted from device's memory,</li> <li>b) persistent cookies - are stored on your device by the time of deletion or expiry thereof, thus the end of a session of a browser will not result in erasure thereof from your device.</li> </ol> </li> <li>2. Cookies used by us can also be divided in terms of origin into:             <ol style="list-style-type: none"> <li>a) own cookies - are placed in services directly by us,</li> <li>b) external cookies - placed in services by external entities whose components of pages have been evoked by us (e.g. Google Analytics, Gemius SA, Crazy Egg).</li> </ol> </li> </ol>
<p>For what purpose do you use the cookies type technologies?</p>	<p>We use cookies e.g., for the following purposes:</p> <ol style="list-style-type: none"> <li>1. configuration of the services, including adaptation of their contents or functionality to your preferences and optimization of the services,</li> <li>2. authentication of Users of our services to maintain a session after logging in - this allows to move between subpages of the services without the necessity to log in each time,</li> <li>3. creation of anonymous statistics which allow us to analyze in what way our services are used - thanks to this we can work on improvement of their structure and contents,</li> <li>4. acquisition of information about a source from which a given person has got to our website (e.g. advertising banner displayed in a website of third party),</li> <li>5. adaptation of advertisements presented via the services, 6. ensuring the security and reliability of the services.</li> </ol>
<p>In what way can I manage the consent to use cookies by us?</p>	<p>Using cookies for the purpose of storing information or gaining access to information stored on your device is possible solely if you give a prior consent to this unless storage or gaining access to information is necessary for rendering the telecommunication service demanded by you or service rendered by electronic means - in such a case, your consent is not required.</p> <ol style="list-style-type: none"> <li>1. The consent may be given by you by means of settings of the software used to benefit from the services, e.g. by means of settings of a web browser used by you or settings of device software used by you.</li> </ol>

2. You may not give the consent or may withdraw it at all times by changing relevant settings of a web browser or software installed in a given device used by you.
3. In many cases software, making it possible to benefit from our services (mainly web browsers), by default allows support and storage of Cookie files on your device. Therefore, we recommend that you should check settings or make changes consistent with your privacy preferences. Please remember that you can change settings in such a way as to block automatic support of Cookie files.
4. If you give your consent so that settings of the software used by you will enable support of Cookie files, we understand that in this way you have given your consent to use them in accordance with the principles described in the present Privacy Policy. Should this be the case, we shall be entitled to use Cookie files and similar technologies to store information or gain access to information stored in your device.
5. If you decide to turn off the support of Cookie files, you may find it difficult to use some functionalities of our services.

While rendering the telecommunication services or services by electronic means, we can also install software on your device or use this software. However, we will inform you about this fact prior to its installation and will ask you for your consent to installation and use thereof.