

Autopay System Privacy Policy

Review date: August 16, 2023

Dear User!

We care about your privacy and we want to make sure you feel comfortable when using our services. Therefore, below you will find the most important information about the processing of your personal data within the Autopay System ("System"), which consists of the mobile Autopay application ("Application") and the website Autopay service and application, available at <https://autopay.pl/> ("Website"). This document also contains information about the cookies used by the Website.

This information has been prepared in compliance with the GDPR – the General Data Protection Regulation.

DATA CONTROLLER

Autopay Mobility spółka z ograniczoną odpowiedzialnością

ul. Złota 3/18

00-019 Warszawa

entered into the National Court Register – Register of Entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, 12th Commercial Division of the National Court Register, under the KRS number: 0000794787, with the following NIP (Tax Identification Number): 5272898696, REGON (National Official Business Register Number): 383879060, and share capital of PLN 19,296,959.00.

If you want to contact us in connection with the processing of your personal data, you can send a message to our Data Protection Officer – Anna Pozorska, using the following email address:

dpo@autopay.pl.

YOUR RIGHTS

We process your data for the purposes related with the functioning of the System and the provision of the services offered within the System. With regard to the processing, you have the right to request:

- access to your personal data, including a copy of your data (Article 15 of the GDPR or – if applicable – Article 13(1)(f) of the GDPR);
- rectification of your data (Article 16 of the GDPR);
- removal of your data (Article 17 of the GDPR);
- restrictions in the processing your data (Article 18 of the GDPR);
- transfer of your data to another controller (Article 20 of the GDPR).

You also have the right to:

- object to the processing of your data at any time:
 - in relation to your particular situation – to the processing of your personal data under Article 6(1)(f) of the GDPR (i.e. the processing on the basis of our legitimate interests), including profiling (Article 21(1) of the GDPR);
 - in case the personal data is processed for the purposes of direct marketing, including profiling, to the extent that the processing is related to such direct marketing (Article 21(2) of the GDPR).

Please contact our Data Protection Officer if you wish to exercise your rights.

You can express your objection to our use of cookies (described below), particularly by using the widget available at the bottom left corner of the Website and in the banner displayed when you first visit the Website, or by using appropriate browser settings.

Moreover, if you want to delete an account in our System, you can do it via the Application using the function intended for this purpose.

If you believe that your data is being processed in a way that is against the law, you can submit a complaint to the authority competent for the protection of personal data. In Poland, this is the President of the Personal Data Protection Office.

PERSONAL DATA AND PRIVACY

Below you will find detailed information on the processing of your data depending on the actions you may take.

1. Setting up an account or using our services – part 1

| Why? | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| So that you can use the functionalities of the Autopay services | |
| On what grounds? | |
| Service agreement (Article 6(1)(b) of the GDPR) | Our legal obligation (especially related to accounting in case you use paid services) that requires us to process your personal data (Article 6(1)(c) of the GDPR) |
| For how long? | |
| Until the termination of the service agreement | Until the legal obligation expires |
| <i>Furthermore, your data will be processed until the expiry of the validity period for claims (yours or ours) (See the last table of this section for more information)</i> | |
| What happens if I do not provide my data? | |
| You will not be able to use the Autopay service | |

2. Setting up an account or using our services – part 2

| Why? |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To adjust our services to the needs of Users, as well as improve their quality thanks to the opinions collected from our Users as part of the satisfaction survey |
| On what grounds? |
| Our legitimate interest consisting in the processing of your data to measure customer satisfaction levels (Article 6(1)(f) of the GDPR) |
| For how long? |
| Until the expiration of the validity period for claims or until we have considered your objection to the processing of data* |

*Furthermore, your data will be processed until the expiry of the validity period for claims (yours or ours)
(See the last table of this section for more information)*

What happens if I do not provide my data?

We will not take into account your opinion regarding our services while working on their further development

* depending on whichever is applicable in each case

3. Getting in touch with us (e.g. to ask a question)

Why?

To handle your inquiries or notifications

On what grounds?

Agreement or actions taken at your request in order to conclude the agreement (Article 6(1)(b) of the GDPR) – if your inquiry or notification relates to the agreement to which we are or may become a party

Our legitimate interest in processing your data for the purposes of communicating with you (Article 6(1)(f) of the GDPR) – if your inquiry or notification is not related to any agreement

For how long?

For the duration of the agreement that binds us, or – if no agreement has been concluded – for a period of 36 months in the case of data provided in the course of a telephone conversation

For a period of 36 months in the case of data provided in the course of a telephone conversation or until we have considered your objection to the processing*

*Furthermore, your data will be processed until the expiry of the validity period for claims (yours or ours)
(See the last table of this section for more information)*

What happens if I do not provide my data?

We will not be able to respond to your inquiry or application

* depending on whichever is applicable in each case

3. Browser settings (in case of the Website) or other similar action to allow for marketing activities

Why?

Direct marketing, i.e. personalized ads
(You can read more on this subject in the "Profiling" and "Cookies" sections of the Privacy Policy)

On what grounds?

Our legitimate interest in processing data for the above-mentioned purpose
(Article 6(1)(f) of the GDPR)

For how long?

Until the expiry of the marketing cookies or until you delete them or express your objection in a different way*

What happens if I do not provide my data?

You will not receive suggestions regarding products or services that you may be interested in

* depending on whichever is applicable in each case and whichever comes sooner

4. Browser settings (in case of the Website) or other similar action to allow for analytical activities

Why?

Analysis of the way you use our services and navigate the System: in order to adjust them to the needs and behavior of Users
(You can read more on this in the "Analytical activities", "Profiling" and "Cookies" sections of the Privacy Policy)

On what grounds?

Our legitimate interest in processing data for the above-mentioned purpose
(Article 6(1)(f) of the GDPR)

For how long?

Until the expiry of the analytical cookies or until you delete them or express your objection in a different way*

What happens if I do not provide my data?

We will not consider your preferences regarding the use of the System or our services

* depending on whichever is applicable in each case and whichever comes sooner

5. Newsletter subscription

Why?

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To send a newsletter |
| On what grounds? |
| Newsletter subscription agreement (Article 6(1)(b) of the GDPR) |
| For how long? |
| Until you unsubscribe from our newsletter |
| <i>Furthermore, your data will be processed until the expiry of the validity period for claims (yours or ours) (See the last table of this section for more information)</i> |
| What happens if I do not provide my data? |
| You will not be able to receive information about the System and our services |

6. Your consent to receive marketing content from us (e.g. information about special offers)

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Why? |
| To send marketing information, particularly special offers |
| On what grounds? |
| Your consent to our marketing activities (Article 6(1)(a) of the GDPR) |
| For how long? |
| Until you withdraw your consent – please note that you can withdraw your consent at any time. The processing of data until you withdraw your consent is legal. |
| <i>Furthermore, your data will be processed until the expiry of the validity period for claims (yours or ours) (See the last table of this section for more information)</i> |
| What happens if I do not provide my data? |
| You will not receive our marketing materials, including information about our special offers |

7. Your consent to the transfer of your personal data to our trusted Partners so that they can provide you with marketing content (e.g. information about special offers)

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Why? |
| To accept your consent and forward it to our Partner |
| On what grounds? |
| Our legitimate interest consisting in the processing of data for the above-mentioned purpose (Article 6(1)(f) of the GDPR) |
| For how long? |
| Until we have considered your objection to the processing* |
| <i>Furthermore, your data will be processed until the expiry of the validity period for claims (yours or ours) (See the last table of this section for more information)</i> |
| What happens if I do not provide my data? |
| You will not receive marketing materials from our trusted Partners |

8. Taking part in surveys regarding your customer experience

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| Why? |
| To adjust our services to the needs of Users, as well as improve their quality |
| On what grounds? |
| Our legitimate interest consisting in the processing of your data to measure customer satisfaction levels (Article 6(1)(f) of the GDPR) |
| For how long? |
| For the duration of the agreement or until we have considered your objection to the processing* |
| <i>Furthermore, your data will be processed until the expiry of the validity period for claims (yours or ours) (See the last table of this section for more information)</i> |
| What happens if I do not provide my data? |
| We will not take your opinion on our services into account in the further development of those services |

* depending on whichever is applicable in each case and whichever comes sooner

9. Action or omission that may result in claims related to the System

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|-------------------------------------------------------------------------------------------------------------------------------------|
| Why? |
| To establish, exercise or defend any potential claims related to the System |
| On what grounds? |
| Our legitimate interest consisting in the processing of personal data for the above-mentioned purpose (Article 6(1)(f) of the GDPR) |
| For how long? |
| Until the expiration of the validity period for claims or until we have considered your objection to the processing* |
| What happens if I do not provide my data? |
| It will not be possible to establish, exercise or defend claims |

* depending on whichever is applicable in each case and whichever comes sooner

ANALYTICAL/STATISTICAL ACTIVITIES

We conduct analytical activities within the System aimed at increasing its intuitiveness and accessibility – such activities will be carried out in relation to you if you agree (e.g. through a widget for managing cookie preferences or the appropriate settings of your browser). In the analysis, we will consider the way you navigate the Website and use the Application – e.g. how much time you spend on a given page or where you click. Based on such aggregate information obtained from our Users, we can adjust the layout and appearance of the System and the content posted therein to the needs of the Users.

If you use our services, based on your way of using them, we can also conduct statistical activities aimed at examining which groups of Users decide to use our services and how they use the System. Based on such aggregate information, we can make decisions on the direction of development of our offer.

PROFILING

We perform profiling within the System – it will be carried out in relation to you if you allow it (e.g. through the appropriate settings of your browser).

The profiling we perform consists in an automatic assessment of what products or services you may be interested in, based on the information about the content you displayed. As a result, the ads of products or services displayed in the online services that you use will be more suited to you and your needs.

We can also automatically evaluate what products or services you may be interested in, based on the data you enter into the Autopay application, and send offers adjusted to your needs (if we establish the appropriate legal basis to do so).

In addition to the above, we can improve the operation of the Autopay application in relation to your account, so that it is adjusted to your preferences that will be determined automatically based on how you have used the application thus far. Such improvements may consist, for example, in the automatic adjustment of the display of individual application functions, so that the ones you use most frequently are better accessible (visible) to you.

The described profiling does not lead to making decisions which would have legal effects for you or would affect you in any similarly relevant way.

DATA SECURITY

When processing your personal data, we use organizational and technical measures compliant with the applicable law, including encrypting the connection with the use of an SSL certificate.

COOKIES

Our Website, like most websites, uses the so-called cookies. These files:

- are saved in the memory of your device (PC, mobile phone, etc.);
- do not change the settings of your device.

The Website uses cookies for the following purposes:

- to remember your session;
- for statistical purposes;
- for marketing purposes;

- to ensure the availability of the Website's functions.

More information on the cookies we use can also be found in the widget available at the bottom left corner of the Website and in the banner displayed when you first visit the Website.

To learn how to manage cookies and disable them in your browser, you can use your browser's help file. You can find more information on this subject if you press the F1 key while using the browser. Additionally, you can find relevant tips on the following pages, depending on the browser you use:

- Google Chrome
- Opera
- Safari
- Mozilla Firefox
- Microsoft Edge

Below you will find information about the functions of the cookies we process and their duration.

| Cookie name | Maximum cookie duration | Cookie function |
|----------------------------------|--------------------------------------|--------------------------------------------------------------------------------------------------|
| Session | Browser session duration | To maintain the session of a non-logged in user. |
| Settings | Unlimited | To save user preferences for an application, e.g. language settings. |
| Facebook | 3 months | It is used to store and track visits between sites to target ads at people who visited our site. |
| Google Analytics | 2 years | It is used to analyze how the users use the Website. |
| Mobile app: Application settings | Until the Application is uninstalled | It is used to remember user settings. |
| Mobile app: Telephone number | For the duration of the session | To improve the processes of the Application |

You can do the following at any time, using the appropriate options of your browser:

- delete cookies,
- block the use of cookies in the future.

In such cases, we will no longer process them.

You can find more information on cookies here: [Wikipedia](#).

EXTERNAL SERVICES / DATA RECIPIENTS

If you use the services offered by external suppliers available in the System, we will transfer your data to these entities, which is necessary for the provision of these services. These entities are separate data controllers and process your data on the terms specified by them.

We use the services of third parties that support us in running our business. We entrust them with the processing of your data – these third parties process data only at our documented request. Below you will find a list of the recipients of your data:

| ACTION | DATA RECIPIENTS | TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| Any action in connection with the System | Hosting providers | Yes – United States** |
| | Data warehouse provider | Does not apply |
| | Technical/IT support provider | Does not apply |
| | CRM software provider | Does not apply |
| | Provider of the data protection officer service | Does not apply |
| | Blue Media S.A. ul. Powstańców Warszawy 6 81-718 Sopot KRS: 0000320590 NIP (Tax Identification Number): 5851351185 REGON (National Official Business Register Number): 191781561 | Does not apply |

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| | Person cooperating with us under civil law agreement and supporting our current activity | Does not apply |
| Staying within the System with settings allowing for marketing activities | Marketing service provider | Yes – United States** |
| Staying within the System with settings allowing for analytical activities | Facilitator of System optimization | Yes – United States** |
| Getting in touch with us (e.g. to ask a question) | Hosting and e-mail service provider | Yes – United States** |
| | E-mail security and management provider | Yes – United States** |
| | Project management software provider | Yes – United States** |
| | Standard office and communication software provider | Yes – United States** |
| | Voice bot provider | Does not apply |
| | Provider for secure destruction of hard copies | Does not apply |
| | Chatbot provider | Does not apply |

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| Setting up an account or using our services | The owner or the third party managing the motorway, car park, or other area covered by the service provided through the Autopay application | Does not apply |
| | Supplier, including in particular the owner or the third party managing the devices (including cameras) and software for automatic reading of vehicle registration plate numbers, and the sending of such data to the Autopay application | Does not apply |
| | Regarding the E-Winieta service: The competent authority of the country where the E-Winieta authorizes passage, as the authority entitled to collect the toll and as the controller of the data included in the E-Winieta | Does not apply |
| | Regarding the e-TOLL service: The Head of the National Revenue Administration as the entity authorized to collect electronic toll using the National Revenue Administration's Electronic Toll Collection System (hereafter "SPOE KAS") and as the controller of data contained in the register of entities paying electronic toll together with entities providing indirect services to SPOE KAS customers | Does not apply |
| | Regarding the e-TOLL service: Entity providing the warranty and postwarranty services for the OBU device purchased on the Website | Does not apply |

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| | <p>Regarding the Shopping Assistance Service:</p> <p>The entity operating the online shop where you place an order (including making a payment) using the Shopping Assistance Service.</p> <p>Due to the nature of the service, Autopay obtains from the aforementioned entity information about the order (its subject matter and value) and Autopay transmits to the aforementioned entity your contact details available in the Application necessary for the fulfilment of the order placed in the shop (in particular for the delivery of the product).</p> | Does not apply |
| | Payment system provider (Blue Media S.A.) | Does not apply |
| | Financing service provider | Does not apply |
| | Accounting office | Does not apply |
| | Accounting software provider | Yes – New Zealand*** |
| | Standard office and communication software provider | Yes – United States** |
| | Hosting and e-mail service provider | Yes – United States** |
| | E-mail security and management provider | Yes – United States** |
| | Project management software provider | Yes – United States** |
| Provider of electronic communication software, including e-mails | Yes – United States** | |

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|--------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|-----------------------|
| | Voice bot provider | Does not apply |
| | Mobile operator | Does not apply |
| | Bank | Does not apply |
| | Provider for secure destruction of hard copies | Does not apply |
| | Satisfaction survey provider | Does not apply |
| Your subscription to the newsletter or your consent to receive marketing content from us (e.g. information about special offers) | Marketing service provider | Does not apply |
| | Provider of software for sending marketing communications, including emails | Yes – United States** |
| | Hosting and e-mail service provider | Yes – United States** |
| | E-mail security and management provider | Yes – United States** |
| | Project management software provider | Yes – United States** |
| | Standard office and communication software provider | Yes – United States** |
| | Provider for secure destruction of hard copies | Does not apply |
| Your consent to the transfer of your personal data to our trusted Partners so that they can provide you with marketing content (e.g. | Our trusted Partners | Does not apply |

| | | |
|--------------------------------------------------------|---------------------|-----------------------|
| information about special offers) | | |
| Your use of services provided to us by social networks | Networking platform | Yes – United States** |

additionally: Competent public authorities to the extent to which we are required to provide them with data.

TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION

For the above reasons, your personal data may also be processed by third parties outside the European Union. The following will ensure the appropriate level of the protection of your data, including appropriate safeguards:

** participation of these third parties in the so-called Data Privacy Framework, a program established by the European Commission Implementing Decision as a set of principles guaranteeing adequate protection of your privacy – in the case of entities from the United States of America;

*** Commission Implementing Decision 2013/65/EU on the adequate protection of personal data by New Zealand.