



DATA PRIVACY POLICY

1. INTRODUCTION

1.1. This Data Privacy Policy describes the way in which a company under the name Kredyt Karma spółka z ograniczoną odpowiedzialnością (limited liability company) with registered office in Warsaw (hereinafter referred to as **KKarma**) shall use the personal data and other information of people interested (hereinafter referred to as **User**) in Services provided by KKarma (hereinafter referred to as **Services**) as well as Users rights regarding the data provided to KKarma.

1.2. The detailed description of the Services provided by KKarma can be found in the Rules and Regulations for the Provision of Services (hereinafter referred to as **Regulations**), available on a website kkarma.pl

1.3. The controller of the entrusted personal data, in order to provide Services to the User, is the company under the name Kredyt Karma spółka z ograniczoną odpowiedzialnością (limited liability company) with its registered office in Warsaw (postal code: 00-023) at Widok Street 16/27, having NIP No. (Tax ID No.) 5252736393, entered into the register of entrepreneurs of the National Court Register kept by the District Court for the capital city of Warsaw, 12th Commercial Division of the National Court Register, under KRS No. (National Court Register No.) 0000714038, having share capital of PLN 5.000.

1.4. To contact the Data Protection Officer of KKarma, correspondence shall be send to an e-mail address privacy@kkarma.pl or to Company's address indicated above.

2. PURPOSE OF PERSONAL DATA PROCESSING

2.1. KKarma processes personal data of the User, to provide assessment of his or her financial viability and the credit profile.

2.2. The assesment of the User's financial viability shall be made on the basis of personal data provided to KKarma by the User via the website or a mobile application, but also based on data obtained from the banking systems upon the User's consent.

2.3. Upon the User's consent, KKarma shall submit to the selected creditors and counterparties of KKarma (hereinafter referred to as **Partners**) the assessment of the

financial viability and personal data of the User in order to present the offer of a loan/a credit.

3. EXTENT OF PERSONAL DATA PROCESSED BY KKARMA

3.1. KKarma processes the following information, provided by the User or obtained by KKarma for the purpose of Services:

3.1.1. Identity and contact details: PESEL number, name and surname, address, age, sex, telephone number, e-mail address.

3.1.2. Financial information: name of the User's bank, bank account number, number of the bank accounts, transaction history from the last 24 months including transfers which were carried out and received (the amount, beneficiaries, titles, the dates of the transactions), loans and mortgages taken out, paid remunerations, expenses and balances,

3.1.3. Technical information related to the electronic device used by the User who uses the KKarma's Services, in particular the types of the device and the web browser, IP address, the operating system;

3.2. Within the conducted operating activity, KKarma do not process sensitive data within the meaning of RODO (GDPR).

4. SOURCE OF DATA

4.1. Identity and contact details as well as technical information originate from User's account on the KKarma online portal;

4.2. Upon the User's consent, financial information is collected from the Internet bank/banks systems of the User, which were indicated while using Services;

5. MEANS OF THE PROCESSING THE USER'S PERSONAL DATA

5.1. All of the User's data is processed in accordance with this Data Privacy Policy and the applicable legal provisions, in particular with 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, and repealing Directive 95/46/EC (General Data Protection Regulation) (OJ EU L 199, p.1), (**hereinafter referred to as GDPR**) and the Payment Services Act, for the following purposes:

5.1.1. By creating the profile on the online portal kkarma.pl, the User consents for process of the personal data for the purpose of Services by KKarma. The given consent also covers detection and elimination of technical errors, maintaining and optimising of the quality, maintaining security of Services, preventing and investigating of illegal actions against the Services and compliance with the Regulations. Technical information may also be used for the analysis and improvement of Services.

5.1.2. The User's data may be transferred by KKarma to the competent public authorities, in particular but not limited to Courts and Prosecution Offices, only to maintain

compliance with applicable legal provisions and if the requirement for transferring such data shall arise from a notice, order, judgment or different document of a similar nature delivered to KKarma.

5.1.3. The User's data shall also be processed by KKarma for marketing purposes in order to send and display the proper advertisements and offers on the User's profile.

6. SHARING THE USER'S PERSONAL DATA WITH THIRD PARTIES

6.1. Personal data processed by KKarma may be disclosed to the following categories of recipients:

6.1.1. Partners, for which the User has given consent to share data. After disclosing of the User's data to Partners, the liability for further processing of the User's data shall lie on these entities.

6.1.2. Other Companies which are the part of capital groups to which KKarma belongs, as well as their successors in title. Upon the User's prior request, KKarma shall share a list of affiliated companies among the same capital group.

6.1.3. Subcontractors, with whom KKarma cooperates to ensure the best quality of Services, as well as entities providing services directly to KKarma, in particular **suppliers of the required technical and IT infrastructure, suppliers of accounting, legal and other services.** The User's personal data shall be shared with the above entities only to the extent in which it is necessary for the implementation of the provided Services.

6.1.4. Law enforcement authorities and other external entities, if such a requirement results from the legal provisions, in response to notice, order or judgment provided by these entities.

6.1.5. While maintaining the full anonymity of the User's Data (which prevents the User from being identified as a specific natural person), this data may be used by KKarma for marketing purposes.

7. SHARING THE USER'S DATA WITH THIRD PARTIES LOCATED OUTSIDE POLAND

7.1. Some of the third parties described in section 6 are or may be located outside Poland, including places outside the European Union or European Economic Area. In such event, KKarma shall take all necessary actions to ensure the compliance of sharing and transferring data process to these entities, with the applicable law. KKarma commits in particular to:

7.1.2. apply appropriate contractual clauses adopted by the European Commission,

7.1.3. make sure that the recipient of transferred data has proper certificates (like certificate of compliance with EU-US Privacy Shield Framework);

8. RETENTION PERIOD OF THE USER'S PERSONAL DATA

8.1. The User's personal data shall be retained only in the period of time required to provide the Services properly, which usually shall take place within 90 days.

8.2. If the applicable tax, accounting or HR laws require longer retention period of data, the User's data shall be retained within the shortest period of time required by those laws.

8.3. When further retention of the User's personal data becomes unnecessary for the purposes for which the data had been collected, it shall be erased or made anonymous.

8.4. The User's personal data may be retained by KKarma on behalf of its Partners, not for the purpose of the Services (see section "Processing performed as the data controller").

9. SECURITY MEASURES

9.1. KKarma is obliged to protect the User's personal data and to take all necessary actions to maintain its security status and to prevent unauthorised access to it or its use.

9.2. As a rule, any personal data retained by KKarma shall be treated as confidential and its transfer shall be performed with the use of SSL protocol (Secure socket layer) and security encryption protocols.

10. AGE LIMITATIONS

10.1. Persons under 18 years old are not entitled to use the KKarma's Services.

10.2. KKarma shall not process any data obtained unwillingly from minors which were acting without the adult's approval.

10.3. If it emerges that KKarma obtained the data concerning minors, shall all necessary actions be taken to delete such person's data, unless the relevant authorities (see section 6.1.4.) shall commit KKarma to different actions in connection with possessed data of the minor.

11. USER RIGHTS

11.1. Due to enforcement of GDPR, the User has the number of rights against KKarma with regard to processing the User's personal data.

11.1.1. Withdrawal of consent: The User has the right to withdraw the consent to process his data. The withdrawal of consent does not influence the lawfulness of the acts regarding processing of the data which had been performed before the consent's withdrawal. In some cases, KKarma may have a legal basis for processing the User's data and therefore, despite withdrawal of consent, may be entitled to further processing.

11.1.2. Right of access: In every moment, the User is entitled to receive the information on the personal data retained by KKarma and on how it is processed.

11.1.3. Right of rectification and restriction: The User has the right to have his data rectified, when it is incorrect or inaccurate. Furthermore, the User has the right to demand from KKarma to restrict the scope of the User's data being processed. This shall be applied to situations where:

11.1.3.1. The User questions the accuracy of personal data collected by KKarma,

11.1.3.2. the scope of personal data provided by the User is no longer needed by KKarma for the purposes of processing it.

11.1.4. Right to delete: The User has the right to delete his personal data immediately, in particular, if this data is no longer needed for the purposes described in this document. KKarma shall not be obliged to delete the User's personal data, if it can be proved that its processing is necessary to continue providing Services to the User or to satisfy the competent authorities or relevant provisions of law.

11.1.5. Right to object: The User has the right to object to KKarma's processing of his personal data. In such situation, KKarma shall no longer be entitled to process the User's personal data on a given legal basis, unless KKarma has valid legitimate grounds for the processing which take precedence over interests, rights and freedom of an objector, or has the grounds for determining, claiming or defending of the claims.

11.1.6. Right to transfer data: The User has the right to receive the personal data about himself and the one which he provided to KKarma in a structured, commonly used machine-readable format and has the right to transfer such data to another controller of data.

11.2.1. If the User wishes to receive the information regarding the personal data processed by KKarma or wishes to use any of the aforementioned rights or to withdraw consent, the User may contact KKarma at the following e-mail address privacy@kkarma.pl or dataprotection@kkarma.pl

11.2.2. If the User has objections to the manner his personal data is being processed, he may lodge a complaint to the Personal Data Protection Office: Office of the President of the Personal Data Protection Office, at Stawki Street 2 (postal code: 00-193) Warsaw, Poland, telephone number (22) 531 03 00, Fax (22) 531 03 01, e-mail address: kancelaria@uodo.gov.pl

12. PROCESSING PERFORMED AS THE DATA CONTROLLER

12.1. As a part of its activities, KKarma shall retain the User's data on the Partner's request, which the User consented to provide to the Partners.

12.2. KKarma provides the retaining data Service to Partners and in such case shall not use this data for its own purposes and the provided Service is to facilitate the decision making process for Partners regarding potential cooperation with the User.

12.3. In this case, Partners shall be liable for processing User's personal data in compliance with applicable legal provisions and have the right to delete certain data from the KKarma's database at any time. During processing the User's personal data, Partners (in other words, entities for which the User consented to share data) are controllers of this data. In such case, KKarma shall act for the benefit of the Partner on the basis of personal data entrusting agreement.

12.4. If the User wants to withdraw the consent of the Partner, to whom the Personal Data was provided, to process such data, he shall report it directly to this Partner.

13. USE OF COOKIES ("cookies")

The website www.kkarma.pl uses cookies („cookies”). They identify the User’s web browser and make the website more effective. In the settings of the browser, the option of disabling cookies can be chosen but some of the website’s options may not function correctly. Cookies do not contain any personal data.

14. FINAL PROVISIONS

14.1. KKarma shall reserve the right to update and change this Data Privacy Policy in situation when it is needed. Before any significant changes are made, information on its introducing shall be found on the website www.kkarma.pl

14.2. In the event of any operational or threatening action to the security of collected Users’ data, the information in this regard shall appear on the website of KKarma. If the User prefers to be informed about such event via other means of communication, he shall contact with KKarma at the following e-mail address: privacy@kkarma.pl

14.3. More information on KKarma and its services can be found on the website www.kkarma.pl