

This version of the Privacy Policy is effective as of November 1, 2021.

## **PRIVACY POLICY OF MONEDIUS**

We, MONEDIUS SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ, a private company limited by shares registered in the Republic of Poland with KRS number 0000897902, REGON: 388870430, legal address ul. Mokotowska, nr 15A, lok. 1B, miejsc. Warszawa, kod 00-640, poczta Warszawa, kraj Polska (hereinafter referred to as – “we”, “us”, “our”), take care of your personal data, and in this policy we explain how personal data of individuals are processed in or via the website <https://monedius.com/> (hereinafter referred to as - the “Website”).

### **I. WHAT INFORMATION DO WE COLLECT?**

#### **1. If you are a natural person:**

**Identification information:** Name, surname, date of birth, ID card or passport number, validity term, copy of ID card or passport, password on the Website.

**Contact information:** phone number, e-mail address.

**Other information about you:** country and address of tax residence, tax certificate, tax identification number.

**Anti-money laundering related information:** the origin of funds, the status of the politically exposed person, the beneficiary of profits, and other information obtained during our anti-money laundering (hereinafter referred to as – “AML”) procedure.

**Information related to transactions:** investment criteria, investments, concluded agreements, payment information, credit card details, bank account.

**Information about your investment experience:** investment objectives, financial situation and a basic understanding of risks associated with investing in the types of investments offered on the Platform.

**Marketing preferences:** the choice to receive marketing communications from us.

**Technical information:** IP address, browser information, language preferences.

**Other information** given by you to us on a voluntary basis, such as our communication.

You must inform us in case of any amendments of personal data provided to us.

#### **2. If you represent a company:**

**Information about the company representative:** Name, surname, date of birth, position.

**Identification information of the representative:** ID card or passport number, validity term, copy of ID card or passport.

**Contact information of the representative:** e-mail address.

**Company information:** information on directors and shareholders.

**AML related information:** information on beneficiaries (name, surname, date of birth, country, ID card or passport number, tax identification number, the status of politically exposed person of beneficiary), the status of politically exposed person of representative, other information obtained during our AML procedure.

**Other information** given by you to us on a voluntary basis, such as our communication.

You must inform us in case of any amendments of personal data provided to us.

## **II. HOW DO WE COLLECT INFORMATION ABOUT YOU?**

**During your Website visits.** When you visit the Website, common non-personal information, such as browser's identifier, the Website's visiting frequency, average time spent on the Website, viewed pages will be recorded automatically. Such information is used with the purpose to provide the Website to you, ensure a better user experience, evaluate our Website and improve its content and functionality.

**During the registration process.** We collect personal data provided in the registration form which potential user of our services fills in and sends to us electronically on the Website. We use this data to perform AML procedures, which are required by the law. If we are clear to act, we use personal data to conclude a contract with you and provide our services to you as a user (hereinafter – “User”).

**During the performance of the appropriateness test.** Investment objectives, financial situation and a basic understanding of risks associated with investing in the types of investments offered on the Platform. Information about your net worth and other information that will help assess your ability to bear potential losses.

**During your Website visits as a User.** When you are a User, we obtain information about your interactions with the Website in order to give you access to our services and information on the transactions so that we can perform our obligations towards you.

If you visit our Website, providing personal data to us is voluntary. If you wish to become a User, providing personal data to us is mandatory, however, certain information might be voluntary.

If you do not provide your personal data, we might be unable to accomplish the purposes stated below.

## **III. FOR WHAT PURPOSES DO WE PROCESS INFORMATION ABOUT YOU?**

**We process information about you in order to fulfil the following purposes:**

- Register you on the Website for our services;
- Communicate with you, for example, send a reminder to finish the application;
- Perform AML procedures and decide whether we can conclude an agreement with you for provision of services (hereinafter – “Agreement”);
- Conclude Agreement with you and execute it;
- Assess your investment experience;
- Comply with statutory requirements in the field of AML, accountancy, tax and others;
- Monitor the operation of our Website and quality of our services;
- Develop new products and services;
- Protect our property and interests;
- Respond to legitimate requests of state authorities;
- Settle disputes and claims;
- With your separate consent – send you commercial communications.

## **IV. WHAT IS THE LEGAL BASIS FOR OUR PROCESSING OF PERSONAL DATA AND FOR HOW LONG ARE THEY STORED?**

**Personal data are processed in accordance with:**

- Article 6(1)(a) of GDPR (your consent);

- Article 6(1)(b) of the GDPR (performance of a contract and taking steps prior to entering into a contract);
- Article 6(1)(c) of the GDPR (compliance with a legal obligation);
- Article 6(1)(f) of the GDPR (our legitimate interests to ensure smooth operation of the Website and quality of services, develop our Website and services, protect our property and interests);
- Article 9(2)(a) of the GDPR (your consent in relation to special categories of personal data, if any);
- Article 9(2)(g) of the GDPR (reasons of substantial public interest on the basis of law);
- Article 13(1) of the S.I. No. 336/2011 - European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 (your consent to receive commercial communication).

Personal data will be stored as long as they are necessary to accomplish purposes for which they were collected unless a longer storage period is stated in the law.

## **V. HOW DO WE DISCLOSE PERSONAL DATA?**

**We may disclose personal data to the following recipient categories:**

**Service providers.** We may disclose personal data to companies rendering services to us, for example, communications service, IT service or verification of sanctions' applicability service providers.

**Other persons related to our services.** In order to execute the Agreement, we need to disclose information about you to third parties related to our services, such as banks.

**Other persons if required by law.** There might be cases where we are obliged to disclose personal data to other persons to comply with statutory obligations or to provide an answer to an inquiry from a governmental or municipal authority.

**Other persons if required for the protection of our rights and legal interests,** for example, police, debt collection agencies or persons whom we transfer claims.

**Other persons, according to your consent.** We may disclose information about you to third parties if you have provided your consent to the disclosure or have requested us to disclose information.

## **VI. JOINT CONTROLLING**

Taking into account that payment processing on our Platform is carried out exclusively by our partner - LEMONWAY, in order to use the Services you are required to open a payment account with LEMONWAY pursuant to LEMONWAY's terms and conditions made available on the Platform. Pursuant to the joint controller agreement, LEMONWAY and MONEDIUS collect and jointly process your personal data for the following purposes:

- Opening and management of your payment account and processing payments in relation to the Services;
- Compliance with the anti-money laundering and terrorist financing requirements. We collect the User's personal data and share it with LEMONWAY, so that LEMONWAY is able to perform the necessary checks according to its internal due diligence procedure and open the payment account.

The requests to access personal data, exercise the right to data portability, limit or object to the processing of the User's data in relation to the mentioned activities will be answered by either LEMONWAY or us. For this purpose, the User may contact LEMONWAY or us by using the following email addresses:

- LEMONWAY – [dpo@lemonway.com](mailto:dpo@lemonway.com);

- MONEDIUS – [dpo@monedius.com](mailto:dpo@monedius.com).

Please note that further information about how LEMONWAY processes your personal data is available in LEMONWAY's terms and conditions made available to you on the Platform and concluded by and between you and LEMONWAY during the registration process with us in compliance with the procedure established on the Platform.

## **VII. HOW DO WE USE COOKIES?**

Cookies are small data files sent by a network server to a web browser, which store information in your computer, phone or other devices as you access the Website. It helps to identify you in different websites, services, devices and browsing sessions.

You can configure your browser in a way that it confirms all cookies, rejects all cookies or notifies you when a cookie is sent. Please be informed that if you choose to reject cookies, it may affect your options to use the Website. Please see further information in our Cookies Policy.

## **VIII. HOW CAN YOU EXERCISE YOUR RIGHTS?**

In cases where we process your personal data on the basis of your consent, you can withdraw your consent at any time. Such withdrawal will not affect the lawfulness of processing of your personal data prior to such withdrawal.

In order to request access, corrections, erasure of personal data, restriction of processing, object to the processing of your personal data or use data portability rights, as well as raise other concerns regarding personal data processing, please send us a request by e-mail to [dpo@monedius.com](mailto:dpo@monedius.com). In case we fail to handle your personal data in accordance with applicable laws, you are also entitled to file a complaint with the data protection supervisory authority (Office for Personal Data Protection of the Republic of Poland: <https://uodo.gov.pl/en>).