

NPL EXCHANGE PLATFORM PRIVACY POLICY

We are glad that you are using our NPL Exchange receivables purchase and sale Platform. We want to make using it convenient and safe for you, which is why we present the Rules for the protection and processing of personal data on the NPL Exchange Platform below

The terms written in capital letters that have not been defined in this Policy have the meaning given to them in the NPL Exchange Platform Regulations available here: <https://nplexchange.com>

1. WHO ARE WE?

1.1. The controller of your personal data is SNV Consult spółka z ograniczoną odpowiedzialnością, ul. Młyńska 16, 8th floor, 61-730 Poznań, entered into the Register of Entrepreneurs of the National Court Register maintained by the District Court of Poznań - Nowe Miasto i Wilda in Poznań, 8th Commercial Division of the National Court Register, under the KRS number: 0001077604, REGON: 389389812, NIP: 7831894392, share capital PLN 5,000. The data controller is hereinafter referred to as **SNVCONSULT** or **we**.

1.2. If you would like to contact us, just write us an e-mail at: info@snvconsult.eu or send a letter to: SNV Consult sp. z o.o., ul. Młyńska 16, floor 8, 61-730 Poznań with the note "Personal data".

2. HOW DO WE COLLECT YOUR PERSONAL DATA?

2.1. We collect your personal data primarily from you. We could also obtain your data from the Participant you work for, who provided it to us in order to create an Account for you on the NPL Exchange Platform. During Registration, in order to create an Account and complete the Participant Verification process, you provide us with your data, which is necessary to use the NPL Exchange Platform. In order for us to provide our services to the Participant, it is necessary for you to provide your personal data. If you do not provide us with your data, unfortunately we will not be able to provide the services, including creating an Account on our NPL Exchange Platform.

2.2. When using the NPL Exchange Platform (including the mobile application version), we also collect information about the device you are using and about you as the Account User and the Transactions conducted on the Account.

2.3. In addition, when you visit our website through which you use our NPL Exchange Platform, we process information using cookies and other similar technologies. These technologies are usually not used to collect information about a specific, identifiable person. In some cases, the information they collect may, however, constitute personal data. If you want to read more about the files we use, you can find this information in the Cookies Policy available here: <https://www.snvconsult.eu/cookiespolicy>.

3. FOR WHAT PURPOSE DO WE PROCESS YOUR PERSONAL DATA?

3.1. **Registration on the NPL Exchange Platform** – In order to use our NPL Exchange Platform, you must Register and create an Account. The data provided during Registration is processed for the purpose of User Verification and then checking the rights to manage the Account and use the full resources and functionalities of the NPL Exchange Platform.

- 3.2. **Using the NPL Exchange Platform** – We ensure that the NPL Exchange Platform functions as intended, so you can sell or buy receivables.
- 3.3. **Answers to inquiries, including via chat** – In order to be able to respond to your questions or reported problems as best as possible, including those regarding the content of the Offer or the terms of the Transaction, we also process information on the content of the exchanged correspondence.
- 3.4. **Using the mobile application** – we process the data provided by you after downloading the mobile application in order to verify the User and then grant permissions to manage the Account and use the full resources and functionalities of the NPL Exchange Platform from the application level. The terms and conditions for using the mobile application are available from the application level.
- 3.5. **Running a fanpage on Facebook** – We process the data you provide on our fanpage for the purpose of conducting information activities regarding our services in social media.

4. TO WHAT EXTENT DO WE PROCESS YOUR PERSONAL DATA?

- 4.1. **Registration on the NPL Exchange Platform** – During Registration it is necessary to provide: the User's name and surname, position, company (Participant) that the User represents, e-mail address and phone number. If we obtained your data from the Participant for whom you work, we received it in the following scope: name, surname, e-mail address, phone number (optional). You must also create an Account Password that will be known only to you.
- 4.2. **Using the NPL Exchange Platform** – in order to enable you to use all the functionalities of the NPL Exchange Platform, we collect information about your device (e.g. IP number, browser, screen resolution or mobile application version). We also have access to information about Transactions made from the Account. In addition, we collect information via cookies and similar technologies under the terms specified in the Cookies Policy available here: <https://www.nplexchange.com/cookiespolicy>.
- 4.3. **Answering your questions, including via chat** – in order to be able to respond to your questions or reported problems in the best possible way, including the content of the Offer or the terms of the Transaction, we also process information on the content of the exchanged correspondence. The scope of data provided in the correspondence depends on you.
- 4.4. **Using the mobile application** - in order to use our NPL Exchange Platform via the mobile application, you must register (authenticate). To do this, you must provide: User's name and surname, e-mail address, User name.
- 4.5. **Running a fanpage on Facebook** – the scope of data you provide to us depends on you, including whether you have a Facebook account registered with your own [including full or abbreviated] data and what information (e.g. in comments) you post on our fanpage or provide us with in private communication (via Facebook chat).

5. ON WHAT LEGAL BASIS DO WE PROCESS YOUR DATA?

- 5.1. Personal data provided for the purposes of Registration on the NPL Exchange Platform and use of the mobile application, as well as processed in connection with the subsequent use and management of the Account, are processed in order to fulfill the agreement regarding the use of the Account, which you conclude on behalf of the Participant (in accordance with the NPL Exchange Platform Regulations).

- 5.2. The legal basis for the processing of your personal data as a representative of the Participant and as a User is Article 6 paragraph 1 letter f of the GDPR, i.e. our legitimate interests, and more specifically:

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- 5.2.1. Proper performance of the agreement for the provision of services by electronic means concluded with the Participant (legal person) that you represent as a representative or employee (in particular consisting in Registration, Participant Verification, Account management, use of the NPL Exchange Platform, including making Transactions and using the mobile application);
 - 5.2.2. Learning your opinion to continually improve our services;
 - 5.2.3. Providing information in response to questions or reported issues, in order to provide Users with the ability to use the NPL Exchange Platform when you contact us;
 - 5.2.4. Conducting information activities regarding our services on social media;
 - 5.2.5. Establishing, pursuing or defending against claims, if any, arising in connection with the use of the NPL Exchange Platform.
- 5.3. Data concerning your use of our NPL Exchange Platform - which we collect via cookies and similar technologies - are processed based on our legitimate interest, which is the proper maintenance of the Portal (Article 6, paragraph 1, letter f of the GDPR) and on the basis of your consent, expressed in accordance with Article 173 of the Telecommunications Law (Article 6, paragraph 1, letter a of the GDPR). You can read about the possibility of withdrawing consent (deleting files or changing browser settings) in our Cookies Policy available here:
<https://www.nplexchange.com/cookiespolicy>.

6. HOW LONG DO WE STORE YOUR PERSONAL DATA?

- 6.1. If you create an Account on our NPL Exchange Platform, your data will be stored until you deactivate your Account on the NPL Exchange Platform (both when you do it yourself and when the Participant you work for does it), and later for the limitation period for claims, but in total no longer than until the end of the year in which 6 years have passed since the claims arose. The storage of your data is for us to be able to respond to your claims in the best possible way or to protect our interests.
- 6.2. If you have asked us a question as a Guest of the Portal and you are not a registered User, we store your data for the time necessary to provide the necessary explanations and answers. By storing your data, we can answer your question in the best possible way.
- 6.3. We process data on how you use our website (obtained via cookies and similar technologies) for the duration of the cookie or until you delete it. Details in this regard are available in the Cookie Policy available here:
<https://www.nplexchange.com/cookiespolicy>.
- 6.4. We process the data you provide via Facebook until you delete this information from the website (e.g. delete a comment), unliking our page or closing your account.

7. WHO IS THE RECIPIENT OF YOUR PERSONAL DATA?

7.1 We disclose your data to other entities only when it is necessary to provide services or when it is necessary for our development and improvement of our offer. These are always entities specializing in a given field, which provide professional services to us. The categories of entities to which your data may be disclosed are:

- Companies providing IT services to us – thanks to this, we can, among other things, maintain the infrastructure and software used to operate and run the NPL Exchange Platform and the mobile application;
- Companies that provide us with accounting and legal services – thanks to this, we can properly implement the services we provide.

7.2 Whenever we disclose your data to other entities, we do so within the framework of applicable regulations. If our service providers process your data on our behalf, they must provide guarantees to implement technical and organizational solutions that will protect your personal data and meet the requirements of the General Data Protection Regulation (GDPR).

8. WHAT RIGHTS DO YOU HAVE IN CONNECTION WITH THE PROCESSING OF YOUR PERSONAL DATA?

8.1 **The personal data protection law gives you a number of rights** that you can exercise at any time. Your rights include:

- the right to access your personal data and the principles of their protection;
- the right to rectify your data;
- the right to delete your data;
- the right to restrict data processing;
- the right to transfer your data to another data controller.

You can exercise the rights referred to above by contacting us at the following e-mail address: info@snvconsult.eu or by writing to SNV Consult sp. z o.o., ul. Młyńska 16, floor 8, 61-730 Poznań, with the note "Personal data".

8.2 The right to withdraw consent

In the scope of some cookies, data processing is based on your consent. Therefore, you have the right to withdraw your consent to data processing at any time. Withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of your consent before its withdrawal. You can read about the possibility of withdrawing consent (deleting files or changing browser settings) in our Cookies Policy available here : <https://www.nplexchange.com/cookiespolicy>.

8.3 Right to object

8.3.1. We would like to inform you separately that you also have the right to object to the processing of your personal data. You can object when, due to your special situation, you do not want us to process your personal data for a specific purpose resulting from our legitimate interests.

8.3.2. If you file an objection, we will no longer process the data for the purpose for which you object. However, please note that in some situations we may have important, legitimate

grounds for processing your data, which will take precedence over your interests, rights and freedoms. In some situations, processing your data may also be necessary to establish, pursue or defend legal claims. In such cases, we will not be able to take your objection into account.

- 8.3.3. You can submit your objection to the following e-mail address: info@snvconsult.eu or by writing to SNV Consult Sp. z o.o., ul. Młyńska 16, floor 8, 61-730 Poznań with the note "Personal data".

8.4 The right to make a complaint

- 8.4.1 If you believe that we have violated the rules for processing your personal data in any way, you have the right to file a complaint directly with the supervisory authority (President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw). In exercising this right, you should provide a full description of the situation and indicate what action you consider to violate your rights or freedoms. The complaint should be filed directly with the supervisory authority at the address indicated above.

9. WILL YOUR DATA BE TRANSFERRED OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)?

In the scope of the NPL Exchange Platform, we use tools provided by external entities that do not transfer data outside the European Economic Area. However, if you have liked our fanpage on Facebook, you must know that placing personal data on Facebook involves transferring this data to countries outside the European Economic Area (EEA) – i.e. countries outside the European Union. The transfer of personal data to third countries takes place on the basis of your consent.

The administrator of data placed on Facebook is Facebook Ireland Ltd.

Contact with the Data Protection Officer of this entity is possible using the form:

<https://www.facebook.com/help/contact/540977946302970>. Detailed information on data processing by Facebook Ireland Ltd. can be found at the following link:

<https://www.facebook.com/privacy/explanation>. The policy contains a declaration of the exercise of data subject rights under the GDPR.

According to the declaration, Facebook Ireland Ltd., as part of a global organization, operates both within and outside the European Economic Area ("EEA") and may transfer and process data in a territory outside the EEA that does not have the same statutory data protection guarantees as in the EEA. Facebook uses standard contractual clauses approved by the European Commission to ensure an equivalent level of protection (more information is available here:

<https://www.facebook.com/help/566994660333381?ref=dp>).

What are the risks involved?

Content posted on a Facebook fanpage is available to any interested person who uses this portal. Therefore, potentially, people from all over the world will be able to see the information you have published on our fanpage. We will make sure that only content that is not contrary to the law, good customs and cultural norms is included there. However, we cannot rule out that a third party will want to use this data for their own purposes. As soon as we learn about such a situation, we will immediately inform the portal and delete the data at the level of the fanpage we run. We would like to emphasize here that it is you who decides what data and information is displayed on our fanpage, therefore

you have control over the information you post there. For our part, we assure you that we will be sensitive to any potential manifestation of hate speech.

Due to the fact that Facebook is headquartered in the USA, we inform you that, in accordance with applicable US law, government agencies have the right to access a wide range of information processed as part of this company's activities - including the personal data of customers and users. We point out that citizens of the European Union do not have the possibility to exercise their rights resulting from the GDPR, including expressing an objection to such data processing by these agencies.

In addition, due to the use of cookies and other technologies on our website by external suppliers, some information obtained by these files may be transferred outside the European Economic Area. More information on this can be found in our Cookies Policy available here: <https://www.nplexchange.comcookiespolicy>.

10. AUTOMATED DECISION-MAKING, INCLUDING PROFILING

Your personal data will not be subject to automated decision-making, including profiling.

11. CHANGES TO THIS DOCUMENT

We may update the Privacy Policy on the NPL Exchange Platform to reflect changes in our information practices relating to how we process personal information. If we make any material changes, we will notify you via email and/or by means of a notice on your Account prior to the change becoming effective. We encourage you to periodically review the NPL Exchange Platform for the latest information on our privacy practices.