

# PRIVACY POLICY

This Privacy Policy sets out the rules for the processing and protection of personal data obtained from Users when using the GOCASH website, available at the Internet address [gocash.global](http://gocash.global), (hereinafter referred to as the "Website"), provided by: a) TRDX Sp. z o. o., ul. Lucyny Krzemienieckiej 9A, 80-448 Gdańsk, NIP: 5842736023, REGON 222100296, KRS 0000512705 b) TotalLead Spoločnosť s ručením obmedzeným based in Bratislava, Slovakia, at the address: Račianska 88 B, 831 02 Bratislava, registered in the Commercial Register under entry no: 183699/B, (hereinafter referred to as the owner or GOCASH or the Administrator).

"User" within the meaning of the Privacy Policy means a natural person using the Website.

Using the Website is tantamount to the User's consent to the terms and conditions described in this Privacy Policy.

## PERSONAL DATA

Pursuant to 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 ("Regulation"), GOCASH informs that it is the administrator of personal data provided by the User in connection with or when using the Website. Personal data are processed in accordance with the Regulation and, in cases required by its content, with the User's consent.

GOCASH only collects data that is necessary to conclude a contract and provide the service selected by the User, answer questions addressed to GOCASH, market its own services and provide information about its offer.

During registration, verification or placing an order for the service, GOCASH collects the data provided by the User in the forms provided. These data include:

1. surname and name,
2. e-mail address,
3. address of residence or registered office,
4. correspondence address,
5. telephone number,
6. payment details (including bank account number),
7. citizenship,
8. scan of the ID card including the following data: name and surname, date of birth, series and number of the identity card.

In cases required by the provisions of the Regulation, the User consents to the processing of his or her personal data in electronic form, by checking the appropriate box during registration or other

procedure aimed at enabling the use of the Website. The user may withdraw consent to the processing of personal data at any time.

Providing data marked as required on the Website is voluntary, but necessary to conclude a contract and provide the service to the User or register the User on the Website. If the User does not provide the required personal data, it will not be possible to register the User on the Website or conclude a contract and provide the service to the User.

The basis for the processing of personal data provided by the User by GOCASH is the need to perform the contract and, at the User's request, to take the necessary actions before its conclusion (Article 6(1)(b) of the Regulation).

In the case of marketing of its own services and GOCASH sending information about its offer to the e-mail address provided by the User, the basis for the processing of the User's personal data is the implementation of the legally justified interest of GOCASH (Article 6(1)(f) of the Regulation).

Data processing to enable GOCASH to provide information about its products and services enables the User to be provided with information about the current offer.

In the case of providing the Newsletter service to the User, the basis for data processing is the User's consent (Article 6(1)(b) of the Regulation), which the User may revoke at any time.

The User's personal data will be stored in a form that allows the User to be identified no longer than is necessary for the purposes for which the personal data are collected and lawfully processed.

Personal data will therefore be stored for the period necessary to perform the contract and provide the service selected by the User.

After this time, the data will be processed for the period necessary to resolve any potential disputes that may arise in connection with the services provided, e.g. related to claims (this period will include the limitation period for claims arising from the contract, in accordance with applicable regulations).

The specificity of the Website means that in most cases the Administrator is obliged by law to process data even when the User no longer uses the Website. This applies primarily to regulations on counteracting money laundering and terrorist financing. Such obligations also come from tax and accounting regulations. To some extent, even if the account on the Website is deleted, the Administrator will process personal data.

## TRANSMISSION OF PERSONAL DATA

The processing of the User's personal data or other data referred to in the Privacy Policy may be entrusted on the basis of a written contract concluded in accordance with the provisions of the Regulation towards entities providing services to GOCASH, e.g. hosting, administration, maintenance and management of the Website.

Subject to the above provisions, the collected personal data will not be disclosed to any other persons or institutions, unless it is required by applicable law or it is necessary to achieve the purpose of personal data processing and an appropriate agreement is concluded to guarantee the protection of the User's rights and privacy.

## USER RIGHTS AND OBLIGATIONS

The User has the right to access the content of personal data and the right to request supplementation, updating, transfer, limitation of processing, rectification of personal data, temporary or permanent suspension of their processing or their deletion if they are incomplete, outdated, untrue or were collected in violation of the law or are no longer necessary to achieve the purpose for which they were collected.

In the case of processing the User's data for the purpose of marketing the service and own products, the User may at any time submit a written and substantiated request to discontinue the processing of his data due to his special situation or object to the processing of his data for this purpose.

GOCASH enables the User to delete his or her personal data from the data set at the User's request or pursuant to the provisions of the Regulation.

GOCASH may refuse to delete personal data if the User has violated the Website regulations or applicable law, and the retention of personal data is necessary to explain the circumstances of the violation and determine the User's liability.

If the User places any personal data of other people on the Website (including their name and surname, address, telephone number or e-mail address), he or she may do so only provided that the provisions of applicable law and the personal rights of these persons are not violated.

## ADDITIONAL INFORMATION ABOUT COOKIES

Cookies are text files that are saved on the disk of the User's end device and are used to recognize the User's device when reconnecting to the website that uses cookies.

Cookies are not used to determine the User's identity, but allow us to more precisely determine the individual needs of the User using a given device and thus offer better services and more tailored to his requirements, as well as facilitate connection with websites of interest to the User.

Cookies are also used by GOCASH for the following purposes:

- statistical - which allows for the creation of statistics on the functioning of websites and User visits for internal purposes and for contractors,
- presentation and personalization of marketing messages displayed on a given end device.

Deleting cookies may result in the loss of the ability to use some functionalities of GOCASH websites.

## OTHER DATA

In some cases, GOCASH collects certain types of information automatically during the User's visit to the Website or via e-mail addresses. Such operational data related to the use of the Website (IP address and port, browser ID, addresses of visited pages) are stored in aggregate and anonymized form and are not made available to third parties. This data is used to better understand and improve the operation, functionality and efficiency of the Website and to generate statistics helpful in administering the Website.

Users' data are also processed by GOCASH for the purpose of automated processing in the form of profiling. Profiling means any form of automated processing of personal data by GOCASH, which involves using Users' personal data to evaluate certain personal factors, in particular to analyze or forecast Users' preferences, reliability, behavior and location. Each User has the right to object to profiling by GOCASH if he or she considers that profiling violates his or her rights and freedoms, unless the data controller demonstrates that its own interests override the rights and freedoms of the person. The Service User may object to profiling free of charge in any form via available communication channels with GOCASH.

## DATA SECURITY

In order to protect the User's personal data against disclosure to unauthorized persons, removal by an unauthorized person, processing in violation of applicable regulations and change, loss, damage or destruction, technical and organizational measures are used to ensure protection of processed personal data appropriate to the threats and categories of protected data.

In particular, the Administrator uses technical measures to prevent data from being obtained or modified by unauthorized persons. The Administrator protects data sets against access by unauthorized entities and provides access to the User's account only after authentication including

providing an individual login and password. Moreover, the data provided by the User when filling out and submitting online forms is encrypted using SSL certificates.

## CONTACT

The Website User may contact GOCASH at any time to obtain information on whether and how GOCASH uses or intends to use his or her personal data, as well as to report any events affecting the security of information and data transmission. For this purpose, the User should use an e-mail address.

## CHANGE OF THE PRIVACY POLICY

GOCASH reserves the right to make changes to the Privacy Policy and at the same time ensures that the User's rights arising from this document will not be limited without his consent. Any changes to the Privacy Policy will be published on the [gocash.global](http://gocash.global) website.

## CONTACT WITH THE SUPERVISORY AUTHORITY

In all matters related to the processing of the User's personal data and the application and implementation of this Privacy Policy, the User has the right to lodge a complaint with the supervisory authority in the field of personal data protection to which the case concerns.