

PRIVACY POLICY

Last update: 04 April 2024

I. INTRODUCTION

Constanta Finance s.r.o. and its group companies and affiliates (hereinafter – “Constanta” or “we”, “us”, “our”, “Company”) collect personal data from our clients and prospective clients necessary to provide our products and services to them and to ensure that we can meet their needs when providing such products and services and the related information. We understand that you are aware of, and care about your personal data protection, and we take privacy seriously.

Constanta is your Data Controller responsible for the collection, use, disclosure, retention and protection of your personal data in accordance with this Privacy Policy, as well as any applicable national laws.

This Privacy Policy describes policies and practices regarding collection, use and processing of your personal data that we receive from you or a third party in connection with our services or during your use of our services and/or our website, as well as sets forth your rights to change the manner of processing and using your personal data. We recognize that personal data protection is an ongoing responsibility, and we may from time to time update this Privacy Policy, as we undertake new personal data processing practices. Any personal data in our possession will be governed by our most recent Privacy Policy. We are fully dedicated to ensuring that our personal data processing practices are in line with the requirements of European Union (EU) Regulation 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.

“**You**” in this Privacy Policy may refer to our clients, our potential clients and website visitors.

Please note that if you are an employee of the Company, a contractor to the Company or a third-party provider, your personal data will be used in connection with your employment contract or your contractual relationship, whichever applies.

II. INFORMATION WE MAY COLLECT AND PROCESS ABOUT YOU

Personal data:

We may collect and process the following personal data about You:

- To open an account with us, you are asked to submit an application for an account and provide complete and accurate personal data listed below and/or otherwise provide information and documents as requested by us so that the Company could consider your application in compliance with applicable laws.

BY CLICKING THE “CREATE ACCOUNT” BUTTON AT THE WEBSITE, YOU GIVE US AUTHORIZATION TO COLLECT AND PROCESS YOUR PERSONAL DATA AND DOCUMENTS IN ACCORDANCE WITH THIS PRIVACY POLICY.

The data that we collect from You are as follows:

- full name and residence address
- contact details (e.g. email address, telephone number);
- date of birth, place of birth, gender, nationality;
- details about your source of funds, assets and liabilities;
- account balances, account activity;
- a liveness check image of you;

- ID information, which includes information necessary to verify your identity such as a passport, driver’s license or Government-issued identity card;
 - information on whether you hold a prominent public function (PEP);
 - other Personal Data or commercial and/or identification information – Whatever information we at our sole discretion deem necessary to ensure compliance with our legal obligations under various anti-money laundering (AML) regulations, such as European Union’s 4th AML Directive.
- Information and documentation that You provide by filling in the Contact Us form available at the “Website”. Such information may include Your name, surname, e-mail address, telephone number and the name of Your company and other information which You provide;
 - A record of correspondence / communication and/or telephone calls in the event You contact us. Such record may include Your name, surname, e-mail address, telephone number, name of Your company and other personal data You may disclose to us during such communication;
 - Where You have been granted access to the Client Interface – details of Your visits, including, but not limited to, location data, weblogs, other communication data and the resources that are accessed by You;
 - Where You use the payment page in connection with our services in order to initiate a transaction and/or a transfer of funds to You – Your personal data, including, but not limited to, name, surname, e-mail address, telephone number, details of Your payment instrument, including, but not limited to, card number, card expiry date, CVC/CVV code, credit/financial institution and/or issuer details and information relating to the purchased products or services, including the location and time of the transaction;
 - Information about You that we receive from other sources, including, but not limited to, our business partners, service providers and subcontractors. Such information may include data provided by banks, payment service providers, credit reference agencies, advertising networks, analytics providers and search information providers, Your business partners, and other third parties, as well as publicly available information.

Other data:

We may also collect non-personal data about You, which does not identify You as a specific individual. Such non-personal data that we may collect includes:

- Browser and device data, for instance, IP address, operating system and browser type. This is statistical data about the Website users’ browsing actions and patterns and does not identify any individual;
- Log information – Information generated during Your use of our services that is automatically collected and stored in our server logs. This may include, but is not limited to, device-specific information, location information, system activity and any internal and external information related to pages that you visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;
- Login, e-mail address, password and location of your device or computer – to provide, troubleshoot, and improve our Services. We use your personal data to ensure functionality, analyze performance, fix errors, and improve the usability and effectiveness of our Services.
- Cookie data, such as time spent on the Website, pages visited, language preferences, and other anonymous traffic data;
- Company data, such as a company’s name, company’s number, company’s address, product and service offerings, jurisdiction.

III. HOW WE USE YOUR PERSONAL DATA AND LEGAL BASIS FOR OUR USE

We will process your personal data on the following bases and for the following purposes:

- We use Your personal data in order to provide our services/products to You, and to respectively conclude contracts and perform our contractual obligations to You. In addition, the processing of personal data takes place to enable the completion of our client on-boarding process.

In view of the above, we must verify Your identity in order to accept you as our client and we will use Your personal data in order to effectively manage your account with us. This may include third parties carrying out credit or identity checks on our behalf. The use of Your personal data is necessary for our

KYC procedure, as we have a legal obligation to comply with “Know Your Customer” and due diligence regulatory obligations under applicable laws and regulations, including Anti-Money Laundering laws and regulations.

- Once You successfully open an account with us, or subscribe for information, we must use Your personal data to perform our services and comply with our obligations to You. We are willing to provide the highest quality products and services in your best interests so we may periodically review Your needs based on our assessment of Your personal data to ensure that You are getting the benefit of the best possible products and services from us.
- We use Your personal data to process your orders, and to communicate with you about orders and services.
- We are also required by law to constantly carry out various activities for the prevention of fraud, money laundering and terrorism financing, as well as for compliance with other legal obligations. There are also various supervisory authorities whose laws and regulations apply to us. Such obligations and requirements impose on us mandatory personal data processing activities for identity verification, payment processing, compliance with court orders, tax laws or other reporting obligations and anti-money laundering controls.
- We use Your personal data to provide functionality, analyze performance, fix errors, and improve the usability and effectiveness of our services.
- We process personal data to prevent and detect fraud and abuse in order to protect the security of our clients, services and other persons. We may also use scoring methods to assess and manage credit risks.
- We process personal data to improve our services and for You to have a better user experience.
- We may need to process Your personal data for internal business and research purposes as well as for record keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with You in relation to the products and services we provide to You and our relationship with You. We will also keep records to ensure that You comply with Your contractual obligations pursuant to the agreement (“Terms of Service”) governing our relationship with You.
- In addition, we process personal data in order to carry out various marketing activities and in this regard, we rely on Your consent as the valid ground for the processing of Your personal data.

Examples of how we may use Your personal data include:

- to provide You with information, products or services requested from us;
- to provide You with information, which we believe may interest You, provided that You have consented to be contacted for such purposes;
- to notify You about changes to our products or services;
- to process transactions/payments;
- to ensure that content from the Website is presented in the most effective manner and to keep our Website safe and secure;
- to allow You to use interactive features of our Website;
- to administer our Website;
- to verify Your identity for legal/regulatory compliance purposes;
- to conduct monitoring against any possible fraud, money laundering, terrorism financing or crime risks;
- to respond to Your inquiries and provide customer support;
- to initiate legal claims and preparing our defense in litigation procedures;
- to ensure the Company’s IT and system security, preventing potential crime, asset security and access controls;
- to manage risks;
- to conduct market research and carry out marketing activities.

IV. YOUR RIGHTS

You have certain rights in respect of the way we treat Your personal data:

- You are entitled to **access** Your personal data and receive information regarding Your personal data that we process. You can do so by either signing in to Your Client Interface account or by contacting us at notifications@constanta.net;
- You are entitled to **rectify** the information we have about You if it is inaccurate. You can do so by either signing in to Your Client Interface account or by contacting us at notifications@constanta.net. To proceed with such requests, in some cases we may need supporting documents from you as proof i.e. personal data that we are required to keep for regulatory or other legal purposes;

- You are entitled to **object** to the processing of Your personal data, except if we can demonstrate compelling legal grounds for the processing;
- You have the right to **revoke Your consent** for processing of Your personal data for the marketing purposes. We will inform You (before collecting Your data) if we intend to use Your data for such purposes or if we intend to disclose Your information to any third party for such purposes;
- You may also request us to **erase** Your personal data or cease the processing of Your personal data. However, please note that this right may be subject to certain exemptions. Namely, in situations where we are under a legal obligation to retain Your personal data, we will not be able to fulfill Your request and, in such event, we will inform You accordingly;
- You may also request us to **provide** Your personal data to You or **transmit** it directly to another controller and we will comply with such request, provided that the personal data processing previously carried out by us was based on Your consent or was necessary for the performance of a contract and where it is technically feasible;
- You have the right to **log a complaint** to the Information Commissioners' Office if You believe that we have not complied with the requirements of the General Data Protection Regulation with regard to Your personal data.

V. HOW LONG WE WILL KEEP YOUR PERSONAL DATA

We will store Your personal data for the period necessary to fulfill the purposes listed above, unless a longer retention period is required or permitted by law. Please be aware that we may be required to retain Your personal data for various legal or regulatory reasons, for example, to ensure that transactions are appropriately processed, settled, refunded or charged-back, as well as to investigate any potential fraud and to comply with anti-money laundering and counter-terrorism financing laws and other legal requirements. This means that in the event where You cease to make use of our services, we will still retain certain personal data in order to carry out our legal obligations.

VI. OUR SERVICES ARE NOT AVAILABLE FOR MINORS

The services/products we provide are not directed to persons under the age of eighteen and we kindly ask such persons not to disclose their personal data to us. If we learn that we have inadvertently gathered personal data from a Minor, we will take legally permissible measures to remove that information from our records.

VII. HOW WE DISCLOSE PERSONAL DATA

We take care to allow Your personal data to be accessed only by those who require access to perform their tasks and duties, and to share only with third parties who have a legitimate purpose for accessing it. We will never sell or rent Your personal data to third parties without Your explicit consent. In certain circumstances we may disclose the personal data we have gathered about You only to the following categories of recipients:

- **Third party identity verification services** in order to prevent fraud. This allows us to confirm Your identity by comparing the information You provide us to public records and other third party databases. These service providers may create derivative data based on Your personal data that can be used in connection with the provision of identity verification and fraud prevention services.
- **Third-party financial institutions.** This may include card organizations, payment systems and credit/financial institutions where You maintain Your payment account or any other type of account to process payments you have authorized.
- **Third-party service providers.** We disclose personal data to service providers only when it is necessary to ensure the provision of our services, including, but not limited to processing of payments/transactions, and to business partners, for business purposes, such as specialist advisors who have been contracted to provide us with administrative, financial, legal, tax, compliance, insurance, IT, debt-recovery, analytics, research or other services.
- **Third-parties in relation to transfer of business.** For instance, if we sell any business or assets or merge with another business entity, it may be necessary to disclose personal data to the prospective business owners or partners.
- **Our group companies.** Which means that any of our affiliates and subsidiaries may receive such information.
- **Third-parties in relation to a legal obligation** or if we are permitted to do so by law. In certain circumstances we may be under an obligation to disclose or share Your personal data with auditors,

regulatory authorities or law enforcement bodies in order to comply with a legal obligation. We may also disclose personal data, if it is permitted by law, in order to enforce or apply the Website Terms of Use or other agreements or to protect our rights, property, customers or others.

We require that service providers and business partners who process personal data to acknowledge the confidentiality of this information, undertake to respect any client's right to privacy and comply with all relevant privacy and data protection laws and this Privacy Policy.

VIII. COOKIES

The Website uses cookies to distinguish You from other Visitors of the Website. This helps to provide You with a good experience while browsing the Website, and also allows us to improve the Website.

IX. SECURITY

Our operations are supported by a network of computers, servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and our third-party service providers and business partners store and process your personal data in the European Union.

All information provided by You to us is stored on secure servers and we use appropriate organisational, technical and administrative measures to protect Your personal data. Once Your information is received, we use strict procedures and security features to prevent any unauthorised access. In accordance with the recommendations of the Payment Card Industry Security Standards Council, Customer card details are protected using Transport Layer encryption — TLS 1.2 and application layer with algorithm AES and key length 256 bit.

However, please note that no transmission of information via the internet is completely secure and no storage system is guaranteed to be entirely secure. If You have any reason to believe that Your interaction with us is no longer secure, please contact us immediately.

The Website may contain links to and from the Websites of Constanta's partner networks/ advertisers/ etc. If the customer follows a link to any of these Websites, Constanta does not accept any responsibility or liability for the privacy policies of these websites.

X. PRIVACY WHEN USING DIGITAL ASSETS AND BLOCKCHAINS

Your funding of bitcoin, XRP, ether, and other Digital Assets, may be recorded on a public blockchain. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other data.

Because blockchains are decentralized or third-party networks which are not controlled or operated by Constanta or its affiliates, we are not able to erase, modify, or alter personal data from such networks.

XI. CHANGES TO THE PRIVACY POLICY

We may change or update this Privacy Policy at any time. Any changes we may make to this Privacy Policy in the future will be posted on the Website and any such changes will be effective starting from the date when we post the revised Privacy Policy.

We give You notifications regarding the changes in the Privacy Policy by posting them on our Website.

XII. DATA PROTECTION OFFICER

We have appointed a data protection officer whom You may contact should You have any questions or concerns regarding our personal data processing practices. Our data protection officer's contact information is as follows: notifications@constanta.net.

XIII. CONTACT

If You wish to contact us regarding this Privacy Policy, please mail us notifications@constanta.net or write us at:

Constanta Finance s.r.o.,
Reg. No 11824395
Bílková 855/19, Staré Město, 110 00 Praha

You also have the right to contact your local Data Protection Authority: the Czech Supervisory Authority - Office for Personal Data Protection / Úřad pro ochranu osobních údajů, address: Pplk. Sochora 27 170 00 Prague 7 , Tel. +420 234 665 111 , Fax +420 234 665 444 , e-mail: posta@uouu.cz , Website: <https://www.uouu.cz/en/>.