

PRIVACY POLICY

Protection of Personal Data and privacy is our priority. This Privacy Policy ("**Privacy Policy**") describes who we are, how we collect, share and use Personal Data and how people whose data we process can exercise their privacy rights.

If you have any questions or doubts regarding our use of your Personal Data, please contact us using the contact details provided in Article 7.

Article 1. Definitions

1. Individual terms used in the Policy bear the meaning assigned to them respectively in Article 2 hereinbelow or in the Regulations of the Autenti platform.
2. The terms used in the Policy mean:
 - a. **Administrator** – Autenti sp. z o.o. with its registered seat in Poznań at ul. Św. Marcin 29/8, 61-806 Poznań, entered into the register of entrepreneurs kept by the District Court for Poznań Nowe Miasto i Wilda in Poznań VIII Commercial Division of the National Court Register under the following number KRS 0000436998, NIP [Tax ID no] 783-169-32-51
 - b. **GDPR** – Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of Personal Data and on the free movement of such data and on repealing the Directive 95/46/EC;
 - c. **Personal Data** – information about a natural person identified or identifiable by one or more specific factors, including, in particular, name, surname, email address, telephone number, device IP number, location data, internet identifier and information collected through cookies and other similar technology;
 - d. **Service Regulations** – separate regulations defining the terms and conditions for the provision Services provided by the Administrator accepted by the Client at the time of placing the order
 - e. **Services** – services provided by the Administrator by electronic means pursuant to applicable Service Regulations.
 - f. **User** – any natural person who uses the Administrator's Services;
 - g. **Client** – a natural person acting on his or her own behalf or on behalf of a legal person or an organizational unit without legal personality who entered into agreements with the Administrator for the provision of Services;

- h. **Account** – a set of data related to a given Client, including information provided by the Client during registration for Services, as well as information on the activity of the Client and Users added to this Account under the Autenti Platform. The Account enables ordering or full use of the services provided under the Autenti Platform, assigned to a given Account.

Article 2. Legal basis and the purpose of Personal Data processing

1. The Administrator processes Personal Data for the purpose of:
 - a. performance of the agreement for the provision of electronic services (pursuant to art. 6 point 1 letter b of the GDPR), and in particular of;
 - i. providing Services of setting up and managing the Accounts, and ensuring their service, document handling and solving technical problems,
 - ii. handling notifications submitted, e.g. via the contact form,
 - iii. directing any communication related to the Services, including marketing of own services referred to in point i. above, including information regarding the Account, new products or functionalities,
 - b. fulfilment of the Administrator's legal obligation (pursuant to Art. 6 point 1 letter c and point 3 of the GDPR), and in particular for the purposes of:
 - i. tax and accounting,
 - ii. considering complaints
 - c. implementation of the legitimate interests of the Administrator (pursuant to Art. 6 point 1 letter f of the GDPR): marketing of own products or services, statistical and analytical purposes,
 - d. pursuing or securing claims or defending against them (pursuant to Art. 6 point 1 letter f of the GDPR).
 - e. marketing activities performed by the Administrator, based on the consent expressed by the User, concerning for e.g.
 - i. the Administrator's provision of the newsletter delivery Service in accordance with the Newsletter Regulations,
 - ii. marketing of own products or Services through the Trusted Partners whom the Administrator cooperates with. Trusted Partners mean entities which Autenti cooperates with in the scope of implementing or providing Services and business partners entered into the List of Trusted Partners which is available under the following [link](#).

2. Detailed information on the processing of Personal Data performed by the Administrator is described in [the Principles of Personal Data processing](#), constituting information clauses pursuant to art. 13 and art. 14 GDPR.
3. In order to use the Services, the User may be required to complete the form available on the Administrator's website, in accordance with the Service Regulations.
4. In the case of registration and logging in to the Account, using the username (login) and password to access other social media services, the data contained in the User profiles of such services, provided in connection with logging into the Account, are treated as the data provided by the User when registering an Account.
5. The Administrator may process third parties Personal Data made available by the Clients or Users for the purposes of communication, recommendation or using the Services, in particular including the conclusion or performance of the agreement concluded through the tools available within the scope of the Services.
6. The Administrator may process Personal Data transferred from external sources, such as public databases, social media platforms, external data providers or Trusted Partners.
7. If the Client or the User submits third party Personal Data to the Administrator for the purposes of communication, recommendation or use of the Services , then – depending on the given situation – the Client provides or entrusts the processing of Personal Data of these third parties to the Administrator. When submitting third party Personal Data, the Client or the User should be entitled to do so, for example, have the appropriate consent of the entity that the Personal Data refer to, as well as fulfil the information obligation towards these entities.
8. If the third party Personal Data are made available to the Administrator, the Administrator becomes the administrator of these Personal Data and, in cases provided for by law, shall fulfil the secondary information obligation towards persons whose Personal Data were obtained in a way other than from the person they concern (in accordance with art. 14 of the GDPR). Complete content of the obligation to provide information.
9. If within the scope of using the Services the User entrusts the processing of Personal Data, the provisions of respective Service Regulations, constituting an agreement for entrusting the processing of Personal Data, will apply.
10. Providing Personal Data is voluntary, however, the consequence of failure to provide personal data may result in the inability to conclude or perform by the Administrator a contract for the provision of specific Services
11. If it is required by the nature of the Service, the Administrator collects the IP addresses during Internet connections and uses them for the purposes of verifying the User's identity or authentication of the provided Service and for technical purposes related to server administration. In addition, IP addresses are

used to collect general, statistical demographic information (e.g. about the region which the connection is made from) and constitute material for statistical analysis and mechanisms for correcting system errors. These data may also be combined with data provided by Users in order to provide Services.

12. Personal Data may be recorded in the system logs. Information collected in the logs is processed in connection with the provision of services. The Administrator also processes the information collected in the logs for technical purposes – in particular, the data may be temporarily stored and processed in order to ensure the security and proper functioning of IT systems, e.g. in connection with creating backups, testing IT systems, detecting inconsistencies or protecting against misuse and attacks.
13. The Administrator uses "cookie" files. The information collected by means of "cookie" files allows to customize the services and the content to the individual needs and preferences of Users and other visitors of the Administrator's website, as well as to develop general statistics regarding their use of the Autenti Platform. Lack of consent to "cookie" files or disabling the option to save "cookies" in the web browser, generally does not prevent the use of the Autenti Platform or the Administrator's website, but may cause some difficulties. Detailed provisions relating to "cookies" are set out in the Cookie Files Policy.

Article 3. The scope and time of Personal Data processing

1. The Administrator processes only the Personal Data provided by the User or collected in connection with the use of the Service.
2. Personal Data processed in order to perform the agreement for the provision of services specified in the relevant Service Regulations will be stored for the duration of the agreement, and after its expiry for the period necessary to:
 - a. provide after-sales client service (e.g. handling complaints);
 - b. secure or pursue claims;
 - c. if necessary – properly provide services in accordance with the Service Regulations, including documenting declarations of will made towards other Users, if any of the other Users still use the Administrator's Services;
 - d. comply with the legal obligations of the Administrator (e.g. arising from tax or accounting regulations).
3. Personal Data processed for the purposes of marketing of products or own services based on a legitimate legal interest, will be processed until the person concerned declares his or her objection.

4. Personal Data processed on the basis of a submitted consent are processed until the consent is withdrawn.
5. After the expiry of the processing period, as long as it is technically possible and if the applicable law does not allow or require further processing of Personal Data, then the Personal Data are irreversibly deleted or anonymised.

Article 4. Sharing Personal Data

1. Personal Data can be made available to entities authorized to receive them, under the relevant legal regulations, including those of competent judicial authorities. Personal Data may also be transferred at the request of the Administrator to entities processing Personal Data indicated by the Administrator, that is service providers providing:
 - a. technical services, inter alia hosting (including data storage in the so-called cloud computing), concerning the development and maintenance of IT systems and websites,
 - b. marketing services,
 - c. debt collection services,
 - d. bookkeeping and accounting services,
 - e. advisory and consulting services,
 - f. trust service or identification service providers
 - g. other entities thanks to which the Administrator provides services by electronic means.
2. Personal data of Users or Clients may be made available to other Users or Clients if it is required for the purposes of communication or using the Administrator's Services.
3. Users' Personal Data may be transferred to third parties – in cases not indicated by the Administrator or by legal regulations – but upon the consent of the User, which may also be expressed through User's appropriate and intentional actions
4. If the User agrees, his or her data can also be made available to other entities for their own purposes, including marketing purposes and sending commercial contents by electronic means.
5. With the exception of Services that are used to identify Users' identities (e.g. Broker ID service), Personal Data may be transferred to a third country or international organization only if that third country, territory or specific sector(s) in that third country or a given international organization where the data are to be transferred ensures an adequate level of protection, pursuant to art. 44–46 GDPR.

6. If the provisions of item 5 above occur to be inapplicable, the Administrator shall apply binding corporate principles, in accordance with art. 47 GDPR or standard contractual clauses in accordance with the Decision of the European Commission of June 15, 2001 on standard contractual clauses for the transfer of personal data to third countries, pursuant to Directive 95/46 / EC. The content of the decision can be found on the website: (<https://eur-lex.europa.eu/legal-content/PL/TXT/PDF/?uri=CELEX:32001D0497&from=en>). In addition, if there is such a need, the Administrator applies additional security measures to ensure an appropriate level of protection.

Article 5. Privacy protection principle

1. The Administrator attaches great importance to the protection of the privacy and confidentiality of Personal Data obtained in connection with the conducted activity, including provided Services.
2. Personal data is processed by the Administrator in accordance with the provisions on the protection of personal data, including in particular the GDPR.
3. The Administrator selects and applies appropriate technical and organizational measures with due diligence to ensure adequate protection of the Personal Data processed. Access to Personal Data is granted only to persons authorized by the Administrator who committed to keep them confidential.
4. The Administrator exclusively uses the services of such subcontractors who guarantee an adequate level of security of Personal Data.
5. Personal Data is protected by the Administrator against their disclosure to unauthorized persons, as well as other cases of their disclosure or loss, and against their destruction or unauthorized modification, through the use of appropriate organizational security, as well as technical and programming security, in particular data encryption systems. Passwords are encrypted in such a way that they cannot be read by the Administrator and persons acting on his behalf.
6. During the provision of the Service, the Administrator exercises due diligence to ensure that the data transmission to and from the Administrator takes place in a safe manner, for example through the use of a secure SSL protocol, while the Administrator is not responsible for that part of data transmission that takes place outside of Administrator of e-mail systems.
7. The Administrator may process personal data in an automated manner, also in the form of profiling, however, the automated processing will not lead to making decisions with legal effects or similarly affect the Users in a significant way. This processing may affect the selection of displayed advertisements or the selection of products or Services offered. The User may receive special offers through personalized online advertising, with the exception of Services which are used to identify the Users' identity (e.g. Broker ID service).

Article 6. Rights and obligations of Users

1. Personal Data Subjects have the right to request access to the content of their Personal Data, request a copy thereof, request their rectification or deletion, request to limit the data processing, request to transfer Personal Data, object to the processing of Personal Data based on the Administrator's legitimate interest or object to their processing for the purpose of direct marketing, withdrawal of consent at any time without affecting the lawfulness of processing (if the processing is based on the consent), which was made on the basis of the consent before its withdrawal.
2. The Client has the right to resign from receiving electronic messages, referred to in art. 2 paragraph 1 letter a, point iii and letter e and demand that the processing of Personal Data be stopped for this purpose. The relevant request should be sent to the following address: iod@autenti.com, at any time. The Client also has the right to resign from the abovementioned Services by clicking the link contained in the e-mails received.
3. The User and the Client are committed to provide the Administrator with complete, current and true Personal Data.
4. Using the rights indicated above in paragraph 1, is feasible by contacting with the Data Protection Officer or the Administrator. The request should indicate the subject of the request, and in particular, what right the User wants to exercise, what type of processing the request concerns and what is the expected way of satisfying his/her request.
5. If the Administrator is unable to determine the content of the request or to identify the applicant based on the submitted request, the Administrator will ask the applicant for additional information.
6. The response to the request will be given within one month of its receipt at the latest. If it occurs necessary to extend the above specified period, the Administrator will inform the applicant about the reasons for such extension.
7. If it turns out that the processing of Personal Data violates the provisions of the GDPR or other provisions on the protection of Personal Data, the data subject may submit a complaint to the President of the Personal Data Protection Office

Article 7. Administrator's contact details

Contact with the Administrator or the Personal Data Protection Inspector appointed by the Administrator is possible through:

- a. electronic form available on the website: <https://autenti.com/kontakt/>; or

- b. at the email address: iod@autenti.com; or
- c. at the traditional mail address: Autenti sp. z o.o, ul. Św. Marcin 29/8, 61-806 Poznań