

FinoTech Limited Privacy Protection Policy

The FinoTech Limited Protection Policy (hereinafter referred to as: “the Policy”) is applicable since 24th May 2018. Subject to provisions applicable only to the Users (individuals and legal entities) who are in European Union (hereinafter referred to the: ‘EU’), the Policy is applicable also to Users from non-EU countries, and regardless of User’s place of residency/ registered offices in relation to legal entities, and provides the same appropriate technical and same organisational measures to ensure a level of security appropriate to the risk at the same level like those applicable to Users from EU countries.

FinoTech is owner of website called: <https://finotech.com/> as well its inherent IT infrastructure and makes any effort to protect the privacy of people using its website.

In order to implement the principle of lawful, reliable and transparent processing of your personal data while using Our Website and Our services, we accept a document called Privacy Policy.

Privacy Policy determines how we look after your personal data and your rights.

The Policy shall enter into force on 24th May 2018.

1. WHICH DEFINITIONS WE USE IN THE PRIVACY POLICY?

FinoTech, We, Our, Us – FinoTech Limited 5 The Mall street London W5 2PJ.

GDPR – 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 and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

Website/Service – website (<https://finotech.com/>) belonging to FinoTech, within which provides some functionalities.

User – an adult natural person or legal entity who visits the Website.

You, Yours – User.

2. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA AND HOW YOU CAN CONTACT WITH US?

FinoTech is the Controller of your personal data in connection with the use of the Website.

If you have any questions regarding the processing of your personal data and your rights, please contact Us: by e-mail to the following address: dataproteccion@finotech.com

3. WHAT PERSONAL DATA WE PROCESS, IN WHICH PURPOSES AND ON WHAT LEGAL BASIS?

Due to the fact that We provide basic Website, which does not provide any comprehensive functionalities for its Users, We do not process extensive type of Your personal data. In order to provide You with the most transparent information, We have grouped this information referring to the purpose of processing Your personal data.

Contacting with Us and examination of Users' complaints and applications

The scope of data. For this purpose, we process personal data provided by You during visitation Our Website, i.e. regarding: Your localization, Your IP. If you register for the Services via an external authentication service (e.g. Facebook Connect, Google +), we also collect Your name and surname; session data, Your device and operating system, browser, location and unique ID; Your IP, your telephone number and the data providing by You during the phone call (especially Your name and surname, data regarding to Your location as well the country in which You resides); Your email via an external authentication service (e.g. Your email account provider).

Balance of interests. After assessment Our interests and Your interests, rights and freedoms, We believe that data provided by You during contact with Us will not interfere excessively with Your privacy or will not constitute an excessive burdensomeness for You. In

the course of evaluating Your interests, rights and freedoms We have taken into account the following circumstances: logging in via email, facebook or Google + is strictly connected with disclosure of personal data, that you are voluntarily sharing in Internet; We do not process the personal data, based on which You could be exclusively identified; upgrading the standards of services provided by Us, resulting in the securing of Users' personal data as well devices, which are being used during contact with Us; avoiding the risk of suspension of the Website due to the illegal activities of dishonest Website Users.

Legal basis: Our legitimate interest [Article 6 (1f) of the GDPR], consisting in improving the functionality of Our Services.

Maintenance of IT infrastructure of affiliate panel called 'unilink' for Our Customers.

With respect to IT tools designed by Us for Our clients to manage the affiliate panel called 'unilink', which is fully anonymized for the users of the panel, We are able to see only username, users' device and operating system, users' browser, users' location and their unique ID; user-generated content, posts and other content submitted by users to Our clients' websites; user's IP; user-generated content.

Legal basis: Processing is necessary for the performance of a contract for the provision of IT services to Our clients [Article 6 (1b) GDPR].

Enclosing of a job application if the recruitment process is carried out

The scope of data: To this end, We process personal data about Your activity on the Services, that is: session data, Your device and operating system, browser, location and unique ID; Your localisation, Your IP, Your email as well all data provided in Your CV and Your application letter, including employment and career history, information which relates to Your the education and any professional training, via an external authentication service (e.g. Your email account provider).

Legal basis: the User's consent to the processing of his or her personal data for the purpose of recruitment process [Article 6 (1a) GDPR] .

Statistics on the use of particular Website functionalities and facilitating the use of the Website as well as ensuring the IT security of the Website.

The scope of data: For these purposes, we process personal data regarding Your activity on the Website, such as: Your localisation, Your IP, visited websites and subpages of the Sites and the amount of time spent on each of them, as well as data about Your search history, Your IP address, location, device ID and browser data, and operating system.

Balance of interests. After assessment Our interests and Your interests, rights and freedoms, We believe that statistics on the use of particular Website functionalities and facilitating the use of the Website as well as ensuring the IT security of the services will not interfere excessively with Your privacy or will not constitute an excessive burdensomeness for You. In the course of evaluating Your interests, rights and freedoms We have taken into account the following circumstances: We do not process the personal data, based on which You could be exclusively identified; upgrading the standards of services provided by Us, resulting in the securing of Users' personal data as well devices, which are being used during contact with Us; avoiding the risk of suspension of the Website due to the illegal activities of dishonest Website Users; preventing FinoTech from malicious actors.

Legal basis: Our legitimate interest [Article 6 (1f) of the GDPR], consisting in improving the functionality of Our Services.

Determination, prosecution of claims and enforcement of claims.

The scope of data: For this purpose, We may process certain personal data provided by You during communication with Us, such as: name, surname, date of birth, Your ID, Your place of residence, data on the use of Our services, if the claims result from the manner in which You use Our services, other data necessary to prove the existence of claims, including the extent of the damage suffered.

Balance of interests. After assessment Our interests and Your interests, rights and freedoms, We believe that the collection the data, specified above will not interfere excessively with Your privacy or will not constitute an excessive burdensomeness for You. In the course of evaluating Your interests, rights and freedoms, We have taken into account the following circumstances: upgrading the standards of Website provided by Us, resulting in the better quality of Our Website; avoiding the risk of suspension of the Website due to the illegal activities of dishonest Website Users; preventing FinoTech from negative legal consequences, influencing on ability of upgrading the standards of using the Website.

Legal basis: Our legitimate interest (Article 6 (1f) of the GDPR), consisting in determining, prosecution of claims and enforcing claims and defending against claims in proceedings before courts and other state authorities.

4. DO WE MATCH THE WEBSITE WITH TO YOUR INTEREST AND PREFERENCES?

FinoTech does not use profiling to test your preferences. However, due to the use of this type of tools for marketing purposes by, among others, suppliers of Your internet browser, websites such as Google + and Facebook, in order to provide You with the most transparent information below, we describe what profiling is about.

The scope of data: To this end, internet service providers (different than FinoTech) may use Your personal data provided by You during contact with Us, as well as data about Your activity on the Website, recorded and stored via cookie files and page views that have not been completed by sending a message, the hyperlinks You have clicked, networks and any other information You choose to share when using you on third party websites, platforms and applications (hereinafter referred to as: 'Third Party Sites') (such as when you use the "Like" functionality on Facebook or the +1 functionality on Google+), the websites You visited before arriving at FinoTech Website, information about the type of browser You use, details of the web pages You have viewed, Your IP address (collectively defined as: 'Site Usage Information').

Profiling: Marketing companies (different than Geek Soft) use the above data to create Your profile as a potential recipient of marketing services, corresponding to Your interests and

preferences. Then, based on Your profile created in this way, they choose and present to You the best matching ads and messages.

Marketing of Our products and services.

The Policy applies to personal information collected by the FinoTech in connection with the services We provide. This includes also information collected offline through the direct marketing campaigns, sweepstakes and competitions, and online through Our services, applications and branded pages on third party platforms and applications accessed or used through such websites or third party platforms.

The Policy also applies to targeted FinoTech content, including offers and advertisements for FinoTech products and services, which We (or a service provider acting on our behalf) may send to You on Third Party Sites based on your Site Usage Information. These Third Party Sites may have their own privacy policies and terms and conditions. We encourage You to read them before using those Third Party Sites.

The scope of data: For this purpose, We process personal data provided by You during Your activity on the Website, recorded and stored via cookies. Activity data relate in particular to such data as: search history, clicks on the Website, visits to the main pages of the Sites and their subpages, login and registration dates, data on the use of certain functionalities on the Website, history and Your activity related to Our e-mail communication with you; We also receive information which marketing campaign (e.g. Google AdWords) has influenced Your interest in the Website.

Profiling: Marketing companies (different than FinoTech) use the above data to create Your profile as a potential recipient of marketing services, corresponding to Your interests and preferences. Then, based on Your profile created in this way, they choose and present to You the best matching ads and messages.

Remarketing: In order to reach You with our marketing messages outside of the Website, We use the services of external suppliers. These services consist in displaying our marketing messages on websites other than the Our Website. For this purpose, external providers install, for example, the appropriate code or pixel to download information about Your activity

on the Website. Details can be found in the Cookies Policy, laid down in point 10 of this document.

Balance of interests: After assessment Our interest and Your interests, rights and freedoms, We believe that marketing will not interfere excessively with Your privacy and will not be an excessive burdensomeness for You. In the course of assessment interests, rights and freedoms, We have taken into account the following circumstances:

a) as part of the marketing of our clients' products and services, We do not provide Your personal data; in this way We limit the circle of people having access to Your personal data;

b) We ensure that We have implemented appropriate guarantees to protect Your privacy, namely:

i. We only use data about the professional sphere of Your life. We are only interested in what pertains to using Our Website, not Your private life;

ii. We only use data about Your activity on the Website, not what You do on other websites.

Depending on Your location, there may be solutions to help You control Your online behavioural advertising preferences (such as whether certain third parties may collect and use your Site Usage Information for targeted advertising purposes). For example, in Europe the website www.youronlinechoices.com allows You to choose which companies can deliver customized ads while in the US You may use the Network Advertising Initiative's Opt-Out Tool and the Digital Advertising Alliance's Opt-Out Tool.

Legal basis: Our legitimate interest [Article 6 (1f) of the GDPR], consisting in the marketing of our products and services dedicated.

5. TO WHOM DO WE TRANSMIT TO YOUR PERSONAL DATA?

We transmit Your personal data to the following categories of recipients:

Service providers: We may process Your personal data to service providers that We use to run the Services. Service providers to whom we transmit Your personal data, depending on contractual arrangements and circumstances, or are subject to Our documented instructions as to the purposes and methods of processing these data (processors) or independently determine the purposes and ways of processing them (controllers).

Processing entities: We use other suppliers who process your personal data based on Our documented instructions. They provide us with a cloud computing service, provide us with online marketing systems, display web push notifications, send e-mail messages, analyze traffic in the Services, analyze the effectiveness of marketing campaigns, and maintain the IT infrastructure of Website and its functionalities.

Controllers: We use suppliers who do not act solely on our documented instructions and will set goals and methods of using your personal data. They provide Us with services of marketing, remarketing campaigns and provide a license for some IT solutions.

Location: Most of Our suppliers are based mainly in the countries of the European Economic Area (hereinafter referred to as: 'EEA'), e.g. in UK. Some of Our service providers may be based outside the EEA. In case of the transfer of Your data outside the EEA, We will make sure that Our suppliers guarantee a high level of protection of personal data. These guarantees result in particular from the obligation to use standard contractual clauses adopted by the Commission (EU) or participation in the Privacy Shield program enacted by Commission Implementing Decision (EU) 2016/1250 of 12th July 2016 on the adequacy of protection provided by by the EU-US Privacy Shield.

You have the right to request us to provide copies of standard contractual clauses by addressing the request in the manner indicated in point 2 of this Policy.

Public Authorities: We provide your personal data if we are required by authorized state authorities, in particular organizational units of the prosecutor's office, the Police , Information Commissioner's Office and other entitled authorities of UK.

7. HOW LONG DO WE STORING YOUR PERSONAL DATA?

We will store this data for a period of 3 years from the receipt form You for the purpose consideration of complaints and claims related to the use of Our Website.

We store other personal data of Users for a period of time corresponding to the life cycle of cookies stored on their devices. Details on how We use cookies can be found in the Cookies Policy, laid down in point 10 of this document.

8. WHAT ARE YOUR RIGHTS IN RELATION TO PROCESSING YOUR PERSONAL DATA?

We ensure the implementation of Your rights listed below. You can exercise Your rights by submitting a request via email.

The right to withdraw consent.

You have the right to withdraw any consent, if the processing of your personal data on the Website is based on Your consent and you provided it at the time of registration to the Website, as well during using individual functionalities offered on the Website - only in event of the Website as well individual services and functionalities offered on the Website providing data processing based on your consent. Withdrawal of consent has effect since the moment of its withdrawal. The withdrawal of consent shall not affect the lawfulness of processing, performed by Us based on Your consent before its withdrawal.

Withdrawal of consent does not entail any negative consequences for You. However, it may prevent You from continuing to use the Services or functionality that We can lawfully provide only based on Your consent. Except to job application, when the recruitment is carried out, the Website does not process personal data based on Your consent. You will be informed during the collection of personal data in the event of the introduction of our new services involving the personal data processing based on Your consent.

Legal basis: Article 7(3) of the GDPR.

The right to object to the data being used

You have the right to object at any time to the use of your personal data, if We process Your data based on our legitimate interest, e.g. in relation to the marketing of Our products and services.

If Your objection turns out to be legitimate and we have no other legal basis to process Your personal data, We will delete Your data which is subject of the objection raised by You.

Legal basis: Article 21 of the GDPR.

Right to erasure ('right to be forgotten')

You have the right to request the erasure of all or some of Your personal data.

You have the right to request erasure of personal data if:

- a) you withdrew Your specific consent to the extent to which Your personal data were processed based on Your consent;
- b) Your personal data have ceased to be necessary for the purposes for which they were collected or processed;
- c) You raised an objection to the use of Your data for marketing purposes;
- d) You raised an objection to the use of Your data in order to conduct statistics on the use of the Website, and the opposition was considered justified;
- e) Your personal data is processed unlawfully.

Despite the request to erase personal data, in connection with opposition or withdrawal of consent, We may retain certain personal data in the field of asserting or defending claims. This applies in particular to personal data including: name, surname, email address, documents provided by You during the email communication with Us, which We retain for purposes of handling complaints and claims related to the use of Our Website.

Legal basis: Article 17 of the GDPR.

Right to restriction of processing

You have the right to request a restriction on the processing of Your personal data. If you submit such a request, it will prevent You from using certain functionalities or services, involving the the personal data processing covered by the request. You will also not receive any messages, including marketing messages.

You have the right to request restrictions on the use of Your personal data in the following cases:

a) when You contest the accuracy of Your personal data - then We will restrict their use for the time needed to verify the accuracy of Your data, but no longer than for 7 days since the receipt of Your request;

b) if the processing of Your data is unlawfully, and instead of erasure Your personal data, You will demand restriction of their use;

c) where Your personal information has ceased to be necessary for the purposes for which We have collected or used it, but it is necessary for You to determine, assert or defend claims;

d) if You object to the use of Your data - then the restriction occurs for the time needed to consider whether, due to Your special situation, protection of Your interests, rights and freedoms override the interests based on which We process when We process Your personal data.

Legal basis: Article 18 of the GDPR.

Right of access to the data.

You have the right to obtain confirmation from Us whether We process your personal data, and if this is the case, You have the right to:

a) get access to Your personal data;

b) obtain information about the purposes of processing, categories of personal data being processed, the recipients or categories of recipients of this data, the planned period of storage of Your data or criteria for determining this period, information concerning your rights under the GDPR and the right to file a complaint to the supervisory authority, the source of these data, on automated decision-making, including profiling and safeguards applied in connection with the transfer of these data outside the European Union;

c) obtain a copy of Your personal data.

Legal basis: Article 15 of the GDPR.

The right to rectify Your personal data

You have the right to rectify and supplement Your personal data. You have the right to request us to correct this data (if it is incorrect) and to supplement it (if it is incomplete).

Legal basis: Article 16 of the GDPR.

The right to data portability.

You have the right to receive Your personal information that You provided to Us and then send it to another personal data controller chosen by You, e.g. to another controller of similar services. You also have the right to request that personal data be sent by Us directly to such other controller, if it is technically possible.

We will send your personal data in the form of a csv file. The csv format is a commonly used, machine-readable format that allows you to send the received data to another controller of personal data.

Legal basis: Article 20 of the GDPR.

When do we meet your request?

While - by exercising the aforementioned rights - You request Us, We comply with this request or refuse to comply with it without delay, but no later than one month after receipt. However, if - due to the complexity of the request or the number of requests - we will not be able to meet your request within a month, we will meet them within the next two months, informing you in advance about the intended extension.

For technical reasons, we always need 72 hours to update the settings you have selected in our systems. Therefore, it may happen that you will receive an email from us during the system update, from which you have given up.

Filing complaints, inquiries and applications

You can make complaints, requests and applications to Us regarding the processing of Your personal data and the exercise of Your rights.

If you believe that Your right to the protection of personal data or other rights granted to you by virtue of the GDPR have been violated, you have the right to fill a complaint against Us to the Information Commissioner's Office .

9. HOW DO WE LOOK AFTER THE SAFETY OF YOUR PERSONAL DATA?

We strive to ensure the security of Your personal data. The Services use encrypted data transmission (SSL) during registration and logging in, which protects the data identifying You and significantly hinders the interception of access to Your account by unauthorized systems or persons

10. HOW DO WE USE COOKIES?

A. WHAT ARE COOKIES?

Cookies are text files saved by a web browser on the disc of your computer or other device, in order to store information used for your identification or memoization the history of activities undertaken by you in the Website.

In addition to cookies, we also use other similar technologies such as:

Fingerprinting is a technology that gathers and analyzes information about your device (information about the browser, operating system, installed plug-ins, time zone, screen size, system fonts and other configurations) through which you use the Website. This information is used to identify you and ensure the security of the Website.

Device recognition involves the use of collected data for analysis of Your device (information about the browser, operating system, installed plugins, timezone, screen size, system fonts and other configurations) operations based on statistics and probability and assigning a common identifier to data resulting from device use. The purpose of this action is to try to recognize You (e.g. recognize that You are the same user that uses multiple devices). This information is used to identify You.

Mobile In-App Tracking is a lot of technologies that provide information activity analysis in a mobile application. These technologies are not based on cookies installed via browsers and can not be controlled using browser settings. These technologies can use the device ID or other identifiers, such as "Ads ID" to link Your app activity to a specific application and analyze Your activity in the app or devices.

In order to ensure the transparency of the information contained in the Cookies Policy, all the technologies indicated above will be referred to as cookies.

B. WHICH TYPES OF COOKIES USE?

We use cookies that differ from each other in the life cycle as well as the internet domain from which they originate.

Due to the life cycle, we divide cookies into:

session - deleted simultaneously with closing the web browser,

permanent - deleted at the end of a predetermined time, regardless of the closure of the web browser.

Due to the internet domain from which they originate, we divide cookies into:

own - set by the web servers of our Websites,

third parties - set by web servers of websites other than Our Websites.

C. WHAT PURPOSES ARE USED FOR COOKIES?

Optimizing the use of the Website (necessary and analytical cookies)

We use our own cookies to provide you with the convenience of using the Website, including to limit the number of appearing notifications. We use cookies also to check the security of the information system and to remember your preferences.

Website and Website page view statistics (analytical cookies)

We use third-party cookies (e.g. Google Analytics, Google Analytics 360) to count visits to the Website, their length and to determine which functionalities of the Website or its parts were most frequently used or visited. The information collected in this way allows us to analyze the Website's performance and determine the directions of development of new functionalities.

Tracking activity on the Website (analytic cookies)

We use Our own cookies in order to identify You for the purpose of analyzing Your activity on the Website, determining what activities You undertake on the Website.

Displaying ads tailored to Your preferences (advertising cookies)

Our cookies and external suppliers' cookies (e.g. Google Adwords) are used to run marketing campaigns and remarketing campaigns that reach Ours with Our marketing messages if you have previously visited our Website. These cookies remember that You have visited Our Website and what activities You have done in Our Website. Information collected in this way is transferred to external suppliers.

D. HOW TO MANAGE COOKIES?

You can specify the conditions for storing or accessing cookies using web browser settings or service configuration. In the menu bar of the web browser in the "Help" section You can find information on how to reject saving new cookies, how to delete previously stored cookies, how to request notifications about saving a new cookie file and how to block the operation of cookies.

By taking the utmost care in providing the highest possible quality of Website, We inform you that changes to cookie settings, by refusing to save cookies may cause difficulties and may even prevent You from using certain functionalities.

11. AMENDMENTS IN THE PRIVACY POLICY

Depending on Our needs, We may change and supplement the Privacy Policy. We will inform You about any changes or additions by posting relevant information on the main pages of the Services, and in case of significant changes, We can also send You separate notifications to the email address provided by You.