



Protecting the privacy of Verestro customers is very important to us. Below we publish an explanation of what data we collect and what rules for their processing we use. We limit the use and collection of information about users to the minimum necessary to provide services at the highest level.

This document contains information on: the Administrator of personal data, rights, cookies in the browser,

We reserve the right to make changes to this Notice. Changes may be due to legislation and/or reflect changes in Verestro's processing of personal data. This version was created on 20/01/2025.

For the sake of clarity, the following phrases have been used in this document:

We, - Verestro SA with its registered office in Warsaw, ul. Promienna 10, 03-672 Warszawa, KRS number 0000387683, with NIP 525-250-78-99 and REGON 142961695 with the share capital of PLN 128.878,30,

You - person who entrusts his personal data for processing due to at least one purpose indicated in this information. In order to increase the clarity of the text, we allowed ourselves to contact directly.

1. Privacy Statement Information

In this Privacy Statement, we explain – in an accessible and transparent manner – what personal data we collect about you and how we process it. The statement refers to:

- all our past, present and potential customers. We are required by law to retain personal information about you, including for a specified period of time after our relationship has ended,
- any person involved in any transaction through the Verestro services.

Personal data refers to all information that can tell us something about you or that we can associate with you. This includes your name, address, date of birth, payment card details, home address, IP address or payment information you make with us. We understand processing as everything we can do with such data, e.g. collecting, recording, storing, changing, organizing, using, disclosing, transferring or deleting it.

You provide us with your personal information when you become our customer, register for our online services, complete an online form, use our products and services, or contact us through one of our communication channels. In addition, we obtain data from legal entities or other entities that you represent or that have designated you as a contact person.

2. Types of data we collect about you

The personal information we collect includes:

- Identification data, such as name, date and place of birth, PESEL number, email address, phone number, title, nationality, tax identification number, residence/correspondence address, parents' names, mother's family name, identity document numbers and series. The data may also include biometric data. We verify that the data matches the data you provide or receive from relevant documents, records or lists, as well as device identification data (e.g., phone number, IP, email, mobile device numbers) that you use. Transaction data, such as your payment card number, amounts and places where the transaction is carried out,
- behavior and preferences data , such as IP address,
- Data about your mobile device or computer, including browser data and its language.
- We process identification data to check identity and verify it. We process biometric data when the prerequisite provided by law is met, e.g. the express consent of the person.
- We also process business, professional or social activity data. This is data or information about your business needed in connection with a service or product offered by or through Us.

Sensitive data

We do not record sensitive data that relates to your health, ethnicity, political convictions or religious beliefs.

Children Data

We do not collect data on children.

3. What do we do with your personal data?

We only use your personal information for legitimate business reasons. This applies to the following circumstances:

- Administration: after creating an account, we are legally obliged to collect personal data that allows you to verify your identity (e.g. number, telephone number, e-mail address) and to be able to contact you,
- Delivery of products and services: we use information about you to carry out operations requested by you,
- Marketing: we may send you e-mails or text messages with offers of products or services when you give appropriate consent, e.g. when logging in to our website or in our mobile applications. You can withdraw such consent at any time,
- Fraud prevention and detection and data security: it is our responsibility to protect your personal data, prevent, detect and contain data breaches. This includes information we are required to collect about you, e.g. to comply with - anti-money laundering, anti-terrorist financing and tax fraud laws,
- We may process your personal information to protect you from fraudulent activities, such as if you fall victim to identity theft, your personal information has been compromised or your device is hacked,
- If necessary, your data may be used in the course of an audit or investigation, and to develop and improve our products, e.g. by obtaining your opinion on our products and services; to the extent that your consent is not required under applicable law.

4. Who do we share your data with and why?

State authorities

To comply with our regulatory obligations, we may disclose data to relevant authorities, e.g. for anti-terrorism and anti-money laundering purposes. In some cases, we are obliged - in accordance with the law - to share your data with third parties, judicial/law enforcement authorities, such as the police, prosecutor's office, courts and arbitration/mediation bodies at their express and lawful request.

Financial institutions

When you pay with a payment card, we need to share information about you with a financial institution such as Mastercard, e.g. your name and phone number. payment card, shipping address.



Service providers

When we use the services of other service providers, we only share personal data that is required for a given assignment. Service providers support us in activities such as:

- provision of specific services and performance of specific operations,
- designing and maintaining web tools and applications,
- marketing activities or events and managing customer communications,
- preparing reports and statistics, printing materials and designing products.

In all such cases, we ensure that third parties only have access to the personal data that is necessary to perform specific tasks.

Whenever we share your personal information internally or with third parties in other countries, we put in place the necessary safeguards to protect it. We may transfer data outside the European Economic Area (EEA) to countries for which the European Commission has found an adequate level of protection. In addition, when data is transferred outside the European Economic Area (EEA) to countries for which there is no European Commission decision declaring an adequate level of protection we apply appropriate safeguards in the form of:

- standard contractual clauses adopted within the European Union,

(they concern the transfer of data by an entity within the EU outside the European Economic Area in order to ensure compliance with EU data protection regulations),

5. Your rights and how we respect them

We respect your rights as a customer to determine how your personal information is used. These rights include:

Right of Access to Information

You have the right to contact us to receive a summary of the personal data we process.

Right to rectification

If your personal data is incorrect, you have the right to ask us to rectify it. If we share information about you with a third party and that information is later rectified, we will also notify that third party.

Right to object to processing

You can **object** to us using your personal data due to legitimate interests. You can do it via the Internet by sending an e-mail or to the address of our office. We will review your objection and whether the processing of your information has any adverse effect on you that requires us to stop such processing.

We will not be able to recognize your objection to the processing of personal data in the following situations:

- if we are legally required to do so,
- if it is necessary for the performance of a contract with you.

Right to restriction of processing

You have the right to ask us to restrict the use of your personal data if:

- you think the information is incorrect,
- we process unlawful data,
- we no longer need such data, but you want us to keep it in case of claims,
- you object to our processing of your data due to legitimate interests and this objection has been recognized by us.

Right to data portability

You have the right to ask us to transfer your personal data directly to you or to another organisation. This applies to personal data that we process in an automated manner and with your consent or on the basis of a contract concluded between us. If it is technically possible, we will transfer your personal data.

Right to delete

You can ask us to delete your personal data if:

- we no longer need them for the purposes for which the data was collected,
- you withdraw your consent to their processing and we have no other basis for processing,
- you object to our processing of your data for our legitimate interests, and there are no overriding legitimate interests of data processing and this objection has been recognized, or for the purpose of sending commercial messages,
- we process your personal data unlawfully or the provisions of the European Union or a European Union Member State require us to delete your personal data.

Right to complain

If you are not satisfied with the way we have addressed your concerns, you have the right to file a complaint with Verestro. If you are still not satisfied with our response to such a complaint, you may submit it to the Verestro Data Protection Officer at the address provided in section 10 of this statement.

6. How we protect your personal data

We have internal policies and standards throughout our organization to protect your data. We update these policies and standards periodically to keep them in line with regulatory and market changes at all times. In particular, and in accordance with the law, we use appropriate technical and organizational measures (policies and procedures, IT security measures, etc.) to guarantee the confidentiality and integrity of your personal data, as well as the way it is processed.

In addition, our employees are subject to confidentiality obligations and may not unlawfully or unnecessarily disclose your personal information and how it is protected.

7. What can you do to help us protect your data?

Protecting your data is our priority. We try our best, but there are some actions you can take yourself:

- install and update anti-virus, anti-spyware and firewall software,
- do not leave devices, payment cards unattended,
- immediately report a lost card to the relevant services and block it immediately,
- always log out of portals if you no longer use them,
- keep passwords strictly confidential and use the so-called strong passwords, i.e. avoiding obvious combinations of letters and numbers,
- be vigilant online and learn how to spot unusual activity, such as a new website address or phishing messages.

8. How long do we store your personal data?

The period of processing of your data depends on the purpose for which they were collected and are processed, or on the provisions of law or your consents and other representations. The principle period of data processing - for the time necessary for the performance of the contract/application, preparation for the performance of the activity in question does not exceed the archiving period of documentation, which is 6 (six) years, except that this period ends on the last day of the calendar year, unless the law provides for a different period. We may keep your personal data only for as long as necessary for the purposes for which we originally needed them. After that time, we use available solutions, such as archiving.

The mentioned periods do not add up. Data may be processed separately according to individual purposes and legal basis, e.g. you can revoke a specific consent for processing data for marketing purposes, but this does not deprive the Bank of its right to process data for another purpose or on another legal basis.

9. Contact with Verestro

If you want to know more about our data policies, as well as how we use your personal data, you can contact us: by e-mail. At the end of this document, you will find contact information with details of data protection authorities.

10. Scope of the Privacy Statement

This document is the Verestro SA Privacy Statement. We may change the Privacy Statement to comply with any changes in the law or to reflect how we process personal data within our organization. The latest version of the document is available at <https://verestro.com>

Data protection officer contact information	Data protection authority
iod@verestro.com dpo@verestro.com st. Promienna 10, 03-672 Warsaw with the note DPO	Personal Data Protection Office https://uodo.gov.pl/