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1. Definition of the terms used in the Privacy Policy

- 1.1. User – an individual, a legal entity or an organizational unit with no legal entity using the services provided electronically through the websites specified in clause 2, as defined in Article 4(1) of the General Data Protection Regulation (GDPR).
- 1.2. Personal data – all information about the identification of an individual or information that can be identified, as defined in Article 4(1) of the GDPR.
- 1.3. Operator, Administrator of personal data – LLC "NEO BANKERS", a company registered and operating in accordance with the legislation of Poland, KRS (National Court Register) code 0000981293, registered at the address: Żłota 61/101, 00-819 Warsaw, Poland. The Operator acts as a data controller as defined in Article 4(7) of the GDPR.
- 1.4. Service – Internet services hosted on such Internet domains: – <https://neobankers.io> each of which is individually defined as a "Service".

2. General information

- 2.1. The Service Operator is LLC "NEO BANKERS", as specified in clause 1.3.
- 2.2. The Operator can obtain information about the Users and their behavior as follows:
 - 2.2.1. Through the information and data voluntarily entered into the forms of the website, in accordance with Article 6(1)(a) of the GDPR;
 - 2.2.2. By storing cookies in terminal devices (the so-called "cookies"), in compliance with Article 5(3) of the ePrivacy Directive 2002/58/EC and the Polish Act of 16 July 2004 Telecommunications Law;
 - 2.2.3. By collecting web server logs, as permitted under Article 6(1)(f) of the GDPR for the legitimate interests of the Operator.
- 2.3. The Operator makes every effort to grant protection of privacy to the Users of the Service and applies a policy of minimizing actions that lead to the provision of data about the Users or transfer of such data to third parties for processing. The Operator has implemented and applied the rules and procedures for the protection of personal user data required by the GDPR and the Polish Act of 10 May 2018 on the Protection of Personal Data.
- 2.4. In the event third parties are involved to verify and identify the Users and store electronic copies of documents provided by the Users, such third parties must comply with the rules and procedures for the protection of personal user data, as required by the GDPR and the Polish Act on the Protection of Personal Data. This cooperation is governed by Article 28 of the GDPR regarding data processors.

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3. Web Forms

- 3.1. By using the forms the Operator collects and processes only information and personal data the User provides voluntarily, in accordance with Article 6(1)(a) of the GDPR.
- 3.2. The website can also store information about connection settings (timestamp, IP address), as permitted under Article 6(1)(f) of the GDPR for the legitimate interests of the Operator.
- 3.3. The data stored in the form are protected by the Operator in accordance with the principles set out in this Privacy Policy and Article 32 of the GDPR.
- 3.4. The data provided in the form are processed for the purpose arising from the functions of the particular form, in compliance with Article 5(1)(b) of the GDPR.
 - 3.4.1. User data (including personal data) provided in the registration form and account activation form at <https://neobankers.io> are processed by the Operator as the Administrator of personal data for such purposes:
 - 3.4.1.1. Verification and identification of the Users in order to prevent fraud and other illegal activities, as per Article 6(1)(f) of the GDPR;
 - 3.4.1.2. Compliance with the requirements of the legislation regarding the legalization (laundering) of proceeds from crime, financing of terrorism and proliferation of weapons of mass destruction, in accordance with the Polish Act of 1 March 2018 on Counteracting Money Laundering and Terrorist Financing;
 - 3.4.1.3. Concluding an agreement with the User and acting in accordance with the rules of this Website, as per Article 6(1)(b) of the GDPR.
 - 3.4.2. User data (including personal data) provided in the registration form and account activation form at <https://neobankers.io/> may also be processed for marketing purposes (including direct) of the Operator's services subject to prior, direct and voluntary consent, in compliance with Article 6(1)(a) of the GDPR and Article 172 of the Polish Telecommunications Law.
 - 3.4.3. User data (including personal data) provided in the contact form at <https://neobankers.io> are processed by the Operator as the Administrator of personal data in order to respond to inquiries and maintain correspondence, as per Article 6(1)(b) of the GDPR.
- 3.5. The data obtained from the forms can be provided to entities that technically perform certain services, in particular, this concerns the provision of information to Electronic Payment Systems or other organizations with which the Service Operator cooperates in this regard. Such data sharing is conducted in compliance with Article 28 of the GDPR regarding data processors.
- 3.6. When filling out the forms on the Website, all user data (especially the data used when logging in and initiating a transfer) is protected from theft or interception by encryption using an SSL certificate. The entire process from logging into an account to logging out is encrypted ("end to end" data protection), in accordance with Article 32 of the GDPR.

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4. Server Logs

- 4.1. Some information on user behavior is recorded at the server level. These data are used to administer the service and ensure the most efficient service provision, as permitted under Article 6(1)(f) of the GDPR for the legitimate interests of the Operator.
- 4.2. The resources visited are identified by their URLs. In addition, the following information may be recorded:
 - 4.2.1. Time of request receipt
 - 4.2.2. Response time
 - 4.2.3. The name of the client station in case of identification by the HTTP protocol
 - 4.2.4. Information on errors occurred when performing transactions with Electronic Units when using the HTTP protocol
 - 4.2.5. URL of the webpage the User previously visited (referrer link) if the webpage was accessed through a link
 - 4.2.6. The User's browser
- 4.3. The data specified in clause 4.2 may be associated with specific Users of the Service, in compliance with Article 6(1)(f) of the GDPR.

5. Newsletter and email contact with the Users including direct marketing of the Operator

- 5.1. Ordering electronic and free messages with marketing content (including a newsletter) from the Operator does not require filling in a separate form. For the purpose of sending newsletters and other forms of electronic marketing, the Operator processes such personal data as name and surname, and e-mail address. The e-mail address is required to convey the text to the reader. The first and last name allows addressing the User in a personalized way. This processing is based on Article 6(1)(a) of the GDPR [1] and Article 10 of the Polish Act on Providing Services by Electronic Means.
- 5.2. Newsletters contain information about the Service and other services of the Operator (for example, promotional offers, new offers, partner promotional offers, prize draws and user contests), non-commercial lists (for example, greetings, personal comments, etc.) and other marketing information about the services rendered by the Service.
- 5.3. Consent to email marketing is always voluntary. The Operator never makes any registration of a User or any account activation in the Service dependent on the consent to carry out direct marketing to the email address provided by the User, in accordance with Article 7(4) of the GDPR.

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- 5.4. Giving consent to receive newsletters is equivalent to giving consent to such content:
 - 5.4.1. Acting as a consumer of telecommunication services within the meaning of Article 2 of the Telecommunications Act as of 16 July 2004 (the current version is available at https://www.uke.gov.pl/gfx/uke/userfiles/m-pietrzykowski/telecommunications_act_en.pdf), I hereby agree to the Operator's (LLC "NEO BANKERS", a company registered and operating in accordance with the legislation of Poland, KRS (National Court Register) code 0000981293, registered at the address: Żłota 61/101, 00-819 Warsaw, Poland) direct marketing provided using telecommunication devices by way of sending marketing and commercial information to my e-mail address.
- 5.5. The User may at any time withdraw their consent to email marketing to the specified e-mail address, thus refusing the Operator's processing of their personal data for marketing purposes. Withdrawal of consent to receive messages that contain email marketing (objection to the processing of data for direct marketing purposes) does not limit or exclude other services of the Operator. This right is in accordance with Article 21 of the GDPR.
- 5.6. Withdrawal of consent to receive electronic marketing messages by e-mail is carried out by selecting the appropriate box in the content of each such message. Regardless of the method specified in the previous sentence, the User may at any time submit an application to the Operator and withdraw their consent to the processing of their personal data for direct marketing purposes, thus refusing the Operator's processing of their personal data for marketing purposes. Such application may be submitted in any form; however, the Operator recommends sending it by e-mail to the e-mail address of the support service directly on the Website. This process is in compliance with Article 7(3) of the GDPR.
- 5.7. Regardless of the newsletter or other marketing e-mails, the Operator reserves the right to send messages without informing the Users whose contact details it has received at <https://neobankers.io> and who have accepted the Privacy Policy. Such messages are not newsletters directly related to the services of the Operator and its activity, and contain technical information (including interruptions and changes in the services, new functions), as well as legal and organizational information (including information about changes in the regulations or organizational changes of the Operator). This is based on the legitimate interest of the Operator as per Article 6(1)(f) of the GDPR.

6. User phone number and phone marketing at the specified phone number

- 6.1. Phone numbers provided by the Users are used to render the ordered services, in particular, to check and confirm orders and provide the User with information about the execution of their order. In this case, the Operator makes both voice calls and sends SMS/MMS messages. This processing is based on Article 6(1)(b) of the GDPR for the performance of a contract.

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- 6.2. The User can allow the Operator to inform them about new services, offers, advertising campaigns, as well as to initiate phone calls or send SMS/MMS messages to the specified phone number. The Operator reserves the right to use such information for the direct marketing of goods and services. This is subject to the User's consent in accordance with Article 6(1)(a) of the GDPR and Article 172 of the Polish Telecommunications Law.
- 6.3. Giving consent to receive information and offers on the specified phone number is equivalent to giving consent to the following text: Acting as a consumer of telecommunication services within the meaning of Article 2 of the Telecommunications Act as of 16 July 2004 (the current version is available at https://www.uke.gov.pl/gfx/uke/userfiles/mpietrzykowski/telecommunications_act_en.pdf), I hereby agree to the Operator's (LLC "NEO BANKERS", a company registered and operating in accordance with the legislation of Poland, KRS (National Court Register) code 0000981293, registered at the address: Żłota 61/101, 00-819 Warsaw, Poland) direct marketing provided using telecommunication devices by way of sending marketing and commercial information to my phone number (by voice calls and SMS/MMS messages).
- 6.4. The User can withdraw their consent to use their phone number provided to the Operator for direct marketing free of charge and at any time, in accordance with Article 7(3) of the GDPR.

7. Final provisions

- 7.1. The Privacy Policy (Confidentiality) together with the Cookies Policy is valid from August 12, 2022. The Operator reserves the right to change the Privacy Policy and the Cookies Policy at any time. The unified text of the Privacy Policy and the Cookies Policy if amended will be available on the main webpage of the Service in the "Privacy Policy" tab. The Operator informs the Users a week prior to the planned changes indicating the scope of changes and their actual time. If the User fails to accept the changes, the agreement for the provision of electronic services will be terminated at the end of the period specified in the message. Any change to the Privacy Policy and the Cookies Policy will be reflected in the "Privacy Policy" tab on the main webpage of the Service. This process is in compliance with Article 13 of the GDPR regarding the provision of information to data subjects.

Revision date: August 12th, 2024.

We appreciate your time.
Respectfully, sincerely yours,

The NeoBankers team