

Investment Port sp. z o. o.

Privacy Policy of Binderless System

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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, hereinafter: **RODO**), we have included below information regarding the principles of processing and protection of your personal data: (a) in connection with the provision of services by us: (i) directly to you if you are a sole proprietor or (ii) to an entity that you represent, on behalf of which you act or by which you have been authorized to contact us in connection with the business relationship between us, (b) or in connection with your visit to and use of our website or applications available at www.binderless.com (hereinafter: **System**). Please read this Privacy Policy (hereinafter: **Privacy Policy**) carefully before using our services.

1. Who is the controller of your personal data?

The administrator of your personal data processed in connection with the provision of services through the System is Investment Port sp. z o. o., based in Lublin at ul. Gospodarcza 26, 20-213 Lublin, Poland, KRS: 0000909665 (hereinafter: **Administrator**).

You can contact us by writing to: support@binderless.com or by mail to: Investment Port Sp. z o.o., Gospodarcza 26, 20-213 Lublin, Poland.

2. How do we collect your personal information?

We collect your personal data when you use the System, contact us via the contact form at www.binderless.com, by phone or email to learn about our offer, or use our services. We may also obtain data concerning the business activity conducted by you or the entity you represent from public registers such as the polish CEiDG or KRG

3. Which of your personal data do we process?

3.1. Data that you provide to us directly:

Business process	Scope of information collected	Is it necessary to provide this data?
Creating an account in the System	Email, first name, last name.	Providing data is necessary to use the services offered in the System.
Entering into a service agreement	1. In the case of individual entrepreneurs: first and last name, name of business conducted, business address, TIN or other number identifying the enterprise. 2. For persons representing companies: name, position, name of the represented entity.	Providing the above data is necessary to use the services offered in the System.

Telephone communication and correspondence	<p>Name, business or employment address, employer's name, contact telephone number, business email address.</p> <p>We also collect all the information you choose to give us during a conversation or in correspondence with our employees or representatives.</p>	Providing data is necessary to use the services offered in the System.
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3.2. Data obtained from third parties or public records:

Business process	Scope of information collected	
Entering into a service agreement	<ol style="list-style-type: none"> 1. In the case of individual entrepreneurs: address and contact data related to the business obtained from information providers (e.g., business intelligence agencies) and publicly available registers (e.g., CEIDG). 2. In the case of persons representing companies: name, surname, position, name of the represented entity, which can be provided to us by the company's board of directors or the person entering into the agreement on behalf of the company, indicating you as the authorized contact person in connection with the execution of the agreement. 	
Execution of the agreement	Personal data (bank account number, payment card number) obtained from payment and service providers when you use credit or payment cards or carry out transactions through the electronic banking system; data obtained from our business partners if we have your consent or if permitted by law.	
Telephone communication and correspondence	In the case of persons representing companies: name, position, name of the entity represented, business telephone number, business email address, which may be provided to us by the company's board of directors or the person entering into the agreement on behalf of the company, indicating you as the authorized contact person in connection with the execution of the agreement.	

3.3. Automatically acquired data:

Business process	Scope of information collected	
Use of the Service	<p>Device data - information about the device through which you use the Service (such as desktop computer, cell phone, tablet), such as operating system version and unique identifiers. Information related to your device is linked by us to the user account you log into.</p>	
	<p>Login data - technical information such as the IP address of the device through which you log in to your account in the System, time zone and operating system information, login information (date of registration, date of last password change, date of last successful login) and type and type of Internet browser.</p>	

	Data about activity in the System - the date of each visit, the duration of the visit, as well as the order in which different sections of our System were visited.
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4. What is the purpose, legal basis and retention period of your personal data?

Purpose of processing	Legal basis	Data retention period
Using your account in the System	<ul style="list-style-type: none"> Article 6(1)(b) of the RODO - the necessity of the processing for the conclusion and performance of a agreement to which the person is a party in connection with the Administrator's provision of services related to the maintenance and operation of the account - with respect to persons conducting business activities; Article 6(1)(f) of the RODO - the Administrator's legitimate interest in ensuring the proper performance of the agreement - with respect to persons representing the entity party to the agreement and persons appointed to perform the agreement. 	Data will be processed for the duration of the agreement.
Use of the System	<ul style="list-style-type: none"> Article 6(1)(b) of the RODO - the necessity of processing to conclude and perform a agreement to which the person is a party in connection with the Administrator's provision of electronic services in terms of providing content and functionality in the System Article 6(1)(f) of the RODO - the Administrator's legitimate interest in protecting its own rights and business interests - in ensuring the security of the System, including fraud prevention - and, to the extent that the activities carried out are required by law, also Article 6(1)(c) of the RODO, i.e. the necessity of the processing for the performance of the Administrator's legal obligations. 	Data will be processed for the duration of the use of the System.
Conclusion and execution of a agreement for the provision of other services	<ul style="list-style-type: none"> Article 6(1)(b) of the RODO - the necessity of processing for the conclusion and performance of a agreement to which the person is a party - with respect to persons conducting business activities Article 6(1)(f) of the RODO - the Administrator's legitimate interest in ensuring the proper performance of the agreement - with respect to persons representing the entity party to the agreement and persons appointed to perform the agreement; Article 6(1)(c) of the DPA - the necessity of the processing to comply with the Administrator's legal obligations (e.g. tax obligations) 	The data will be processed for the duration of the agreement and the period under the relevant laws, including tax and accounting regulations, and anti-money laundering.

Telephone communication and correspondence related to the agreement	<ul style="list-style-type: none"> • Article 6(1)(b) of the RODO - the necessity of the processing for the performance of a agreement to which the person is a party - with respect to self-employed persons; • Article 6(1)(f) of the RODO - the Administrator's legitimate interest in ensuring proper performance of the agreement - with respect to persons representing the entity that is party to the agreement and persons appointed to perform the agreement 	The data will be processed for the duration of the agreement, and after its termination, cancellation or expiration for the time specified in the statute of limitations or necessary for the assertion of claims until the legal conclusion of the case.
Client relationship management and marketing activities	<ul style="list-style-type: none"> • Article 6(1)(f) RODO - the Administrator's legitimate interest in ensuring the quality of services provided or in promoting products and services offered by the Administrator 	Until you object to the processing of your personal data for marketing purposes
Analytics and statistics	Art. 6(1)(f) RODO - the Administrator's legitimate interest in analyzing the activity and preferences of users in order to improve the functionality of the System and the services provided	Data will be processed for the duration of the use of the System or for the duration of the agreement.
Determining, pursuing or defending against claims	Art. 6(1)(f) RODO - the Administrator's legitimate legal interest in protecting its own rights and business interests	The data storage period may be extended each time if the processing is necessary to establish, assert or defend against claims - the data will be stored for the time specified in the statute of limitations or necessary to assert claims until the case is finally settled.

Where we refer to legitimate interest as the legal basis for processing your personal data, it is the existence of a business rationale such as, the need to prevent abuse and harm, to facilitate the use of services and improve their functionality, to build positive relationships with System Users, to survey satisfaction with our services or to use personal data for marketing purposes. We will process your data for purposes related to the fulfillment of our legitimate interests only if our interests are clearly overridden by your interests, in accordance with Article 6(1)(f) of the RODO.

We do not process your personal data for the purpose of automated decision-making, including profiling.

5. Who can we share your data with?

We may share some of your personal data with the following categories of recipients:

- 5.1. to service providers we use to operate the System, in particular IT and hosting service providers, including cloud computing, marketing and analytics service providers, postal and courier service providers, our legal advisors and tax advisors, and auditors. System providers to whom we transfer your personal data, depending on contractual arrangements and circumstances, act as:
 - 5.1.1. an entity that processes your data on our behalf and solely on our instructions, whereby the sharing of your personal data with these entities is always carried out on the basis of an entrustment agreement for the processing of personal data that meets the requirements set forth in Article 28 of the RODO;

- 5.1.2. an independent data controller, independently determining the purposes and uses of your personal data.
- 5.2. authorized state authorities, in particular, organizational units of the prosecutor's office, the Police, the President of the Office for Personal Data Protection or the President of the Office of Electronic Communications.

6. Transfer of data outside the European Economic Area

The level of protection of personal data outside the European Economic Area ("EEA") differs from that provided by European law. The Administrator transfers personal data outside the EEA only when necessary and with an adequate level of protection, primarily by:

- 1) Cooperation with processors of personal data in countries for which a decision has been issued by the European Commission on the determination of ensuring an adequate level of personal data protection;
- 2) Use of standard contractual clauses issued by the European Commission;
- 3) application of binding corporate rules approved by the relevant supervisory authority.

7. Your rights in relation to our processing of your personal data

You are entitled to:

- 7.1. Pursuant to Article 15 of the RODO - to access your personal data that we process (i.e. you can find out whether we process your personal data, and if so, request information on what kind of data it is, for what purposes and how we process it);
- 7.2. Pursuant to Article 16 of RODO - to request the rectification of your personal data that is incorrect or the completion of incomplete personal data;
- 7.3. Pursuant to Article 22 of the DPA - not to be subject to decisions based solely on automated processing, including profiling, which produce legal effects on you or similarly significantly affect you. You have the right to obtain human intervention from the Company, to express your position, and to challenge this decision. The Company does not use automated decision-making, including profiling, which could have such effects, unless you expressly consent to it, or if the processing is necessary for the conclusion or performance of a agreement between you and the Company, or is permitted by law;
- 7.4. Based on Article 17 of the RODO - to request erasure of your personal data, in certain cases, e.g. data are no longer necessary for the purposes for which they were processed, consent to the processing of personal data has been withdrawn, unless the Administrator has other legal grounds for processing, data processing was unlawful;
- 7.5. Pursuant to Article 18 RODO - to request the restriction of the processing of your personal data, in certain cases, i.e. (a) when you question the correctness of the processed data (for a period of time allowing us to check its correctness), (b) when the processing is unlawful and at the same time you object to its erasure, (c) when the data are no longer necessary to us for the purposes for which we processed them, while they are necessary for you to establish, assert or defend your claims, (d) when you have objected to the processing of your data for the purposes of our legitimate interests due to your particular situation - until we determine whether these interests are superior to your rights and freedoms (pursuant to Art. 21(1) RODO);
- 7.6. Based on Article 20 of the RODO - the right to portability of personal data, i.e. the right to receive personal data in a structured machine-readable format and request that it be sent to another controller;

- 7.7. Pursuant to Article 21(1) of the RODO - to object to the processing of your personal data based on the legitimate interest of the Administrator (i.e., pursuant to Article 6(1)(f) of the RODO) for reasons related to your particular situation; In some cases, we can demonstrate that we have legitimate grounds for processing your data that override your rights and freedoms (e.g., the need to ensure the security of the System and prevent fraud);
- 7.8. Pursuant to Article 21 (2) of the RODO - to object to the processing of your personal data for the purposes of direct marketing of our products and services;
- 7.9. To withdraw at any time your consent to the processing of personal data, if we process such data based on consent. At the same time, we inform you that your withdrawal of such consent shall not affect the lawfulness of the processing of your data on the basis of such consent before its withdrawal;
- 7.10. To lodge a complaint with a supervisory authority if you consider that the processing of your personal data in the aforementioned scope violates the provisions of the RODO or national legislation. The competent authority for personal data protection in Poland is the President of the Office for Personal Data Protection, address: Stawki 2, 00-193 Warsaw, Poland.

You can exercise all the rights indicated above by contacting us by writing to: support@binderless.com or by mail to: Investment Port Sp. z o.o., 26 Gospodarcza Street, 20-213 Lublin, Poland.

We will make every effort to respond to all legally legitimate requests within one month of receipt. It may happen that in case of particularly complicated requests or submission of several requests at the same time, it may take us longer than a month to process them. If this is the case, we will inform you of the extension of the deadline and provide you with up-to-date information on the implementation of your request.

8. Information about so-called cookies

8.1. What are cookies?

We use "cookies" on the System. Cookies (so-called "cookies") are computer data, especially in the form of small text files, which are stored on the users' terminal devices and are intended for the use of websites. When a user returns to a website, these files allow the website to recognize the device and adjust the displayed content accordingly. Through these files, data transmitted to the server by web browsers or devices of people using the website, such as, for example, IP address, software and hardware parameters, pages viewed, mobile device identification number, information on the use of applications and other data on devices and use of systems, are automatically obtained and recorded.

8.2. For what purpose do we use cookies?

8.2.1. We use cookies on the System for the following purposes:

- 8.2.1.1. Maintain the continuity of your session after logging in to the System; this way, within one session, you do not have to re-enter your login information on each sub-page of the System;
- 8.2.1.2. Use the "Remember Me" option, which provides you with access to your account on the System without having to log into the System each time. This access is provided if you connect to the System from the terminal device you were using

when you selected this option and placed the cookie. Please note that if you select the "Remember me" option, any person who uses your terminal device can access your account on the System, including data pertaining to your agreement for the provision of services by the Administrator;

8.2.1.3. Customizing the System to your needs and remembering your settings on the System; As part of these activities, we may collect information about when and for how long you visit our System, information about your browser history and language preferences;

8.2.1.4. To create statistics on the viewing of the subpages of the System, to analyze the accessibility of our System, the ways it is used and its performance. We use this information to maintain, operate and continuously improve the services we provide;

8.2.1.5. To ensure the security of the System, login sessions and detect illegal activities.

8.3. Types of cookies used on the System

8.3.1. Within the System, two types of cookies are used - "session" and "permanent". Session cookies are temporary files that remain on the user's terminal equipment until the user logs out, leaves the website or shuts down the software (web browser). Permanent cookies, on the other hand, remain on the user's end device for the time specified in the parameters of the cookies or until they are deleted by the user.

8.3.2. Due to the purpose of use, the System uses the following types of cookies:

- a) indispensable - necessary to ensure that you can properly use the functionalities provided by the System; they enable the operation of basic functions, such as security, identity verification and network management; they cannot be disabled;
- b) marketing - used to track the effectiveness of advertisements in order to provide more tailored services and display advertisements that better match your interests; functional - to enrich the functionality of the System; without them, the System will work properly, but will not be tailored to your preferences; they collect data in order to remember your individual choices and provide you with a better and more personalized experience;
- c) analytics - helps us understand how users interact with our site, also helps us detect errors and provides better overall statistics.

8.3.3. Our System may contain links to other websites, including websites or applications of our business partners. Please note that third-party websites may also use cookies. We have no control over third-party websites and are not responsible for the cookies they collect or access. When clicking on a link to another site, please note that each site has its own cookie policy. We encourage you to familiarize yourself with them before using other websites by reading their cookie policies.

8.4. Information security

The data that is collected using cookies is collected only in connection with the performance of certain functions in relation to the user. The collected data is encrypted in a way that prevents unauthorized access.

8.5. System analytics

- 8.5.1. External cookies may also be placed by entities providing analytical services to us, such as Google Inc. in order to collect information about the use of the System for statistical purposes and to improve the performance of the System, including, for example, counting visits to the System, their length, and determining which functionalities of the System or its parts were used or visited most often and how they were used by individual users. The information we collect in this way allows us to analyze the performance of the System and determine directions for the development of new functionalities and services.
- 8.5.2. In the case of Google Analytics, information on how Google uses data from sites and applications that use their services is available at <https://www.google.com/policies/privacy/partners/>.
- 8.5.3. In addition, we would like to inform you that you can download a browser add-on that limits the scope of information used by Google Analytics on <https://tools.google.com/dlpage/gaoptout?hl=pl>.

8.6. Changing browser settings

- 8.6.1. Web browsing software (web browser, (e.g. Safari, Firefox, Internet Explorer, Chrome, Opera) usually allows cookies to be placed on the user's terminal device by default. Users can make changes to these settings in such a way as to block the automatic handling of cookies, or to notify them each time they are sent to the user's device. In addition, the web browser also allows users to delete cookies. Detailed information on the possibility and methods of handling cookies by a specific web browser is usually available in the "Help" section of the web browser's menu or on sites such as www.allaboutcookies.org, www.wszystkooociasteczkach.pl.
- 8.6.2. At the same time, we would like to inform you that restricting the use of cookies may affect some of the functions provided on the System.

9. Technical and organizational measures and processing security

We store all the information we process, including your personal data, on properly secured servers. We have also implemented appropriate and necessary technical and organizational measures to protect your data. We constantly monitor the degree of information security within our IT network, as we update internal regulations and procedures to protect your data from accidental or unlawful loss, access or disclosure, identify foreseeable risks to the security of our IT network and minimize risks arising from security threats. We assess the risks of network security breaches on an ongoing basis and conduct regular tests in this regard.

10. Change in Privacy Policy

The Administrator reserves the right to change the Privacy Policy. The current text of the Privacy Policy will always be available in the System.

The current version of the Privacy Policy is effective as of 17 September 2024.