

PRIVACY POLICY

(1) PERSONAL DATA ADMINISTRATOR (FLEXIDEA Polska sp. z o.o.)

The administrator of your personal data is: FLEXIDEA Polska sp. z o.o. (ul. Ogrodowa 58, 00-876 Warsaw) (KRS 0000970340; NIP: 5273000970); Tel: +48 22 221 01 20; Email: rodo@flexidea.eu (hereinafter also referred to as "Administrator" / "Company" / "FLEXIDEA").

(2) INTRODUCTION

The Privacy Policy (hereinafter also: "Privacy Policy" / "Policy") provides an overview of how your personal data are collected and processed for the website with the main address www.flexonline.pl and its subpages (hereinafter also: "Portal" / "Service" / "Site" / "Website").

Within the Privacy Policy, information is available on how we process your personal data in connection with your use of the Website, as well as your rights under the Data Protection Act of 10 May 2018 (hereinafter also referred to as the "Act") and the 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 (hereinafter also referred to as the "RODO"). What specific data is processed in detail and how it will be used depends on the services we provide to you.

This Privacy Policy is of a general nature and contains information about the processing of personal data for the purposes of running the Portal, it is also intended to inform you about how your personal data is collected, used and disclosed.

(3) THE SCOPE OF THE DATA PROCESSED DEPENDS ON YOUR CONTRACT/SERVICE

The full data processing rules are already linked to a specific product/service (e.g., invoice financing). In order to have the fullest understanding of the processing rules of your personal data, you should read the dedicated personal data processing information provided to you with the conclusion of the contract with FLEXIDEA.

And so in the case of:

1. Customer (customer's representative) - we provide this information when concluding the contract as an appendix to the Terms and Conditions;
2. Consignee (debtor of the financed invoices) - we provide this information each time together with the notice of assignment.

FLEXIDEA also provides other information about the processing of personal data within the framework of its own legal relationships, in cooperation with job applicants, employees, contractors, collaborators, intermediaries, etc. - each time complying with the obligations under Articles 13-14 of the RODO in a manner appropriate to the relationship/contract in question.

In the following section of the Policy, we present information dedicated to the user of the Website, regardless of which features of the Website you choose to use.

(4) USE OF THE PORTAL



By using the Portal, you consent to our collection and use of your personal information as described in this Policy. If we change the Policy, FLEXIDEA will inform you on the Portal by making the revised version of the Policy available to you. However, we will not follow or chase you to give you this information :). Remember that you can always go to the Portal and find the current content of the Policy.

(5) PURPOSE OF THE PORTAL

Please remember that the Portal is intended exclusively for entrepreneurs as defined by Polish law. FLEXIDEA enters into contracts exclusively with entrepreneurs - natural persons running one-man businesses, partners in civil partnerships as well as commercial law companies and other entities that are entrepreneurs.

(6) WHAT PERSONAL INFORMATION DOES FLEXIDEA COLLECT?

When you visit and use the Portal or use our services, you may provide us or we may collect personal information about you, such as your name, email address, phone number, personal identifier, job title and other personal information.

You may choose not to provide us with certain information, but this may prevent you from accessing the service or limit the features available on the Portal.

We disclose a full list of the categories of personal data collected in the personal data processing information provided with the Terms and Conditions upon entering into the Agreement.

(7) DATA COLLECTED BY THE PORTAL

When you use the Portal, we may also passively collect data through cookies, pixels, web beacons, log files and other technologies. This information allows us to provide more helpful information, services and tools dedicated to you.

(8) HOW FLEXIDEA USES YOUR PERSONAL DATA

FLEXIDEA uses personal data to provide services to the User, including:

- register the User and provide him/her with access to the Portal and/or to the services requested by the User;
- check that you meet the requirements set out for the client in the terms and conditions;
- check and assess your creditworthiness;
- the identification, prevention and detection of fraud or other crime;
- respond to your enquiries or requests, including complaints and claims relating to the quality of the service provided;
- send you news and e-mails regarding the Portal or our services;
- analyse, compare and research data on users and their interaction with the Portal.

(9) DATA RECEIVED BY FLEXIDEA FROM THIRD PARTIES

We may also verify online and/or offline information received from third parties (including credit reference agencies) against the information you provide.

Information from third parties is used in a general way:

- in order to verify the data provided by the user and/or to assess creditworthiness;
- to verify other information about you;
- in order to improve the content and services we offer to users.

(10) SECURITY OF PERSONAL DATA

We follow appropriate security procedures when storing and disclosing your personal information to prevent unauthorized access by third parties. We also require that parties to whom we provide personal



information follow these same procedures. Unfortunately, the transmission of information over the Internet is not completely secure. Therefore, we cannot guarantee the complete security of the personal information you provide to us over the Internet. You acknowledge and agree that we will not be liable for any unauthorized use, dissemination, damage or destruction of your personal information, except where we are required to accept such liability under the Act and the RODO. Once we have received your personal information, we will use security procedures and features to prevent unauthorised access to it.

(11) WHERE WE STORE YOUR PERSONAL DATA

In general, the personal data we collect is stored on the Portal, which appropriately uses protected cloud services. Access to the Portal is strictly limited by security features. FLEXIDEA only uses cloud services of the European Union or countries whose legal requirements for the protection of personal data are equivalent to those of the European Union.

Your personal data may from time to time be transferred to, and stored at, a destination outside the European Union, in particular where the contractors for any of the services offered through our site are based outside the European Union. Your personal data may also be processed by staff operating outside the European Union (if such staff work for us) or for one of our suppliers (if we use such suppliers). By submitting your personal data to us, you consent to the transfer, storage or processing of your personal data. We will take all reasonable steps to ensure that your personal information is treated securely and in accordance with this Policy.

(12) DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

(A) INTRODUCTION

We may share your personal information with third parties where you have consented to this or in the circumstances described below.

(B) DISCLOSURE OF INFORMATION TO THIRD PARTIES FOR THE PROVISION OF SERVICES

When you use the services available on the Portal (e.g. by submitting an Invoice for financing or concluding a Contract), we may disclose your personal data to relevant third parties with whom you conclude contracts (contractor / invoice debtor), in order to ensure that the contracts confirmed by the Invoice have been duly performed.

We may also disclose your personal data to third parties for the purpose of assessing your creditworthiness of your application, please refer to the Terms and Conditions for details, and by giving appropriate consent in relation to business information agencies.

We may also disclose your personal data to a person who provides outsourced services to us - IT, legal, financial, postal, accounting or auditing services, provided that the provider of these services undertakes to us not to disclose your personal data to third parties and enters into an appropriate agreement with us, most commonly a contract for the entrustment of the processing of personal data.

With your consent, we are granted the right to transfer your personal data to an appropriate, licensed credit reference agency which will use the data received to maintain a register enabling persons with a legitimate interest to assess the creditworthiness of persons on the register. By giving separate consent or accepting an Offer of Assignment, you consent to the transfer of relevant information.

(C) DISCLOSURE OF INFORMATION FOR LEGAL OR REGULATORY REASONS

We may disclose your personal information if we are required to do so to comply with a legal obligation or to enforce, apply or fulfil our terms and conditions and other agreements, or to protect the rights, property or safety of our customers or others. This includes sharing information with other companies, regulators and organizations to protect against fraud or other crime and to reduce credit risk.

We use a number of third-party organizations to help us provide professional services to our customers (e.g. fulfilment agencies, call centers, web designers, IT developers). These organizations act as data



processors and are subject to strict controls on how they can/cannot use your personal data, and we remain responsible for protecting this data.

(13) CAN I FIND OUT WHAT PERSONAL DATA FLEXIDEA IS HOLDING ON ME?

Under the RODO, you have the right to request a copy of the personal data that FLEXIDEA holds about you. Please make your request by emailing rodo@flexidea.eu.

(14) NOTIFICATION OF INFRINGEMENT

FLEXIDEA will inform you of a breach of your personal data within 72 hours of becoming aware of such a breach. We hope that nothing of the kind will ever happen :).

(15) MARKETING

If you have consented, we may send you marketing materials about the products or services we offer.

When you receive marketing communications from us, you will have the opportunity to unsubscribe from marketing emails or newsletters.

(16) DELETION OF USER ACCOUNT

You may choose to close your account on our Service at any time. We will then cease processing your personal data for any new purposes, but such closure will not affect our ability to retain and process any information required or to comply with any legal obligations or to complete any services that are in progress.

(17) YOUR RIGHTS UNDER RODO.

As a User you have the right to:

- access to your data in accordance with Article 15 of the RODO,
- rectification of data in accordance with Article 16 of the RODO,
- erasure of personal data in accordance with Article 17 of the RODO,
- to restrict processing in accordance with Article 18 of the RODO,
- object to the processing of personal data in accordance with Article 21 of the RODO,
- data portability in accordance with Article 20 of the RODO,
- lodge a complaint to the supervisory authority - the President of the Office for Personal Data Protection (current contact details are available on the website <https://uodo.gov.pl/>).

The exercise of each of the above-mentioned rights can be done by indicating your requests and sending them to the Administrator at rodo@flexidea.eu.

(18) COOKIES

1. INTRODUCTION

1. Please be informed that, like many other websites, FLEXIDEA uses cookies and similar technologies. A cookie is a small amount of data that is sent from our server to your browser and stored on your device's hard drive. Information collected by cookies or similar technologies may include the date and time of your visit and how you use the site.
2. Cookies are used by us within the Portal. The Portal also uses third-party cookies for analytical purposes to improve your overall experience on the Site.
3. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and stored by the browser. This identifier is then sent back to the server each time the browser requests a page from the server.
4. Cookies typically do not contain any personally identifiable information about you, but the personal information we hold about you may be linked to information stored and derived from cookies.



2. YOUR CONSENT TO OUR USE OF COOKIES

By continuing to use the Portal, you consent to our use of cookies. If you do not consent to our use of cookies, please see the next section.

3. BLOCKING OUR USE OF COOKIES

You can block the use of cookies by activating the appropriate settings in your browser.

4. WHAT HAPPENS WHEN YOU BLOCK COOKIES

In order to use certain parts of the Portal, your web browser must accept cookies. If you do not agree to this or block cookies, some aspects of the Portal may not function properly and you may not be able to access all or parts of the Portal.

5. COOKIE MANAGEMENT

Most browsers allow you to refuse to accept cookies and to delete them. The methods of doing this vary depending on the browser and its version. However, you can find up-to-date information on how to block and delete cookies using the links below:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

6. WHAT WE DO WITH COOKIES

- 1. We use session cookies to allow Portal to uniquely identify your browsing session on Portal, which allows us to coordinate this information with data from Portal's server. Such cookies are stored temporarily during your browsing session and are deleted from your device when you close your browser.
- 2. We also use persistent cookies, which can be stored on your device for a set period of time and are not deleted when you close your browser, if we need to know who you are for more than one browsing session. For example, we use these types of cookies to save your preferences so that they are remembered on your next visit, or to keep you logged in if you leave the site.
- 3. We may also use cookies if they are necessary for the operation of the Portal, for example to remember that you are logged into the Portal during a session.
- 4. We use "analytical" cookies. These and other information allow us to calculate the total number of people using the Portal and to determine which features of the Portal are most popular.
- 5. We use this information to improve the Portal. In general, we do not store any personal information that you may provide to us in cookies.

7. MORE INFORMATION

The table below provides more information about the different cookies used on the Website and the purposes for which they are used.

Google Analytics (third-party cookie)	These cookies allow us to store information such as the length of time you visit the Portal, whether you have visited the Portal before and the website you visited before coming to the Portal. More information about Google Analytics can be found at: http://www.google.com/intl/en/analytics/privacyoverview.html .
Google AdWords	These cookies enable us to promote our services on the internet.



More information about Google AdWords can be found at:

<https://adwords.google.com/intl/en/home> .

Authentication

This cookie enables us to keep you logged in even after you leave the website or close your browser.

Facebook and LinkedIn buttons

these cookies allow users to like or share items on social media sites.

<http://www.facebook.com/policy.php> ,

<http://www.linkedin.com/legal/privacy-policy>

Tawk.to

This cookie enables us to communicate with users via chat and helps us to carry out analysis.

Fullstory.com

t this cookie enables us to record and reproduce the actual user experience on our site, which helps us to support our customers, increase conversions and resolve issues faster.