

## **PRIVACY POLICY**

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1. The Company understands the importance of confidentiality and privacy of the information relating to the Clients and services provided to them.
2. The Company collects the information about the Client directly from the Client, especially during the registration process and from the other persons. This information mainly includes the Client's personal information. The commonly available information or already possessed by the Company without the duty of confidentiality shall not be regarded as confidential.
3. The Company may also collect the information about the Client's use of the Company Website, in particular about the frequency of the visits, the time spent on the Company's Website and about the actions taken.
4. The Company stores the information relating to the Client in the Company's databases in a manner which ensures their security and integrity. The Company undertakes actions and applies means to protect the information relating to the Clients from the access by unauthorized persons.
5. The Company is permitted to use and disclose the information relating to the Client which are required for the provision of services.
6. The Company may use the information relating to the Client in order to provide the information and updates about the Company's activity, including the promotion and marketing information, especially through the Client's email or by the phone.
7. The Company has the right to disclose the information relating to the Client to the third parties, in particular in the following circumstances:
  - a) in the cases provided by applicable law;
  - b) at the request of a court or other relevant public authority;
  - c) in order to take any necessary legal or administrative actions, including to pursue claims through the court or amicably;
  - d) to the third parties to the extent required for the execution of the Client's orders and for any other purpose related to the provision of services to the Client;
  - e) to complete the anti-money laundering procedures;
  - f) to the Company's professional advisors, provided that the advisor shall be informed about the confidentiality of provided information and obligated to maintain confidentiality;
  - g) to the service providers who create, maintain or process databases, offer record keeping services, email transmission services, messaging services or similar services which aim to assist the Company collect, storage, process and use the information relating to the Client;
  - h) to the service providers for statistical purposes;
  - i) to the marketing service providers, especially to the call centres, in such case the Company shall disclose only the Client's contact details;
  - j) at the Client's request or with the Client's consent;
  - k) to the legal successors of the Client;

- l) to the affiliates of the Company or any other company in the same group;
- m) in other necessary cases not provided in this point.

8. The telephone conversations between the Client and the Company may be recorded and kept by the Company. The recordings of conversations are the sole property of the Company. All such recordings of conversations may be used by the Company, among other things, in the case of a dispute between the Company and the Client. The Company is not obligated to make available the recordings of conversations to the Client.
9. The Client accepts that the Company and any other affiliate of the Company or any other company in the group may make direct contact with the Client, in particular by phone and email, in order to offer their services and products.
10. The Company shall not store the information relating to the Client longer than required. In many cases the information may be stored for considerable periods of time. The retention periods shall be determined taking into account the type of stored information and the purpose for which the information was collected.
11. At any time, the Client may request to change or delete the personal information. The Company shall change or delete the information in accordance with the Client's instructions, except when their further storage is required by the applicable law or to safeguard the activity or claims of the Company.