

PRIVACY AND PERSONAL DATA PROTECTION POLICY AND WEA PORTAL REGULATIONS

specified in accordance with applicable regulations, including 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 (General Data Protection Regulation) (“**GDPR**”) and other regulations of the law of the European Union and the Republic of Poland.

1. This document shall be applicable to internet portal www.warsawequityadvisors.com (“**WEA Portal**”).
2. The data controller and the entity which posts content to WEA Portal is **Warsaw Equity Advisors sp. z o.o.** having its registered office in Warsaw at ul. Marszałkowska 126/134, 00-008 Warsaw, registered in the National Court Register’s Business Register under number KRS: 152677 (“**WEA**”).
3. The WEA Portal is an **internet (information) showcase website** and neither WEA nor any company from the capital group of WEA, offers any services, goods or benefits upon individual request of Users (as defined below) through it.
4. WEA does not provide electronic services within the meaning of the Act of 18 July 2002 on electronic provision of services.
5. Having regard to the rights of users visiting the WEA Portal (“**Users**”), including the right to respect privacy and protection of personal data which stem from regulations of the law, **if the Users’ personal data should be processed, WEA will be their data controller** and such data will be processed in accordance with WEA’s **Personal Data Protection Policy** whose most important principles have been attached hereto.
6. Users can browse through WEA Portal content in any way they like to learn information about WEA.
7. WEA Portal can use cookies, i.e. small text files sent to the visiting computer which identify it in a way needed to simplify and accelerate the WEA Portal. The cookies are harmless to the computer, as well as the User and their data. **Every User can switch them off in their browser settings.**
8. Switching off or blocking the cookies might lead to incorrect operation of the WEA Portal. If a given User’s browser supports cookies, it means consent to the use of cookies by WEA Portal.
9. The WEA Portal uses a third-party website viewing analysis service. The service uses cookies to make it possible for WEA to analyze how Users use the WEA Portal.
10. Cookie files are not used to identify the User and User identity is not specified on their basis.
11. WEA uses cookie files and other similar technologies for the purposes of creating statistics which help it understand how Users use the WEA Portal thus making it possible to improve its structure and content. Cookie files will not be used to provide services, offer goods or other marketing activities addressed to Users.
12. WEA also reserves the right to carry out maintenance activities in connection with modification of WEA Portal.
13. WEA reserves the right to temporarily stop the availability of WEA Portal in the internet if there is a malfunction.
14. Author’s economic rights in graphic elements of the WEA Portal, including WEA’s logo, as well as the arrangement and composition of those elements as well as industrial property rights are vested exclusively in WEA. Users must not use graphic elements and their arrangement and composition as well as labels covered by rights vested in WEA.
15. This document shall be governed and construed in accordance with the Polish law.
16. If any provision of this document is ruled invalid under a final and binding court decision, the remaining provisions shall remain in force.
17. Any and all disputes shall be settled by the competent common court.
18. This document shall apply to all the visitors to the WEA Portal.

Attachment:

PRINCIPLES OF PERSONAL DATA PROTECTION

1. What is GDPR?

GDPR stands for 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 which will apply across the European Union, including Poland, from **25 May 2018**. It is the purpose of GDPR to specify comprehensive conditions of protection of personal data of natural persons. GDPR introduces a number of new issues concerning rights of natural persons. GDPR's goals include providing natural persons with detailed information about the processing of their personal data and the principles of their processing as well as the rights vested in the data subject.

2. Who is the controller of your personal data?

The data controller is Warsaw Equity Advisors sp. z o.o. having its registered office in Warsaw at ul. Marszałkowska 126/134, 00-008 Warsaw, registered in the National Court Register's Business Register under number KRS: 152677 ("WEA"). Given the scale of its operations, WEA has not appointed any Data Protection Officer and all the obligations stemming from GDPR and other regulations of the law shall be executed directly by WEA.

3. What are the grounds for the processing of your personal data?

WEA shall process your personal data on the following grounds: (1) granted consent, (2) performance of activities connected with conclusion, execution or termination of an agreement concluded between WEA and you (3) in connection with the exercise of its obligations under regulations of the law, (4) in connection with the exercise WEA's legitimate interest for the purposes specified below.

4. Which personal data will be processed?

WEA shall only process those personal data access to which was provided to it as a result of your use of the WEA Portal, i.e. in particular, email address, personal data included in email.

5. What is the purpose of the processing of your personal data?

Your personal data will be processed for the following purposes:

- a. **WEA running its business activity,**
- b. **exercise of its obligations under the regulations of the law,**
- c. **activities connected with conclusion, exercise or termination of an agreement** concluded between WEA and you and performance of other activities connected with such an agreement, including activities preceding its conclusion (if such an agreement is concluded),
- d. **exercise of WEA's legitimate interest**, including ensuring the security of people and property rights of WEA, privacy and dignity of those persons or seeking or defense of WEA's claims or rights (e.g. identification, defense and seeking of claims by WEA, use of providers of IT, legal, bookkeeping, business services provided to WEA), running civil, administrative, criminal proceedings etc.

6. What is profiling?

Your personal data **will not be** profiled by WEA. Profiling shall be understood as processing of personal data for the purposes of tailoring an offer, services or goods to your interests and needs.

7. Will any automated decisions, including profiling, be taken with a significant impact on you?

WEA **shall not** make automated decisions in cases where you would be affected.

8. What are your personal data rights?

You have full access to your personal data. You can exercise your rights as specified below in a simple manner by requesting it via: email to office@warsawequity.com or directly in writing to WEA's address as specified in point 2 above. To make sure that you have the right to make said request we could ask you to provide additional information which will make it possible to identify you. As a data subject you have the right to:

- **request access to your personal data or have them rectified (Article 15 and 16 of GDPR),**
- **object to specific processing of your personal data (Article 21 of GDPR),**
- **have your personal data deleted (the right to be forgotten) or have the processing changed or restricted (Article 17 and 18 of GDPR),**
- **port and receive copies of your personal data (Article 20 of GDPR),**
- **not consent or withdraw your consent (if the consent has been granted),**
- **not to be subject to decisions based solely on automated processing.**

The rights provided under GDPR, in particular the rights specified above, can be exercised on the principles set out in GDPR and other regulations of the law. The scope of each of those rights and the situations when they can be exercised stem from the regulations of the law. The right which you can exercise will depend on e.g. the legal basis for our use of your data and the purpose of their processing.

9. To whom do we transfer your personal data?

Your personal data will be processed solely by WEA and third parties which provide WEA with services connected with its business activity under binding contracts and will process personal data on behalf of WEA (“**Processors**”). The Processors acting on behalf of WEA shall include in particular: entities which support our ITC systems or provide ITC tools to WEA, providers of advisory, consulting, audit, legal, tax, accounting etc. services to WEA.

10. To whom will your personal data be disclosed (personal data recipients)?

Only authorized personnel and co-workers of WEA or a Processor will be the recipients of your personal data. Personal data can also be disclosed to competent administration bodies, law enforcement or court bodies authorized under applicable regulations of the law. Moreover, persons or entities you consent to can be your personal data recipients.

11. How are your personal data protected?

WEA shall provide proper technological, physical, administrative and procedural means of data protection which shall be adequate to the scope of WEA’s business and the scope of personal data processing for the purposes of protecting and ensuring confidentiality, correctness and availability of processed personal data as well as protection against unauthorized use or unauthorized access to personal data as well as protection against breaches of personal data security.

12. What is the processing period of your personal data?

Your personal data will be processed until you withdraw your consent (if granted) or for a period necessary for the purposes specified in point 5 above, however not longer than required. After the lapse of said period, personal data will be permanently removed, however WEA can keep a limited part of your personal data for the purposes of proving compliance with the law. The processing periods of specific personal data cannot be combined. Every separate bit of personal data can be processed separately according to separate purposes and legal bases. Moreover, the data can be processed for the period during which you can seek claims against WEA in connection with a performed agreement or for the period during which there is a risk of legal consequences for WEA.

13. Will your personal data be transferred outside the European Economic Area (EEA)?

At the moment, we do not plan to transfer your data outside of the EEA (it includes the European Union, Norway, Liechtenstein and Iceland). However, it might turn out that as part of our business operations we will decide to transfer the data outside of the EEA solely in the scope permitted by law.

14. Where can you file a complaint about illegal personal data processing?

If you decide that your personal data are processed illegally, you have the right to complain with the Inspector General for Personal Data Protection or, from 25 May 2018, with head of the Personal data Protection Office.

15. How to contact WEA?

To execute the rights granted to you under GDPR, you can contact WEA by sending email to office@warsawequity.com or writing to **Warsaw Equity Advisors sp. z o.o., ul. Marszałkowska 126/134, 00-008 Warsaw.**