**Privacy Policy**

**§1**

This Privacy Policy, hereinafter referred to as the “Policy", defines the rules for the collection, processing and use of Users' Personal Data by AIQLABS Sp. z o.o.

**§2**

The terms used in this Policy shall have the meaning assigned by the law or in this paragraph:

**Personal Data** - data within the meaning of art. 4 item 1) of 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 referred to as the "Regulation"), i.e. all information regarding an identified or identifiable natural person;

**Personal data processing** - all operations or sets of operations performed on Personal Data in an automated or non-automated way, such as collecting, recording, organizing, storing, adapting or modifying, downloading, browsing, using, disclosing, distributing or otherwise distributing, matching or combining , limiting, removing or destroying;

**User** - a natural person making legal transactions with the entrepreneur not directly related to its business or professional activity, reporting the will to conclude a loan agreement with the Company;

**Loan Information Exchange Platform** - means an online platform that provides a confidential information exchange service enabling lenders to cooperate within the meaning of the data processing agreement; The list of participants is available at <http://www.credit-check.pl/uczestnicy/>

**Service** - a web application system available on the www.aiqlabs.pl domain that serves the User to use the Services;

**Company** - means a company operating under the name AIQLABS spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw at ul. Inflancka 11/27, 00-189 Warsaw, entered into the Register of Entrepreneurs of the National Court Register maintained by the District Court for the Capital City of Warsaw in Warsaw, 12th Economic Department of the National Court Register under the number KRS: 0000551150, NIP: 5252607460, REGON: 360301004

**§3**

The Company collects, processes and uses Personal Data of natural persons in accordance with the applicable law, in particular in accordance with the provisions of the Regulation.

**§4**

1. The user who wishes to apply for a loan must set up a profile on the Website

by providing the following data:

● First name,

● Surname,

● Registered address,

● Correspondence address,

● PESEL number,

● ID card series and number,

● Marital status,

● Number of dependent children,

● Professional status,

● Industry in which the User is employed,

● Monthly income,

● E-mail address,

● Telephone number,

● Employer's name and telephone number.

**§5**

The Company processes Users' Personal Data in accordance with the applicable law, i.e. pursuant to 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 the "Regulation").

**§6**

I. The company is the Personal Data Controller within the meaning of art. 4 item 7 of the Regulation, who independently or jointly sets the purposes and methods of personal data processing;

1. The Company, acting on the basis of a written agreement referred to in art. 28 of the Regulation, may entrust the processing of data to other entities.

**§7**

1. The company implements safeguards to achieve a certain level of personal data protection. The implementation of personal data protection principles is based on:

a) risk analysis, in accordance with the requirements set out in art. 24 of the GDPR,

b) implementation of privacy protection principles at the design stage and default data protection (PIA/Privacy by design/Privacy by default), in accordance with the requirements specified in art. 25 of the Regulation,

c) implementing the principles of conducting the assessment of the effects of personal data processing (DPIA), in accordance with the requirements set out in Art. 35 and 36 of the Regulation.

2. The Company applies the necessary technical and organizational measures required by current personal data protection regulations necessary to undertake all legal measures to secure personal data sets.

3. The company keeps a register of processing activities.

4. The company appointed an inspector of personal data protection.

**§8**

In fulfilling the obligation arising from art. 13 of the Regulation we present information regarding the processing of your personal data by the Company.

I. **Legal basis**

Information is provided on the basis of art. 13 of 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 the "Regulation")

I. **Data Controller**

The Personal Data Controller within the meaning of art. 4 item 7) of the Regulation, who independently or jointly sets the purposes and methods of personal data processing is AIQLABS spółka z ograniczoną odpowiedzialnością of Warsaw, ul. Inflancka 11/27, 00-189 Warsaw, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for the capital city of Warsaw in Warsaw, 12th Economic Department of the National Court Register under the number KRS: 0000551150, NIP: 5252607460, REGON: 360301004 (hereinafter “AIQLABS” or the “Company”)

I. **Contact details**

The personal data controller can be contacted via e-mail: kontakt@aiqlabs.pl or by phone at: The Company appointed a Data Protection Officer, who can be contacted in writing at the AIQLABS mailing address (AIQLABS Sp. z o.o of Warsaw, ul. Inflancka 11/27, 00-189 Warsaw) or via e-mail: iod@aiqlabs.pl. You can contact the data protection officer on all matters relating to the processing of personal data and the use of rights related to the processing of personal data.

I. **The purposes and the legal basis of processing:**

Your data will be processed by the Company for the main purposes:

I. considering the application for a loan or taking actions related to the conclusion of a consumer credit agreement, and in the case of a consumer credit agreement also in relation to its performance or termination and performance of other activities related to the agreement, such as creditworthiness assessment and credit risk analysis , including the use of automated systems which make credit decisions - the legal basis for the processing of personal data is in this case art. 6 section 1 letter b) of the Regulation.

II. marketing (transmitting, displaying or sending commercial information by e-mail, telephone and letter) during the term of the consumer credit agreement - legal basis for the personal data processing is art. 6 section 1 letter f) of the Regulation, consisting in the right to conduct marketing of own products and services

III. marketing (transmitting, displaying or sending commercial information by e-mail, telephone and letter) after the termination of the consumer credit agreement or in the event that it is not concluded - legal basis for the personal data processing is art. 6 section 1 letter a) of the Regulation

IV. considering your potential complaints and claims - legal basis for the personal data processing is the legitimate interest of the Controller, i.e. art. 6 section 1 letter f) of the Regulation, consisting in considering the application which is the subject of a complaint and defense against potential claims.

Your data may also be processed (if it will be related to the AIQLABS business and secondary purposes will be linked to the main goals) for the following purposes: a) data archiving, b) conducting internal audits in AIQLABS, c) other statistical surveys or historical or scientific research, e) business, economic or legal advice which is provided to AIQLABS.

I. **Categories of processed data: AIQLABS** processes your personal data in the area of:

I. identification data of a person, including: PESEL, first and last names, ID card details, date and place of birth, sex, citizenship; marital status, number of dependent children, professional status, industry in which you work, monthly income,

II. address and contact details including e-mail address and telephone number;

III. data relating to the obligation, including: the purpose and source of the commitment, amount and currency, balance, period and terms of repayment of the obligation, legal security, course of the obligation, data on loan applications.

I. **Data source:** We only collect personal data from data subjects (i.e. persons submitting loan applications, people consenting to the processing of personal data, persons submitting complaints).

I. **Voluntary or compulsory data provision:** Providing data is voluntary, but it is required to conclude and implement a consumer credit agreement. I. **Period during which data will be processed:** Your personal data will be processed by AIQLABS:

I. for the purposes of assessing creditworthiness and credit risk analysis, including profiling - for the duration of your obligation and if the result of the assessment is to take a loan, for a period of 3 years from the data collection.

II. for the purposes of the consumer credit agreement - for the duration of the contract

III. for marketing purposes during the term of the consumer loan agreement - for the duration of the contract;

IV. for marketing purposes after the termination of the consumer credit agreement or if it is not concluded - until the consent to the processing of personal data is withdrawn;

V. for the purpose of considering your complaint and claims - until the limitation period for your potential claims for violation of data processing

VI. for the purpose of debt collection and redress by AIQLABS - until your potential claims are prescribed

VII. for purposes related to conducting court proceedings - the data may be processed up to 10 years from the date of issuing a final decision terminating the proceedings;

VIII. for the purpose of detecting and preventing fraud - for the duration of the contract, and then for the period after which contractual claims expire and in the event of the Company's investigation or notification to the competent authorities - for the duration of such proceedings;

IX. for the purposes of creating statements, analyzes and statistics - for the duration of the contract, and then no longer than for the period after which the claims under the contract expire;

X. for archival purposes - after the expiry of a given legal relationship (i.e. for example an agreement) personal data concerning the activities of these persons on behalf of the entrepreneur, institution or organizational units are processed for 6 years and the remaining personal data of natural persons are processed for up to 10 years , unless the law provides for a shorter period. If there is a dispute, court proceedings or other proceedings (especially penal proceedings), the archiving period will be counted from the day when the dispute is finally concluded, and in the case of many proceedings of final termination of the last one, regardless of how it ends, unless the law provides for a longer period data storage or longer period of limitation for the claims / law concerned;

In cases when AIQLABS obtains data from databases maintained by other entities or data provided by other entities (e.g. those specified in section 7 of this Privacy Policy). The processing period depends on the purpose of the transfer or withdrawal of consent).

I. **Recipients of data** a) Your personal data may be made available by AIQLABS to entities authorized to receive it on the basis of your consent to assess creditworthiness and credit risk analysis, i. Biuro Informacji Kredytowej S. A., of Warsaw, ul. Zygmunta Modzelewskiego 77A,
ii. Krajowy Rejestr Długów Biuro Informacji Gospodarczej S.A. Of Wrocław on ul. Armii Ludowej 21, iii. ERIF Biuro Informacji Gospodarczej S.A. of Warsaw, Plac Bankowy 2, 00-095 Warszawa, iv. Biuro Informacji Gospodarczej InfoMonitor S. A. of Warsaw, ul. Zygmunta Modzelewskiego 77, v. Krajowe Biuro Informacji Gospodarczej of Cracow, ul. Lublańska 38, vi. CRIF Services Sp. z o.o. of Cracow, address: ul. Lublańska 38, vii. Participants of the Loan Information Exchange Platform, The list of participants is available at http://www.credit-check.pl/uczestnicy/ viii. Kontomierz.pl Spółka z ograniczoną odpowiedzialnością of Warsaw, ul. Prosta 32, ix. Blue Media S.A. ul. Powstańców Warszawy 6, 81-718 Sopot b) Your personal data may be transferred by AIQLABS to other entities for marketing purposes, such as marketing agencies, event agencies, based on your consent. c) Your personal data may also be transferred to entities that process data on behalf of AIQLABS, such as IT service providers - such entities process data as subcontractors, based on a contract with the Company and only in accordance with the Company's instructions. d) Your personal data may be transferred to entities that process data on behalf of AIQLABS, such as external tax and accounting offices, external law firms and debt collection companies based on entrusting agreements for purposes related to financial, legal and debt accounting services.

I. **Automated decision-making:** In the creditworthiness assessment process, AIQLABS makes decisions in an automated manner based on data provided by you and data obtained from external databases. These decisions are made automatically based on the scoring model used by the Company. Decisions taken in this automated manner influence the decision whether to grant or refuse a loan or to offer you a specific financial product. Automated decision-making for purposes of assessing creditworthiness is necessary for the purpose of concluding a consumer credit agreement.

1. **The rights of the data subject** You have the right to access your data and the right to demand rectification (if they are inconsistent with the actual state), deletion, processing restrictions (in cases provided by law). To the extent that the basis for the processing your personal data is the premise of the legally legitimate interest of the controller, you have the right to object to the processing of your personal data. To the extent that the processing of your personal data is based on your consent, you have the right to withdraw your consent. The consent withdrawal does not affect the lawfulness of the processing which was carried out on the basis of consent prior to its withdrawal. To the extent that your data is processed for the purpose of conclusion and performance of the contract or processed on the basis of consent, you also have the right to transfer your personal data, i.e. to receive personal data from the controller, in a structured, commonly used machine-readable format. You may send the data to another data controller. The right to transfer data does not apply to data which constitute a trade secret, it cannot adversely affect the rights and freedoms of others, including trade secrets or intellectual property, and it will be implemented in a technically possible scope. The first data copy is free. You also have the right to lodge a complaint with the supervisory body dealing with the personal data protection.

**Cookies Policy**

1. Depending on the computer settings that the User will use during the visit at www.aiqlabs.pl, the so-called cookies will be saved on the computer.
2. Cookies are used to collect information about the use of services on the website www.aiqlabs.pl and to ensure the best possible level of accessibility and use of these services. Cookies do not adversely affect the computer or the installed software, nor do they intentionally affect the performance, operation, configuration of the computer and the installed software.
3. Cookies do not contain any information that would allow the User to be identified and are not used to process personal data. Data collected using cookies are only statistical and concern the activity on the website www.aiqlabs.pl. Turning off the option in the web browser that allows you to save "cookies" does not prevent the use of the website www.aiqlabs.pl but it may, cause some difficulties or restrictions in the use of the Website.