

# Allegro Finance sp. z o.o. Privacy protection policy

## Appendix of Allegro Finance Terms & Conditions

(...)

## Section 2. Source of Personal Data Processed by the Company

(...)

We can obtain your data from various sources:

(...)

G. From parties responsible for or supporting the application of national or international restrictive measures. In addition, we may obtain your data for the purposes of debt collection, [their assignment](#), prevention of fraud and abuse, and counteracting money laundering, from parties that have a legal or factual interest in providing your Personal Data to us.

(...)

## Section 3. Scope of Personal Data Processed by the Company

(...)

A unique identification and decision making about the possibility of establishing a relationship with you or a party associated with you, as well as the need to prevent financial crimes may require the processing of Personal Data not specified in the Policy. As a rule, the Company processes data in the following scope:

A. Users who are natural persons (including those using payment instruments issued by the Company):

- Identification data, e.g., first name(s), last name(s), company name, country of birth, nationality, date of birth, unique identification numbers (e.g., PESEL (Personal ID No.), NIP (Tax Identification Number), REGON (National Business Registry Number), bank account number), image of the identity document with its data (including image, document series and number, expiration date), image, Biometric Data;
- Contact details, e.g., address of residence, mailing address, address of the principal place of business, contact number, email address;

- Transaction data, e.g., the delivery address of the goods ordered using the Company's services, together with the value of the order, the delivery option, and information about the subject of the transaction and its progress;
- Business information contained, i.a., in the Register of Entrepreneurs of the National Court Register (KRS), Central Registration And Information On Business (CEIDG), National Register of Insolvent Debtors, or appropriate foreign registers;
- Information on liabilities, such as those contained in notices of assignment, enforcement titles;
- Information about the account on the online platform operated by the Company, e.g., its type, name, date of establishment;
- Information related to the device used to use the Company's services, e.g., cookies, IP address;
- Other Personal Data disclosed in particular by the User and public authorities in the course of using the Company's services (e.g., during the complaint or enforcement procedure);

(...)

## H. Creditors:

- Identification data, e.g., first name(s), last name(s), unique identification numbers (e.g., PESEL (Personal ID No.), NIP (Tax Identification Number), REGON (National Business Registry Number));
- Contact details, e.g., mailing address, contact number, email address;
- Other Personal Data disclosed in particular by a creditor or public authorities (e.g., in the course of enforcement, security, complaints proceedings, or proceedings related to the assignment agreement).

(...)

## Section 4. The purpose and legal grounds for the processing of your personal data by the Company

(...)

### CONCLUDING AN AGREEMENT WITH THE COMPANY AND ITS PERFORMANCE

(...)

In connection with the performance of services, we process your Personal Data according to the rules described in the table. In addition, your Personal Data may be processed for other purposes, including analytical and marketing purposes, and to guarantee the security of our services, as you will learn from further sections of this part of the Policy.

<b>Purpose of Personal Data processing</b>	<b>Legal grounds for Personal Data processing</b>	<b>Period of storage of Personal Data for a specific purpose (retention period)</b>
<b>Taking steps related to the conclusion of an agreement with the User who is a natural person for electronically provided services and in the scope of payment services</b>	Article 6(1)(b) of the GDPR (necessary for entering into and perform an agreement) – Personal Data required for the conclusion of the agreement	Until the service is discontinued, or until it is found that the service can no longer be provided
<b>Taking steps related to the conclusion of an agreement with the User through a representative for electronically provided services and in the scope of payment services</b>	Article 6(1)(f) of the GDPR (legitimate interest of the Company, consisting in establishing a relationship with the User) — Personal Data necessary to conclude an agreement	Until the service is discontinued, or until it is found that the service can no longer be provided
<b>Application of financial security measures provided for in the anti-money laundering regulations</b>	Article 6(1)(c) and Article 9(2)(g) of the GDPR in conjunction with Article 34 of the Anti-Money Laundering Act.	5 years from the end of the cooperation with you/a party associated with you, or from the last occasional transaction, except where the supervisory authority instructs that Personal Data be stored for longer
<b>Handling complaints, including solving technical problems</b>	Article 6(1)(b) of the GDPR (legitimate interest of the Company in the protection of the Company's and the User's rights)	Until the processing of the complaint completed, or until the technical issue is resolved
<b>Exercise or defense of legal claims arising from an agreement or related to the provision of services, including debt collection or participation in court, arbitration, and mediation proceedings</b>	Article 6(1)(f) of the GDPR (legitimate interest of the Company in the protection of the Company's rights)	Until the last day of the calendar year following the expiration of a 3 years' period after the service is discontinued. If necessary, personal data will be processed until the final completion of civil, enforcement, administrative, or criminal proceedings that require the processing of Personal Data
<b>Exercise or defense of legal claims in connection with applying for and not concluding</b>	Article 6(1)(f) of the GDPR (legitimate interest of the	12 months starting from the year following the year in

<b>an agreement for Allegro Finance services</b>	Company in the protection of the Company's rights)	which the agreement was not concluded
<b>Execution of public authority decisions</b>	Article 6(1)(c) (processing is necessary for compliance with a legal obligation under specific regulations)	Until the purpose of processing has been fulfilled
<b>Compliance with statutory obligations under tax and accounting regulations</b>	Article 6(1)(c) of the GDPR in conjunction with Article 70 § 1 of the Tax Ordinance Act and Article 74 of the Accounting Act (processing necessary for compliance with a legal obligation)	5 years from the beginning of the year following the fiscal year in which the economic event requiring the processing of your Personal Data occurred

(...)

## Section 5. Users' Rights in the Context of Personal Data Processing and How to Exercise Them

(...)

Note also that you have the **right to lodge a complaint** regarding our processing of your Personal Data with the supervisory authority, i.e., the President of the Personal Data Protection Office (address: Prezes Urzędu Ochrony Danych Osobowych, [ul. Moniuszki 1A, 00-014 Warszawa](#) ~~ul. Stawki 2, 00-193 Warszawa~~).

(...)

## Section 7. Transfers of Personal Data to Countries Outside the European Economic Area

Your Personal Data may be transferred outside the European Economic Area, including to:

- ~~A.~~ SFDC UK, Ltd (SalesForce) with its registered office in London, UK, in connection with the use of Personal Data processing services offered by this party to ensure the provision of services by Allegro Finance.
- ~~B.~~ Regulatory DataCorp Limited, with its registered office in London, UK, in connection with the use of services to support analyses aimed at preventing money laundering and terrorist financing.

At the same time, as part of cooperation with processors, data processing may be further entrusted to parties that may transfer data to countries outside the European Economic Area. Parties that systematically process data for Allegro Finance include:

- Genesys Cloud Services BV with its registered office in Amsterdam, the Netherlands, in connection with the use of Personal Data processing services offered by this party to ensure the provision of services offered by the Company as part of Allegro Finance;
- ~~A.~~ Google Cloud Poland sp. z o. o. with its registered office in Warsaw, Poland, in connection with the use of Personal Data processing services offered by this party and provided outside the European Economic Area to ensure the provision of payment services by Allegro Finance;
- Microsoft Ireland Operations, Ltd with its registered office in Dublin, Ireland, in connection with the use of Personal Data processing services offered by this party to ensure the provision of services offered by the Company as part of Allegro Finance;
- ~~B.~~ SFDC Ireland, Ltd (SalesForce) with its registered office in Dublin, Ireland, in connection with the use of Data processing services offered by this party to ensure the provision of services by Allegro Finance.
- Snowflake Computing Netherlands, B.V. with its registered office in Amsterdam, the Netherlands, in connection with the use of Personal Data processing services offered by this party to ensure the provision of services offered by the Company as part of Allegro Finance.

(...)