

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

## Appendix to Allegro Finance Terms & Conditions

### Section 1. Definitions, Purposes, and Scope of Application of the Policy

(...)

#### PERSONAL DATA CONTROLLER, PURPOSES AND SCOPE OF THE POLICY

(...)

The Policy sets out, in particular, the scope and legal grounds for processing your Personal Data, which we collect in connection with your or your associated parties' use of services we provide. Detailed rules for the processing of ~~personal data~~ [Personal Data](#) by Allegro Finance can also be found in the Terms & Conditions issued by us or partners we cooperate with.

(...)

### 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 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~~ **Personal Data** disclosed in particular by the User in the course of using the Company's services (e.g., during the complaint procedure);

(...)

E. Parties to the transaction (persons making the payment and beneficiaries of the payment, including those using payment instruments issued by the Company **and those using payment services provided by the Company**):

- Identification data, e.g., first name(s), last name(s), company name, unique identification numbers (e.g., PESEL (Personal ID No.), NIP (Tax Identification Number), REGON (National Business Registry Number));
- **contact details (e.g. street and house number, postal code, city, e-mail address, telephone number, details given on the delivery form);**
- Transaction data, e.g., the subject matter, course, and procedure of the transaction, bank account numbers, information about payment tools used, **information on the complaint procedure - in particular in the case of a refund procedure;**
- Information related to the device (including the payment tool) used to carry out the transaction;
- Other Personal Data that constitutes information accompanying transfers of funds, and disclosed during the complaint procedure;

(...)

G. Legal successors:

- 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~~ **Personal Data** disclosed in particular by a legal successor (e.g., during the complaints procedure).

In the case of direct contact with the User service team/helpline of the Company, its recording may also be processed, about which you will be informed.

The application of financial security measures may involve the processing of data relating to the holding of, or association with, political positions, which is related to the determination under the AML and terrorist financing law. whether:

- you hold a politically exposed position,
- you are a family member of a politically exposed person or a person known to be a close associate of a politically exposed person.

## 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

Applying for the use of Allegro Finance services requires, in principle, the Company obtaining the Personal Data of Users, their representatives, and the beneficial owners of their business activity.

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</b>	Article 6(1)(f) of the GDPR (legitimate interest of the Company, consisting in	Until the service is discontinued, or until it is

<p><b>for electronically provided services and in the scope of payment services</b></p>	<p>establishing a relationship with the User) — Personal Data necessary to conclude an agreement</p>	<p>found that the service can no longer be provided</p>
<p><b>Application of financial security measures provided for in the anti-money laundering regulations</b></p>	<p>Article 6(1)(c) and Article 9(2)(g) of the GDPR in conjunction with Article 34 of the Anti-Money Laundering Act.</p>	<p>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</p>
<p><b>Handling complaints, including solving technical problems</b></p>	<p>Article 6(1)(b) of the GDPR (legitimate interest of the Company in the protection of the Company's and the User's rights)</p>	<p>Until the processing of the complaint completed, or until the technical issue is resolved</p>
<p><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></p>	<p>Article 6(1)(f) of the GDPR (legitimate interest of the Company in the protection of the Company's rights)</p>	<p>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</p>
<p><b>Exercise or defense of legal claims in connection with applying for and not concluding an agreement for Allegro Finance services</b></p>	<p>Article 6(1)(f) of the GDPR (legitimate interest of the Company in the protection of the Company's rights)</p>	<p>12 months starting from the year following the year in which the agreement was not concluded</p>
<p><b>Compliance with statutory obligations under tax and accounting regulations</b></p>	<p>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)</p>	<p>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</p>



(...)

## Section 6. Personal Data Recipients

The recipients of your Personal Data may be:

- A. Parties authorized to receive such data under the law, including competent judicial authorities, in particular as part of Allegro Finance fulfilling its obligations provided for in the law and related to the provision of payment services;
- B. To the extent and for the time necessary to provide or perform services (including payment institutions) and in relation to these services — third parties, including parties engaged by Allegro Finance to perform actions related to the provision of services or which participate in (and benefit from) such services;
- C. Allegro sp. z o.o., to counteract fraud on the Allegro platform in connection with the payment services provided;
- D. Other parties, if this results from the terms of services provided by us and this Policy.

We cooperate with specialized providers of data storage services, analytical services, debt collection services, and IT services. In this case, your Personal Data will be processed exclusively on behalf of and for the purposes of Allegro Finance in accordance with the concluded data processing agreements.

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

(...)

Allegro Finance always relies on mechanisms ensuring an adequate level of protection, i.a., by using standard contractual clauses for the transfer of Personal Data to Personal Data processors established in third countries, as approved by the European Commission. To can obtain copies of such clauses, contact us at: [iod@allegrofinance.pl](mailto:iod@allegrofinance.pl).

Where you are transacting for an entity or account with a financial institution located outside the European Economic Area, Personal Data may be transferred by the Company outside the EEA on a one-off basis in order to complete a specific transaction. The transfer of Personal Data is necessary for the performance of the contract between the Company and the person using the Company's services, as well as for the transaction itself.

(...)