



Changes to the Allegro Finance sp. z o.o. Privacy protection policy from July 31, 2024

The document below takes into account the changes in the regulations concerning Allegro.pl, Allegro.cz and Allegro.sk

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

## Appendix to Allegro Finance Terms & Conditions

### ~~I. Who is the controller of your personal data?~~

~~Allegro Finance spółka z ograniczoną odpowiedzialnością [limited liability company] with its registered office at Wierzbiewice 1B, 61-569 Poznań ("we", "us", "Allegro Finance" or "Company") is the controller, i.e., the entity which decides how your personal data will be used.~~

### ~~II. How to get in touch with us for more information about the processing of your personal data?~~

~~Just write to our appointed Data Protection Officer. The contact details are below:~~

- ~~• email address: [iod@allegrofinance.pl](mailto:iod@allegrofinance.pl),~~
- ~~• mailing address: Inspektor Ochrony Danych Allegro Finance sp. z o.o., ul. Wierzbiewice 1B, 61-569 Poznań.~~

### ~~III. What are the sources of your data?~~

~~We have obtained your data from the following sources:~~

~~A. directly from you, in connection with the identification and verification process provided for in the Act on Counteracting Money Laundering and Terrorist Financing, the activities you performed while using the "Allegro Finance Service" and in connection with the updates you made to your data;~~

~~B. from Allegro sp. z o.o., which transfers your data to us in connection with your use of the "Allegro Finance Service". For more information, see Allegro Finance Terms & Conditions;~~

~~C. from publicly available sources including, inter alia, business registers, data published by courts (e.g., ineffective enforcement proceedings, bankruptcies, prohibitions on engaging in business activity), documents related to the performance of duties provided for in the Act on Counteracting Money Laundering and Terrorist Financing;~~

D. from persons representing you under a power of attorney granted to them.

## ~~IV. Scope of your personal data processed by Allegro Finance~~

~~A. personal data related to the process of identifying you and verifying your identity, which includes without limitation first and last name(s), nationality, PESEL personal identification number, date of birth, and country of birth – if you have not been assigned a PESEL number, details contained in the document that proves your identity, image, address of residence, contact number, email address, the name of your company, its NIP tax identification number and address of the principal place of business, information whether you are a politically exposed person, a representative of an entity cooperating/wishing to cooperate with its beneficial owner or Allegro Finance;~~

~~B. business information contained, inter alia, in the Register of Entrepreneurs of the National Court Register (KRS), Central Register and Information on Economic Activity (CEIDG), National Register of Insolvent Debtors;~~

~~C. personal data accompanying your payments, including your first and last name, address, and payer bank account number as information accompanying transfers of funds.~~

## ~~V. What are the purposes and legal basis for the processing of your personal data by the Company?~~

~~We process or may process your personal data for the following purposes:~~

~~A. taking actions necessary to enter into a payment service contract and provide a payment service pursuant to Article 6(1)(b) GDPR;~~

~~B. identifying and assessing money laundering and terrorist financing risks and preventing money laundering and terrorist financing pursuant to Article 6(1)(c) GDPR;~~

~~C. ensuring compliance with applicable laws, which includes processing your data for tax or accounting purposes pursuant to Article 6(1)(c) GDPR;~~

~~D. profiling your data in order to personalize communications and the content directed to you pursuant to Article 6(1)(f) GDPR or, depending on the context of the processing, pursuant to Article 6(1)(a) GDPR. The legitimate interest of Allegro Finance consists in conducting direct marketing of its services;~~

~~E. analytical and statistical purposes pursuant to Article 6(1)(f) GDPR – the legitimate interest of Allegro Finance consists in developing and improving its own services;~~

~~F. asserting or defending claims in connection with entering into a payment service contract and providing a payment service pursuant to Article 6(1)(f) GDPR – the legitimate interest of Allegro Finance consists in defending its business interests;~~



~~G. debt collection and conducting court, arbitration, or mediation proceedings pursuant to Article 6(1)(f) GDPR – the legitimate interest of Allegro Finance consists in defending its business interests;~~

~~H. preventing or prosecuting offenses pursuant to Article 6(1)(f) GDPR – the legitimate interest of Allegro Finance consists in defending its business interests;~~

~~I. archiving and in order to ensure accountability with regard to the personal data processing pursuant to Article 6(1)(f) GDPR – the legitimate interest of Allegro Finance consists in defending its business interests;~~

~~J. to contact you via the available channels, including WhatsApp or Messenger, pursuant to Article 6(1)(b) GDPR where this is necessary for the performance of the agreement, or pursuant to Article 6(1)(f) GDPR where the contact is not directly related to the performance of the agreement but occurs in response to a request.~~

## ~~VI. Who do we share your personal data with?~~

~~The recipients of your personal data are:~~

~~A. entities authorized to receive such data under applicable laws, including competent judicial authorities, in particular as part of Allegro Finance's fulfillment of its obligations provided for in applicable laws and related to the provision of payment services;~~

~~B. to the extent and for the time necessary to provide or perform services, and in relation to these services – third parties, including entities that Allegro Finance commissions to perform actions related to the provision of services or which participate in (and benefit from) these services;~~

~~C. Allegro sp. z o.o. to counter fraud on the Allegro website in connection with the payment services provided.~~

~~We cooperate with specialized providers of data storage services, analytical services, debt collection services, and IT services so that they may provide services to us. In this case, your personal data shall be processed exclusively on behalf of and for the purposes of Allegro Finance in accordance with the concluded agreements that entrust the processing of personal data.~~

## ~~VII. Do we transfer your data to countries outside the European Economic Area?~~

~~Your personal data may be transferred outside the European Economic Area including to the following entities:~~

~~A. SFDC UK, Ltd (SalesForce) with its registered office in London, UK, in connection with the use of its Personal Data processing services necessary for 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 entities that may transfer data to countries outside the European Economic Area. Parties that systematically process data for Allegro Finance include:~~

~~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 entity and carried out outside the European Economic Area necessary for the provision of services by 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 entity to ensure the provision of services by Allegro Finance.~~

~~Allegro Finance always operates on the basis of mechanisms ensuring an adequate level of protection, which includes the application of standard contractual clauses regarding the transfer of Personal Data to processors that have their registered offices in third countries, as approved by the European Commission. You can receive copies of such clauses from the Company by writing to us at [iod@allegrofinance.pl](mailto:iod@allegrofinance.pl).~~

## ~~VIII. How long do we store your personal data?~~

~~Your personal data shall be processed throughout the period during which payment services are provided, and also afterward, for the following purposes:~~

- ~~• to establish, exercise, or defend claims in connection with the provision of services until such claims become time-barred under the Civil Code, for 3 years from the end of the year in which the Allegro Finance services have been terminated;~~
- ~~• for statistical and archiving purposes, for a maximum of 6 years from the end of the year in which the Allegro Finance services have been terminated;~~
- ~~• to comply with anti-money laundering obligations, for 5 years from the date on which the Allegro Finance services have been terminated or carry out an occasional transaction;~~
- ~~• to perform obligations resulting from applicable laws, including in particular tax or accounting regulations, for a maximum of 5 years from the beginning of the year following the financial year in which the business event requiring the processing of your personal data has taken place;~~
- ~~• until the final conclusion of civil, enforcement, administrative, or criminal proceedings that require the processing of the personal data.~~

~~The processing of your personal data on the basis of your consent will continue until you withdraw it. Where the legal basis for processing is our legitimate interest, your data will be processed until you make an effective objection to their processing.~~



## ~~IX. What are your rights vis-à-vis the Company in respect of data processing?~~

~~You have the right to:~~

~~A. withdraw your consent at any time without affecting the lawfulness of the processing conducted on the basis of your consent before its withdrawal;~~

~~B. access your data;~~

~~C. amend/update or rectify personal data if your data in our possession are inaccurate or incomplete;~~

~~D. restrict the processing of your personal data;~~

~~E. challenge and request the review of a decision taken on the basis of automated processing of personal data;~~

~~F. object in cases when we process your personal data on the basis of our legitimate interest;~~

~~G. erase your personal data if your data is no longer necessary for the purposes for which they were collected, and we have no grounds to process them, e.g., for establishing, exercising, or defending our claims;~~

~~H. lodge a complaint with a supervisory authority if you consider that the processing of your personal data violates the provisions of the GDPR. Your complaint may be lodged with the Prezes Urzędu Ochrony Danych Osobowych (President of the Office for Personal Data Protection), ul. Stawki 2, 00-193 Warszawa.~~

~~You may exercise your rights by sending an appropriate request by mail to the following address: Allegro sp. z o.o., ul. Wierzbicice 1B, 61-569 Poznań, or by email ([iod@allegrofinance.pl](mailto:iod@allegrofinance.pl)).~~

~~We will inform you of the action taken on your request within one month of its receipt. In order to fulfill your request, we are entitled to verify your identity so that your data is not made available to an unauthorized person.~~

## ~~X. Do we engage in automated processing of your data (including profiling) in a way that affects your rights?~~

~~Your personal data may be processed by automated means (including profiling) in order to assess the risk and decide whether to enter into a relationship with you and in order to carry out marketing activities.~~



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

### DEFINITIONS

1. **Personal Data** — within the meaning of the definition contained in Article 4(1) of the GDPR, personal data are understood as information about a natural person identified or identifiable by one or more specific factors determining, e.g., physical, physiological, genetic, mental, economic, cultural, or social identity, including first and last name, contact number, email address
2. **Biometric Data** — within the meaning of the definition contained in Article 4(14) of the GDPR
3. **Policy** — this document
4. **GDPR** — Regulation of the European Parliament and of the Council (EU) 2016/679 of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and the free movement of such data, and repealing Directive 95/46/EC
5. **Anti-Money Laundering Act** — Act of March 1, 2018, on counteracting money laundering and terrorist financing (consolidated text: Journal of Laws of 2022, item 593, as amended)
6. **User** — a person using Allegro Finance services or applying for their use.

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

The controller of personal data of users who are natural persons is Allegro Finance spółka z ograniczoną odpowiedzialnością with its registered office in Poznań, address: ul. Wierzbęcice 1B, 61-569 Poznań (hereinafter: „we,” „Allegro Finance,” or the „Company”). This means that the Company determines the purposes and means of processing your Personal Data.

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 by Allegro Finance can also be found in the Terms & Conditions issued by us or partners we cooperate with.

The Company's activities are subject to the provisions of law applicable to the protection of personal data, in particular the provisions of the GDPR and the Personal Data Protection Act of May 10, 2018. Should you have questions or concerns about the rules and methods the Company protects your Personal Data, write to our Data Protection Officer:

- email address: [iod@allegrofinance.pl](mailto:iod@allegrofinance.pl),
- postal address: Inspektor Ochrony Danych Allegro Finance sp. z o.o., ul. Wierzbęcice 1B, 61-569 Poznań.

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



We can obtain your data from various sources:

- A. Directly from you, using third-party identity verification or identification services;
- B. From third parties we cooperate with (e.g. from Allegro sp. z o.o.), including parties that have obtained consent to the transfer of your Personal Data to us;
- C. From parties associated with you or cooperating with you, including those representing you and providing you with payment instruments operated by us;
- D. From publicly available sources, including, but not limited to, data published by administrative authorities and courts (e.g., business registers, ineffective bailiff executions, bankruptcies, business bans), documents related to the performance of obligations provided for in the Anti-Money Laundering Act, and concerning the application of national and international restrictive measures;
- E. From financial institutions (e.g., banks, payment operators);
- F. From parties involved in payment transactions;
- 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, 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

The scope of Personal Data processed by the Company may vary depending on which services or functionalities provided by the Company you use. We process Personal Data necessary for their proper provision and the protection of legitimate business interests.

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

B. Beneficial owners and persons entitled to represent the User/potential user who is a legal person/imperfect legal person:

- Identification data, e.g., first name(s), last name(s), 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)), images of the identity documents with their data (including image, document series and number, expiration date), image, Biometric Data;
- Contact details, e.g., address of residence, mailing address, contact number, email address;
- Business information contained, i.a., in the Register of Entrepreneurs of the National Court Register (KRS), the Central Registration And Information On Business (CEIDG), the National Register of Insolvent Debtors, or appropriate foreign registers;
- Information related to the device used to access the Company's services, e.g., cookies, IP addresses;
- Other personal data disclosed in the course of using the Company's services (e.g., during the complaints procedure);

C. For persons indicated in sub-paragraphs A and B: Information about inclusion in the sanctions lists, or being a politically exposed person, or being a family member of a politically exposed person, or a person known as a close associate of a politically exposed person within the meaning of the Act on counteracting money laundering and terrorist financing;



## D. Parties involved in the distribution of payment instruments we have issued;

- 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., address of residence, mailing address, address of the principal place of business, contact number, email address;
- Business information, e.g., that contained, i.a., in the Register of Entrepreneurs of the National Court Register (KRS), the Central Registration And Information On Business (CEIDG), the National Register of Insolvent Debtors, or relevant foreign registers;

## E. Parties to the transaction (persons making the payment and beneficiaries of the payment, including those using payment instruments issued 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));
- Transaction data, e.g., the subject matter, course, and procedure of the transaction, bank account numbers, information about payment tools used;
- 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;

## F. Proxies:

- 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 contained in documents confirming the authorization and disclosed in particular by a proxy (e.g., during the complaints 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 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.

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

Depending on the services or functionalities you use, there are different purposes and legal grounds for processing Personal Data by the Company and periods during which the Company may store or use your Personal Data.

For each of the purposes of processing, we have specified the legal basis and the maximum period for the storage of Personal Data. After the indicated period, we will not use your Personal Data for the indicated purpose. However, this does not mean that we will delete them in every case. We will retain your Personal Data for the longest period indicated for specific services of the Company. For example, if you opt out of the Company's services, we will stop processing your Personal Data for the purpose of providing the Company's services. We will store them for the period provided by law, for example to enable the exercise of your rights, and to be able to comply with legal obligations provided for in accounting, tax and anti-money laundering regulations.

Below we have described standard actions on Personal Data in connection with the use of services or functionalities provided by the Company. More detailed information on the processing of Personal Data when using certain services may also be found in the Terms & Conditions of those services.

### 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.

Purpose of Personal Data processing	Legal grounds for Personal Data processing	Period of storage of Personal Data for a specific purpose (retention period)
<b>Taking steps related to the conclusion of an agreement with the User who is a natural person for</b>	Article 6(1)(b) of the GDPR (necessary for entering into and perform an agreement) – Personal Data required for the conclusion	Until the service is discontinued, or until it is found that the service can no longer be provided

electronically provided services and in the scope of payment services	of the agreement	
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	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
Application of financial security measures provided for in the anti-money laundering regulations	Article 6(1)(c) 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
Handling complaints, including solving technical problems	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
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	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
Exercise or defense of legal claims in connection with applying for and not concluding an agreement for Allegro Finance services	Article 6(1)(f) of the GDPR (legitimate interest of the Company in the protection of the Company's rights)	12 months starting from the year following the year in which the agreement was not concluded

<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
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If the financial security measures used in the process of identification and assessment of money laundering and terrorist financing risks require the processing of your Biometric Data, they will be shared on the basis of your consent (Article 9(2)(a) of the GDPR).

Your Biometric Data will be processed only for the purpose of verifying or identifying your identity, in particular the authenticity of your identity card, and will be deleted immediately after the purpose of the processing has been achieved.

## USER SERVICE AND CONTACT FORM

If you contact the Company's service department in the form of outgoing or incoming calls, including by making a phone call to the helpline, the Company may process your Personal Data (e.g., store or analyze them).

The Company may also collect your Personal Data if you contact us through other communication channels provided by the Company, e.g., via the contact form available on the Allegro platform. These Personal Data are necessary to enable us to contact you. In order to prevent violations of the law, including unfair practices, the Company collects data concerning the communication carried out through the above-mentioned form.

In relation to the handling of content addressed to the Company, including through the contact form, we process your Personal Data according to the rules described in the table. Your Personal Data may also be processed for other purposes, including analytical and marketing purposes, and to guarantee the security of our services. Continue reading to learn more.

<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>Contacting Users, including for the purposes of providing services and User service, through the available communication channels, in particular email, telephone,</b>	Article 6(1)(b) of the GDPR (necessary for the performance of an agreement)	Until the service is discontinued

<b>contact form</b>		
<b>Handling Users' requests submitted in particular to the customer service department and via the contact form, when they are not directly related to the performance of the agreement</b>	Article 6(1)(f) GDPR (legitimate interest of the Company in responding to received queries)	Until a response is given or the request is granted
<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

## MARKETING ACTIVITIES

The Company may also use your Personal Data to carry out marketing activities, including where you provide your Personal Data or give your consent to their processing. In return, the Company makes content or services available to you.

<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>Contacting Users for purposes related to permitted marketing activities, through available electronic communication channels, including email, text/MMS, and push, and telephone contact</b>	Article 6(1)(f) of the GDPR in conjunction with Article 10 of the Act on Electronically Supplied Services or Article 172 of the Telecommunications Law (legitimate interest of the Company in the promotion of the Company's or third-party goods or services in connection with expressed consent for a	Until the consent to receive messages or information is withdrawn (based on the provisions of the Act on Electronically Supplied Services or the Telecommunications Law), or until an effective objection to Personal Data processing for marketing purposes is expressed

	communication channel)	
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## ANALYTICAL AND STATISTICAL ACTIVITIES AND SURVEYS

Provisions of the Anti-Money Laundering Act require Allegro Finance to apply financial security measures, which often involve analyzing the activities of Users and their associated parties.

Allegro Finance may also be required by regulatory authorities to provide aggregated or individual reports and analyzes concerning Users and their associated parties.

In addition, your Personal Data may be processed by the Company for analytical and statistical purposes. In this case, we use your Personal Data to improve functionality and quality of services.

Though surveys sent to Users, i.a., via email, the Company may collect Personal Data from Users, which can be used to examine Users' preferences and adjust the Company's offer to their expectations. Such Personal Data are also used for statistical analyses.

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

Purpose of Personal Data processing	Legal grounds for Personal Data processing	Period of storage of Personal Data for a specific purpose (retention period)
Carrying out analyzes provided for in the Anti-Money Laundering Act	Article 6(1)(c) of the GDPR in conjunction with Article 34 of the Anti-Money Laundering Act	Results of the analyzes will be stored for 5 years from the time of their completion, except where the supervisory authority instructs that Personal Data be stored for longer
Preparation and sharing of reports and analyzes provided for in specific regulations	Article 6(1)(c) of the GDPR	In accordance with the regulations on the basis of which the reports and analyzes were prepared
Conducting analytical and statistical activities	Article 6(1)(f) of the GDPR (legitimate interest of the Company in analyzing Users' activity, including activity	Until the end of the storage period of the User's Personal Data in connection with another active purpose of processing, or until an

	history, to optimize the services provided and to increase their quality)	effective objection to Personal Data processing is expressed
<b>Conducting surveys, research, and analyses on the services provided, including in terms of functioning, improving their operation, or estimating the main interests and needs of Users</b>	Article 6(1)(f) of the GDPR (legitimate interest of the Company in analyzing User activity to optimize the services provided)	Personal Data are processed in real time and, therefore, they will be stored until the User no longer uses the services provided by the Company (that is, until the User completes a survey or analysis)

## ENSURING SECURITY OF THE SERVICES PROVIDED AND ENFORCING THE TERMS & CONDITIONS

Where necessary, in order to ensure the security of services, including IT resources or the security of other Users, services, or functionalities, the Company may automatically obtain and record your Personal Data transmitted to the server by web browsers or your devices.

In order to guarantee an adequate security level and prevent abuse and fraud, the Company may obtain and record Personal Data transmitted to the server by web browsers or your devices (which include, in particular: technical components of the device, your browser settings, and details of your viewing behavior on Allegro) in such a way as to create a unique digital “fingerprint” of the devices or instances of applications that you use.

In order to prevent abuse, fraud, and acts that violate the terms of our services, applicable laws (including national or international restrictive measures), or that negatively affects security, we automatically process Personal Data relating to the use of our services and products, including analyzing links with other parties whose personal data we process.

In order to counteract the occurrences listed above, we will make decisions in your case based on automatic data processing, including profiling.

These actions may have an effect of limiting the ability to use the services or functionalities, e.g. automatic suspension/reinstatement of the ability to use our services, their individual functionalities, payouts of collected funds.

<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>Ensuring the security of services or functionalities we provide by electronic means</b>	Article 6(1)(b) of the GDPR (necessary for the performance of an agreement with regard to supporting the security of the Company and Users, and counteracting abuse)	Until the User no longer uses the services
<b>Counteracting misuse, fraud, any activities that violate the terms of the services provided or applicable laws, or behaviors that have a negative impact on the security</b>	Article 6(1)(b) of the GDPR (necessary for the performance of an agreement with regard to supporting the security of the Company and Users, and counteracting abuse)	Until the User no longer uses the services
<b>Compliance with legal obligations to restrict access to services or functionalities on the basis of specific provisions</b>	Article 6(1)(c) of the GDPR (necessary for the compliance with legal obligations under specific legislation)	Until the User no longer uses the services

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

We enable the exercise of all your rights under the GDPR, i.e., the rights described in Articles 15-22 of the GDPR. Below is a detailed description of these specific rights.

The **right of access to Personal Data** allows you to obtain information on the processing of your Personal Data by the Company, including in particular on the purposes and legal grounds for such processing, the scope of the data held, parties to whom your data are disclosed, and the planned date of erasure of these data.

To **obtain a copy of your Personal Data** processed by the Company, you can exercise your right in this respect.

You can exercise your **right to rectify your Personal Data** if you notice that your Personal Data are inaccurate or incomplete. In this case, we undertake to remove the discrepancies or errors in the Personal Data processed and to supplement such Personal Data if they are incomplete.

You can exercise your **right to erasure of your Personal Data** if:





- Your Personal Data are no longer necessary for the purposes for which they were collected or otherwise processed by the Company;
- You withdraw your consent to the processing of Personal Data or object to the processing of your Personal Data, and there are no other legal grounds for their processing;
- Your Personal Data are processed unlawfully.

You can exercise your **right to restrict the processing of Personal Data** if:

- You notice that your Personal Data are inaccurate — you can request the restriction of the processing of your Personal Data for a period allowing us to check the correctness of such data;
- Your Personal Data are being processed unlawfully, but you do not wish them to be erased;
- We no longer need your Personal Data, but you may need them for exercise or defense of legal claims;
- You object to the processing of Personal Data — until it is determined whether the legitimate grounds on our side override the grounds for objection.

You can exercise the **right to Personal Data portability** if the processing of your personal data is based on your consent or a contractual relationship between you and the Company, and if this processing is carried out by automated means.

You can exercise the **right to object to the processing of your Personal Data for marketing purposes** at any time if your Personal Data are processed for marketing purposes, without the need to justify such objection.

You can exercise the **right to withdraw consent to the processing of Personal Data** that you previously expressed at any time; withdrawal of your consent will not affect the lawfulness of the processing that was carried out on the basis of consent before its withdrawal.

You can exercise your **right to human intervention, express your point of view, and contest an automated decision taken against you** at any time if an automated decision has been taken against you that produces legal effects or similarly significantly affects you.

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. Stawki 2, 00-193 Warszawa).

## 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 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

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:

- 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;
- 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.

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).



## Section 8. Contact Details

You can receive more information about the processing of your Personal Data, including answers to questions about the scope of the Privacy Protection Policy, by contacting our Data Protection Officer.

Email address: [iod@allegrofinance.pl](mailto:iod@allegrofinance.pl)

Postal address: Inspektor ochrony danych Allegro Finance sp. z o.o., ul. Wierzbicice 1B, 61-569 Poznań.

You can also contact the Data Protection Officer via the [contact form](#).