

PRIVACY POLICY

1. PREAMBLE

- 1.1. This Privacy Policy (hereinafter - the "Policy") applies to the relationships between FINSTRUMENT Sp. z o. o., a company incorporated under 0000853038 in Poland Registry Court according to the Laws of Poland with an address at ul. TULIPANÓW, nr 7, KONSTANCIN-JEZIORNA, 05-520, POLSKA (hereinafter - the "Operator") and individuals (hereinafter - the "User" or "Users") after the filling them of the feedback form on the Operator's website: <https://fininst.com/> (hereinafter - the "Website").
- 1.2. The Policy applies to the information that the Operator receives about Users during their use of the Website and the acquisition of Operator services.
- 1.3. An exhaustive list of information about Users collected and processed by the Operator is provided in the Article 2 of the Policy (hereinafter - the "User's information").
- 1.4. The current version of the Policy is available on the Website: <https://fininst.com/static/pdf/privacy-policy-en.pdf>.

2. THE USER'S INFORMATION RECEIVED AND PROCESSED BY THE OPERATOR

- 2.1. As a part of this Policy the "User's information" means:
 - 2.1.1. Name, patronymic and surname;
 - 2.1.2. Email address;
 - 2.1.3. Mobile number.
- 2.2. User's information is provided by the User independently during their filling of the feedback form on the Website.
- 2.3. The Policy is only applicable to data collection was carried out during the interaction of the User with the user interface posted on the Website. The Operator does not control and is not responsible for the third-parties websites to which the User can click following links available on the Operator's website. The Operator is not responsible for the information which can be collected or requested or to other actions of the User on the websites of third parties.
- 2.4. The Operator does not check reliability of User's information about the name, patronymic and surname and different information provided by the User. At the same time the Operator assumes that the User provides reliable and sufficient information about himself and keeps this information up to date.

3. THE PURPOSE OF GATHERING AND PROCESSING THE USER'S INFORMATION

- 3.1. The Operator collects and stores the User's information for the following purposes:
 - 3.1.1. providing feedback to the User, including sending notifications, requests and information related to the Website, rendering services, informing about new offers, including via email, as well as request management from the User;
 - 3.1.2. rendering services for the User;
 - 3.1.3. improving the quality of services provided to the User, ease of use, carrying out statistical and other studies based on anonymous data.
- 3.2. In the processing of User's information, the Operator is guided by the laws of Poland. Processing of User's information is based on the following principles:
 - 3.2.1. lawful purposes and methods of processing User's information and integrity of their use;
 - 3.2.2. conformity of the scope and nature of processing User's information and methods of processing of User's information with aims stated in the Policy;
 - 3.2.3. reliability of User's information, their adequacy for the purposes of processing, as well as inadmissibility of processing of User's information redundant in relation to the purposes stated in the Policy;
 - 3.2.4. inadmissibility of combining databases and electronic documents containing User's information created for incompatible with each other purposes;
 - 3.2.5. inadmissibility of processing of User's information which are redundant in relation to the purposes of processing specified in the Policy or incompatible with such purposes.

4. RIGHTS AND OBLIGATIONS OF THE OPERATOR AT THE PROCESSING OF USER'S INFORMATION

- 4.1. The Operator has the right:
 - 4.1.1. provide User's information to the police or different public authorities based on requests in accordance with the law of Poland;
 - 4.1.2. provide impersonal statistical data obtained as a result of the processing of User's information, to a third party for conducting research on behalf of the Operator.
- 4.2. The Operator has not the right:
 - 4.2.1. use User's information for purposes not covered by the Policy;
 - 4.2.2. disclose information containing User's information to a third party without the consent of the User, with the exception of cases stipulated by federal laws and clauses 4.1.1, 5.1 of the Policy.

4.3. The Operator undertakes:

- 4.3.1. ensure the recording, systematization, accumulation, storage, updating (modification), extraction of User's information of citizens of the European Union;
- 4.3.2. ensure the confidentiality of User's information in accordance with the internal policies and rules established by the Operator, taking into account the provisions set forth in clauses 4.1.1, 5.1 of the Policy.

5. PROCEDURE OF PROVIDING USER'S INFORMATION TO THE POLICE

- 5.1. The Operator shall provide User's information based on the motivated request of the judicial authorities and to the police on the basis of writing requests or in the form of electronic documents.
- 5.2. In the provision of User's information in the form of an electronic document the Operator shall send a response to request of the police to the email address of the employee of the police who has made the request.

6. PROTECTION OF USER'S INFORMATION

- 6.1. The Operator takes necessary and sufficient organizational and technical measures to protect User's information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties with them.

7. CHANGE OF PRIVACY POLICY. APPLICABLE LAW

- 7.1. The Operator has the right to make changes to the Policy. When changes are made, the date of the last update shall be indicated in the latest version. The new version of the Policy comes into force from the date of its renewal and placement on the company's website, unless otherwise provided by the new version of the Policy.
- 7.2. Continued use of the Website by the User after any amendments to the Policy means the User's consent to such amendments and / or additions. The User agrees to regularly view the content of the Policy to ensure awareness with its amendments.
- 7.3. To the Policy and to the relations between Users and the Operator arising in connection with the Policy is applicable the law of Poland.