



PRIVACY POLICY

1 IDENTIFICATION OF THE CONTROLLER, THE RANGE OF DATA SUBJECTS AND INTRODUCTORY INFORMATION

- 1.1 Finsteco s.r.o., with registered office at Ružinovská 42, 821 03 Bratislava, ID No.: 55 131 328, registered in the Commercial Register of the District Court Bratislava I, Section: Sro, Insert No.: 166182/B (hereinafter referred to as the "Controller") hereby informs you about the manner of processing of your personal data in accordance with the obligations laid down in Articles 13 and 14 of the GDPR. The words "We", "Our" and all modifications of these words are used in the text of the Document to refer to the Controller.
- 1.2 Data Subjects are, in particular, Consumers, natural persons, entrepreneurs and legal entities who enter into the Finsteco Token Purchase Agreement and the Finsteco Token Referral Agreement (hereinafter referred to as the "Agreement") with the Controller. Data subjects are also other natural persons who have given the Controller consent to the processing of personal data for the relevant purposes or visitors to the website <https://www.finsteco.com> (hereinafter referred to as the "Website") (for further information, please refer to the provisions on cookies). We may use the word "You", "Your" and all modifications of these words to refer to the Data Subject in the text of the Document.
- 1.3 We have created this Privacy Policy (the "Document") for Data Subjects in order to enhance sufficient transparency and to explain the basic rules we follow to protect your privacy and your personal data.
- 1.4 We are particularly concerned about the security and lawfulness of the processing of your personal data and have therefore created specific binding processing rules in this Document, which are based on the basic principles of processing personal data as regulated in Article 5(1) of 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 (General Data Protection Regulation) (hereinafter referred to as the "GDPR").
- 1.5 This Document constitutes the internal privacy policy established by us in accordance with Article 24 of the GDPR for the purpose of demonstrating compliance with the GDPR.
- 1.6 This Document addresses the processing of personal data and our compliance with the fundamental principles of lawful processing of personal data, which are based in particular on the fact that we carry out the necessary processing of personal data in a lawful manner, fairly to all interested parties and transparently to Data Subjects. We continuously place a high value on the security of the processing of personal data, minimizing data and processing operations to the minimum necessary for the proper conclusion and fulfillment of the obligations arising from our mutual Agreement and the use of the Website.
- 1.7 By this Document, we simultaneously provide you with the mandatory information within the meaning of Article 13 of the GDPR and ensure that you are informed of the contents of this Document prior to the collection of personal data, where you provide us with personal data for the first time, or directly when you give your consent to the processing of personal data for the defined purposes.

2 CONTROLLER POLICIES AND WARRANTIES

- 2.1 The subject of the processing of personal data for the purpose of creating a personal account on the Website is the e-mail address and the access password to the account. The legal basis for the processing of personal data is the performance of the Agreement within the meaning of Article 6(1)(b) GDPR. The period of processing of personal data is indefinite until the termination of the Agreement or cancellation of the account. This personal data is necessary for the performance of the Agreement.
- 2.2 If you have opted to purchase Finsteco tokens, the personal data processed is personal data in the following scope: name, surname, address, and telephone number. The legal basis for the processing of personal data is the performance of the Agreement within the meaning of Article 6(1)(b) of the GDPR and the fulfillment of legal obligations within the meaning of Article 6(1)(c) of the GDPR arising from tax and accounting legislation. The period of processing of personal data is set for the duration of the Agreement in the case of processing within the meaning of Article 6(1)(b) of the GDPR and the period of processing of personal data in the case of compliance with legal obligations within the meaning of Article 6(1)(c) of the GDPR is set by law for a period of 10 years following the year in which the accounting event occurred (the invoice arose). This personal data is necessary for the performance of the Agreement.
- 2.3 In connection with the payment of funds for Finsteco tokens, we are also obliged to request personal data necessary for the verification of your person within the meaning of the Anti-Money Laundering and Counter-Terrorism Financing Law. In this context, we require the processing of your personal data as shown on your ID card, to the full extent of the personal data shown on this document. This includes in particular: name, surname, address, date of birth, date of issue and period of validity of the ID card, ID card number, photograph and other personal data relevant to the fulfillment of our legal obligations. The legal basis for the processing of personal data is the fulfillment of legal obligations under the relevant legislation within the meaning of Article 6(1)(c) GDPR. This personal data is necessary for the performance of the Agreement.
- 2.4 The means of processing personal data in the case of the use of the Account and the purchase of Finsteco tokens is in particular the Website. In the case of processing personal data for the purpose of verifying your identity in order to prevent money laundering and terrorist financing, the means of processing may also be an automated identity verification system operated by our processor.
- 2.5 We also process "how you found out about us" information. We process this personal data on the basis of the Joint Controller's legitimate interest within the meaning of Article 6(1)(f), which is the interest in generating statistical information about information flows relating to awareness of our services. Consequently, we process this personal data only in aggregate form, without association with the specific Data Subject who has provided it to us. We subsequently process this statistical data on the basis of Article 89 of the GDPR, for an indefinite period of time.
- 2.6 We do not disclose Personal Data without your consent, nor do we transfer it to any third country that does not provide an adequate level of data protection. We guarantee to process your personal data exclusively within the territory of the member states of the European Union.
- 2.7 The disclosure of personal data may only take place on the basis of your individually expressed consent or your conscious action (e.g. publication of content on our official profile set up on social networks). In this regard, we inform you that the publication of posts, photos, or the performance of any activity that results in your identification on our official profile on a social networking site results in the processing of your personal data in the information systems of that social networking site and on our profile. By acting in accordance with the preceding sentence, you provide your implied consent to the processing of your personal data for our marketing activities.
- 2.8 We regularly review and revise not only the security measures in place to ensure high security of the processing of personal data, but also other procedures and rules designed to protect the privacy and personal data, and we may work with a professional designated as a Data Protection Officer (DPO).
- 2.9 For data transmissions conducted over a publicly accessible computer network between your endpoint device and our server, we use appropriate means of encrypting information (SSL certificate). We also store all data and personal information on designated data storage devices, and these are secured by appropriate means of information encryption protection.

- 2.10 We guarantee that we will not make any consent to the processing of personal data conditional on the conclusion or performance of the Agreement. Your consent to the processing of your personal data, you are free to express without compromising your access to our services. You may withdraw your consent to the processing of your personal data at any time by contacting the Data Controller by sending a written request to the email address support@finsteco.com, whereby the withdrawal of your consent does not affect the lawfulness of the processing of your personal data carried out prior to its withdrawal.
- 2.11 All entities that are legally involved in the processing of personal data other than us are transparently identified within this Document together with their status under the GDPR. We will not carry out any processing operation with your personal data to a third party and/or recipient if it is not transparently identified in this Document and at the same time, we do not have the necessary legal basis to do so under Article 6 of the GDPR.
- 2.12 All recipients of Personal Data access it solely on the basis of the authorization granted by us, while being legally bound by specific obligations and legal safeguards strengthening the protection of the Personal Data of Data Subjects.
- 2.13 We do not provide your personal data to any parties for commercial purposes without your prior individual and free consent. When using Google Analytics, in certain circumstances, the processing of personal data of website visitors may be carried out by Google Inc. as a third party and separate controller, and we have no influence or control over this processing of personal data. We also consider it necessary to inform you that some of the processing of personal data relating to the use of the functionalities integrated into the Website may be carried out separately and completely independently of us by third parties who are in the position of independent controllers distinct from our personal data information systems; in these cases, these are in particular the operators of so-called payment gateways intended for the execution of cashless payments over the Internet. You provide your personal data directly to these third parties without any input or influence from us. This part of the processing of personal data is governed by the internal policies and security measures adopted by these third parties, and we have no influence on such processing of personal data, including the possibility to exercise the rights of the Data Subject, which we inform you about in the context of this Document.
- 2.14 We have carefully vetted our business partners (known as processors) whom we have allowed to process your personal data for their competence and practical ability to ensure the security and lawfulness of the processing of your personal data.
- 2.15 We use the Website to process personal data and communicate with Data Subjects in addition to our normal telephone and email communications.
- 2.16 We also ask you not to necessarily provide any unnecessary data and information of a private nature about yourself in our communications with each other that is not directly related to the Agreement.

3 IDENTIFICATION OF PROCESSORS, RECIPIENTS AND THIRD PARTIES INVOLVED IN THE PROCESSING OF PERSONAL DATA

- 3.1 In processing your personal data, we use the following sufficiently vetted and competent business partners capable of guaranteeing the security of the processing of your personal data, who have the status of processors within the meaning of Article 28 of the GDPR:
- Website provider,
 - the provider of the analysis of user behavior on the Website,
 - an accounting services company.

4 MARKETING

- 4.1 It is in our interest to stay in touch with you so that we can keep you informed about news and offers of our services and information from the world of Cryptocurrencies. For this purpose, we offer you the opportunity to consent to the processing of your personal data for marketing purposes.
- 4.2 If you provide us with your consent, we will process your personal data in the following scope: first name, last name and email address for the entire duration of the consent and until your consent is withdrawn. We will use this personal data to send you relevant information to enable you to take advantage of our offers and services.
- 4.3 Failure to grant any of the consents shall not affect the conclusion of our mutual Agreement as set out in the provisions of this Document.
- 4.4 You may withdraw your consent to the processing of your personal data at any time by sending a written request to support@finsteco.com, and the withdrawal of your consent shall not affect the lawfulness of the processing of your personal data carried out prior to the withdrawal of your consent. Withdrawal of consent is also considered as unsubscribing from marketing information, which is included in each marketing email sent in the form of a separate button or web link.

5 WEBSITE PRIVACY POLICY AND USE OF COOKIES

- 5.1 We also use the website www.finsteco.com (the "Website") when processing some of your personal data.
- 5.2 The Website uses cookies. A cookie is a small text file that the Website stores on your computer or mobile device when you browse it. With this file, the Website retains information about your actions and preferences (such as login name, language, font size and other display settings) for a certain period of time, so that you do not have to enter them again the next time you visit the Website or browse its individual subpages.
- 5.3 We use our own cookies (called first-party cookies) in order to optimize the functions of the Website and to improve the user experience of the Website visitor, as well as foreign cookies (called third-party cookies) for the purpose of displaying so-called behavioral advertising.
- 5.4 The Website also uses so-called short-term cookies, which are automatically deleted from your computer system or other end devices when you stop using your browser. However, in some cases, we may also process so-called long-term cookies, which remain on the end user's device and allow us to recognize that the Website is being revisited by the end user's device, which may be linked, depending on the settings made by the user, e.g. by remembering a pre-set access password, etc.
- 5.5 We hereby inform you and all visitors to the Website that all cookies that the Website may store on the end device of any visitor to the Website can be controlled and deleted. The use of cookies can be effectively and completely prevented by the appropriate settings of the Internet browser. Specific information and instructions on the settings of the different types of internet browsers can be found here: <https://www.aboutcookies.org/how-to-control-cookies/> and the information necessary to delete cookies from the user's technical device can be found here: <https://www.aboutcookies.org/how-to-delete-cookies/>. In general, it can be noted that it is necessary to enable a function in the internet browser that is commonly referred to as "Tracking Protection".
- 5.6 In the event that the internet browser used by your terminal device permits the Website to use cookies to enter and view its content, we are entitled to consider this as an expression of your valid consent to the use of cookies.
- 5.7 We also use a web analytics service from Google Inc. on the Website, but we do not process any personal data or other identifiers usable to indirectly identify (e.g. IP address) Data Subjects. However, this does not mean that personal data is not processed in this way by Google Inc., which is the operator of Google Analytics and Google adWords.

- 5.8 Google Analytics and Google adWords also use cookies to analyze your behavior on the Website, which are stored on the end user's device (computer, tablet, smartphone). Google anonymizes the part of the IP address associated with the device of the end-user of the Website as soon as it is obtained, thereby strengthening the privacy protection of the Data Subject. Google Inc. uses the information collected during your use of the Website to evaluate the use of the Website by users, to issue reports on Website activity and to provide us with other services related to the use of the Website and Internet usage. This data processing by Google Analytics and Google adWords can again be prevented by adjusting the settings of your internet browser to which you install the browser plug-in available via the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.
- 5.9 We may also use Google Analytics and Google adWords on the Website to generate online advertising through remarketing, i.e. the outputs of our marketing communications may also be displayed by different providers of digital services and internet content, including Google Inc, on different websites, which will be displayed on your device in the future after you have finished visiting the Website.
- 5.10 We also use Google Analytics reports to enable us to conduct more effective marketing communications, which may also involve the processing of demographic characteristics and interests relating to Data Subjects (e.g. age, gender, interests) obtained by Google Inc. which we may also use. However, we will not process your personal data when processing data through the use of Google Analytics, as we do not have a sufficient identifier to identify you directly or indirectly.
- 5.11 You can refuse to receive personalized advertising banners from Google by using the following [link](#).
- 5.12 Further information about Google Inc.'s use of data in the context of your use of the Website can be found here: <https://www.google.com/policies/privacy/partners/>.
- 5.13 At the same time, we inform you that if you are logged in to other Internet services from Google Inc. during your visit and use of the Website, your personal data may be processed by Google Inc. We have no influence or influence on this processing of personal data and do not participate in it in any way.
- 5.14 Google Inc. is an independent third-party controller in relation to the use of the Website by Data Subjects. For more information about the current privacy policy adopted by Google Inc., Data Subjects can find it here: <https://www.google.com/policies/privacy/?hl=en>

6 INFORMATION ON THE RIGHTS OF THE DATA SUBJECT

- 6.1 We are committed to preserving the integrity and confidentiality of your personal data and therefore strive to ensure that it is strongly secured, not only through individual, state-of-the-art technical and organizational security measures but also through the ability to exercise the Data Subject's rights at any time by means of a written, handwritten request, which makes clear the identity and the right that the Data Subject is asking the Data Controller to exercise. Requests for the exercise of the right addressed to the Controller may be sent to our electronic address: support@finsteco.com.
- 6.2 We hereby inform you that in cases where the legal basis for the processing of personal data is your consent, you are entitled to withdraw the consent given at any time. You may withdraw your consent to the processing of your personal data at any time by contacting the Data Controller at any of its premises or by sending a written request to the e-mail address support@finsteco.com, whereby the withdrawal of your consent does not affect the lawfulness of the processing of your personal data carried out prior to its withdrawal.
- 6.3 In cases where the legal basis is a contractual relationship, it is necessary to provide us with the requested personal data, otherwise it is not possible to enter into a contractual relationship and provide you with the goods or services in question.
- 6.4 At the same time, you have the right of access to personal data (Article 15 GDPR), the right to rectification (Article 16 GDPR), the right to erasure (Article 17 GDPR), the right to restriction of processing (Article 18 GDPR), the right to data portability (Article 20 GDPR), the right to object to processing (Article 21 GDPR), the right to request a review of an individual decision that would be based on automated processing of personal data (Article 22 GDPR).

- 6.5 Any request for the exercise of a data subject's right under the GDPR may be made by a written and handwritten request sent to our registered office address as it appears in the Commercial Register or to our email address: support@finsteco.com.
- 6.6 We hereby notify you that, when processing your request to exercise the data subject right, we may ask you for a trustworthy verification of your identity, in particular, if you request the exercise of your right by means other than a written letter with a handwritten signature, by e-mail with a trustworthy qualified electronic signature or in person at our registered office (i.e. e.g. in cases of routine e-mail requests or telephone calls).
- 6.7 Each received request for the exercise of a data subject right will be individually and competently assessed, and we will always inform you of the result within 30 days of receipt of the request at the latest. The process of dealing with a request related to the exercise of a data subject right is free of charge. Should we fail to process your request for the exercise of the data subject's right in accordance with the GDPR, you have the option of lodging a complaint with the supervisory authority (www.dataprotection.gov.sk) or seeking a judicial remedy directly with the competent general court.
- 6.8 If you have any questions about privacy and personal data protection or information about the content and exercise of your rights, or for further clarification of the content of this Document, you may contact us at any time via email: support@finsteco.com.

7 FINAL PROVISIONS

- 7.1 If you disagree with or do not sufficiently understand the content or meaning of any part of this Document, we welcome your substantive objections and comments, which we will communicate with you in order to protect and promote your rights and to prevent the creation and aggravation of any risks to your rights and freedoms that may be caused or affected by your use of the Website and/or other processing of personal data in this Document.
- 7.2 We review and update this Document periodically and the most current version of the Document published on the Website will always apply.
- 7.3 You may address your complaint related to the processing of personal data to the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic. Contact details of the supervisory authority:

Office for Personal Data Protection of the Slovak Republic
Hraničná 12
820 07 Bratislava
+421 /2/ 3231 3214
statny.dozor@pdp.gov.sk

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