

PRIVACY POLICY

MEEST TRANSFER SP. Z O.O.

1 Definitions of terms used in the Privacy Policy

USER - an individual, legal entity or organisational unit without the status of a legal entity using an online service via a website or mobile application;

PERSONAL DATA - any information concerning an identified private person or a person who needs to be identified;

COMPANY- ADMINISTRATOR OF USERS' PERSONAL DATA - Meest Transfer Sp. z o.o., based in Ostrowiec Świętokrzyski , at: ul. Siennieńska 11/2.15, 27-400 Ostrowiec Świętokrzyski, registered in the Register of Entrepreneurs under the KRS number 0000326242, NIP PL 9562248359;

SERVICE - services provided electronically through:

- MeestPay mobile application;
- Website www.meestpay.com.

2 General information

1. The Company may receive information about users and the nature of their activities in the following ways:
 - a. through information and data voluntarily provided in the registration form on the Website or in the Mobile Application;
 - b. through cookies stored on the User's devices;
 - c. through the collection of information from server logs.
2. The Company makes every effort to ensure the protection of Users' privacy by applying a policy of minimisation when transferring and processing data about Users, as well as when transferring them to third parties for processing. The Company has implemented and is guided by policies and procedures for the protection of Users' personal data in accordance with the requirements 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 on the abolition of Directive 95/46/EC (General Data Protection Regulation - "GDPR").

3 Registration form and data collection

1. The Company, using the registration form, collects and processes only the information voluntarily provided by the User and his/her personal data.
2. The use of the Website also provides the possibility to collect connection parameters (recording time and IP address).
3. The data collected in the registration form shall be protected by the Company in accordance with the principles of personal data processing set out in paragraph 7 of this Privacy Policy.

4. When providing data on the Website or in the Mobile Application (including user data for logging in and initiating a transfer), protection against theft and interception is provided using SSL encryption with a certificate. The entire process from login to exit from the account is encrypted (there is so-called end-to-end encryption).

4 Server logs

1. Information about user behaviour is recorded in server logs. This data is used to administer the Website and to provide users with the most effective service possible.
2. The resources viewed are identified by the URL. In addition, the following information may be stored:
 - a. the time of the request;
 - b. time of sending the response;
 - c. the name of the client station is identified by the http protocol;
 - d. information about errors that occurred during the execution of the transaction - in case of execution under the http protocol;
 - e. Information about the User's browser;
 - f. Information about the IP address.
3. The data referred to in paragraph 2 above may also be associated and identified with exact Users.

5 Direct marketing, carried out by the Company, including sending and receiving commercial offers.

1. The Company, acting for purposes arising from the legitimate interests of the controller and its business partners as third parties, carries out direct marketing activities in relation to Users, namely sending free e-mails with marketing content (including information messages). In order to send information messages and other direct marketing messages, the Company processes the following personal data of the User: Name, e-mail address, mobile phone number. The email address and mobile phone number are required to send information to the recipient. The first and last name allow for the User's personal address.
2. Messages contain marketing information about the Company's Services and business partners (informing, for example, about promotions, sweepstakes, competitions for Users); and non-commercial messages (informing about changes to the Service, sending greetings or wishes, personal contact with the User, etc.).
3. Non-Users who wish to receive informative messages from the Company may agree to receive such informative messages.
4. Users interested in obtaining information and commercial offers concerning the Company's products or its business partners may request the following consents:
 - a. to consent to the processing of personal data by the Company in order to obtain commercial information about the products and services of the Company or its business partners as defined in Article 6(1)(a) of Regulation (EC) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals 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 - "GDPR"),
 - b. consent to receive commercial information from the Company or its business partners by electronic means (including the use of the provided e-mail address and mobile phone number), as referred to in Article 10 of the Act of 18 July 2002 on the provision of services by electronic means (Journal of Laws 2016, Article 1030, as amended).

- c. Using the MeestPay mobile application (settings menu, Account item), Users may manage their consent to receive commercial information and offers by sending the applications described in sections 5.4.1 and section 5.4.2 in digital format.
- 5. Users interested in obtaining direct marketing from the Company or its business partners using telecommunications equipment, within the meaning of Article 172(1) of the Act of 16 July 2004. - Telecommunications Law (Journal of Laws of 2016, art. 1489 as amended), may give their consent to receive calls and SMS/MMS messages to the mobile phone number provided in the registration form.
- 6. Any consent given by Users to the Company, regardless of the basis on which it was obtained, is always voluntary and the User has the right to withdraw it at any time. The granting, refusal or withdrawal of such consent to marketing shall not affect, restrict or suspend the use of the Company's Services.
- 7. The User may at any time prohibit the processing and use of his/her personal data for direct marketing purposes as defined in Article 21(2) of the General Data Protection Regulation - "GDPR".
- 8. A request to prohibit the processing and use of personal data for direct marketing purposes shall be made in any form, but the Company recommends sending it by e-mail to: iod@meestpay.com
- 9. Notwithstanding marketing activities and sending commercial information, the Company reserves the right to send users messages directly related to the Company's Services and the functioning of its website, as well as highlighting technical information (interruptions or changes in the operation of the Services, new functionalities) and legal and organisational changes (including information on changes in the regulations or organisational changes of the Company).

6 Use of the User's telephone number

- 1. The telephone numbers provided by the Users are used for the proper provision of the services ordered, for checking and confirming orders and for providing the User with information on order completion. In this case, the Company makes both voice calls and sends SMS/MMS messages.
- 2. Irrespective of the use of the telephone number for the proper provision of the ordered services, the User may give appropriate consent to the use of the provided telephone number for direct marketing purposes as defined in paragraph 5(5) of this Privacy Policy.

7 Data processing and data protection principles

- 1. Personal data shall be processed by the Company only for the purposes for which they were collected, shall be subject to adequate protection and shall be communicated to external companies only to the extent permitted by law.
- 2. The administrator of your personal data is the Company.
- 3. In all personal data processing activities, the Company shall ensure that personal data:
 - a. processed lawfully, fairly and transparently for the data subject;
 - b. adequately, appropriately and limited to the amount necessary for the purposes of the processing;
 - c. all data are correct and up to date;
 - d. are kept for a period of time that allows the identification of the person for no longer than is necessary for the purposes of the processing;
 - e. Are processed in accordance with all security measures.
- 4. Personal data shall only be processed by the Company for the following legally permitted purposes:
 - a. for the purpose in accordance with the consent given - subject to prior, separate and voluntary consent, pursuant to Article 6(1)(b) of the General Data Protection Regulation - "RODO");

- b. to provide a service to the User or to fulfil a request at the request of a person interested in the Company's proposal, including answering questions, correspondence and handling complaints, in accordance with Article 6(1)(b) of the General Data Protection Regulation - "GDPR");
 - c. in order to comply with legal obligations laid down by legal standards, for example tax and accounting, in accordance with Article 6(1)(c) of the General Data Protection Regulation - "GDPR");
 - d. for the purposes of pursuing the legitimate interests of the Controller or third parties, the direct marketing of the services of the Controller or its business partners, or the investigation and protection against claims, in accordance with Article 6(1)(f) of the General Data Protection Regulation - "GDPR");
- 5. recipients of personal data may be:
 - a. entities entrusted by the Company with the processing of personal data, e.g. entities providing accounting, legal, IT or marketing services on behalf of the Company, including personalisation services for contacting the User;
 - b. entities and authorities authorised in accordance with the law;
 - c. other organisations such as postal operators;
 - d. entities that cooperate with the Company, such as electronic payment system operators or business partners.
- 6. The Company will retain personal data for the following period:
 - a. in the case of processing based on consent, until the consent is withdrawn, if there are no other grounds for processing;
 - b. in the case of processing for the purpose of providing a service - until the expiry of the time limit for making a claim under the contract;
 - c. in the case of processing on the basis of a legitimate interest of the Controller or third parties - until such interest ceases (e.g. limitation of claims) or until a statutory prohibition of further processing is formulated.
- 7. The Company grants all data subjects the right to:
 - a. Access to their data and to obtain a copy of their data;
 - b. correction of their data;
 - c. erasure of the data, restriction of the processing of the data;
 - d. to object to the processing of the data;
 - e. transfer of data;
 - f. to lodge a complaint with a supervisory authority against the Operator's data processing activities.
- 8. With regard to data processed on the basis of consent, the Company informs you that consent is in any case entirely voluntary and, regardless of the time of submission of such consent, you always have the right to withdraw it. The withdrawal of consent shall not affect the lawfulness of the processing previously carried out.
- 9. The Company informs that the processing of personal data does not provide for automated decision-making, including profiling of Users.
- 10. the Company shall provide direct and continuous access to up-to-date information on the rules and procedures for the processing and protection of personal data. The Company shall inform Users of any changes in this regard. Access to the information takes place by indicating on the pages of the Website

and in the Mobile Application the current version of the Privacy Policy, including the Cookies Policy. In addition, the User may receive information and answers to questions by email at any time, as well as submit any requests and applications for the processing of his/her personal data.

8 Cookie Policy.

1. Cookies are used on the Company's websites.
2. Cookies are IT data, in the form of text files, which are stored on the User's terminal equipment and are intended for use when working with the website. Cookies typically store your preferences regarding website, language, location and time of stay, etc.
3. The Company may collect and receive information from cookies.
4. Cookies are used for the following purposes:
 - a. to create statistics that help to better understand the User's behaviour on the website and to improve the structure and content of the website;
 - b. maintaining the communication session (after logging in), thanks to which the User does not have to re-enter his/her login and password on each sub-page of the Website;
5. The Websites use two main types of cookies: session cookies and persistent cookies. Session cookies are temporary files that are stored on the User's terminal device until you leave the website or switch off your web browser. Persistent cookies are stored on the User's terminal equipment for the time specified in the cookie settings or until they are deleted by the User.
6. Web browsing software (web browser) usually allows cookies to be stored on the User's terminal equipment by default. Users can change the settings themselves. Your web browser allows you to delete cookies. You can also automatically block cookies. Please refer to the directory or documentation of your Internet browser for details.
7. The User must understand that restricting or disabling the use of cookies may affect some of the functions available on the Website Sites.
8. Cookies placed on the User's terminal device may also be used by advertisers and business partners cooperating with the Company.
9. we recommend that you read the privacy policies of these companies to learn about their cookie policies for the collection of statistics: Google Analytics privacy policy.
10. Cookies may be used by advertising networks, including the Google network, to display advertisements that meet the User's requests. For this purpose, information on browsing history or time spent on the website may be stored.
11. All user settings collected by the Google advertising network can be viewed and edited using the following tool: <https://www.google.com/ads/preferences/>.
12. if you do not wish to use cookies, you can change your browser settings. However, we stipulate that disabling cookies necessary for authentication, security, handling of User settings may complicate, and in extreme cases may interfere with, the correct use of the Website.
13. To manage your cookie settings, please read and follow the instructions provided for each web browser.

9 Final provisions

1. The Privacy Policy together with the Cookies Policy shall enter into force on 1 June 2022.
2. The Company reserves the right to amend the Privacy Policy and the Cookies Policy at any time. The consolidated text of the Privacy Policy and the Cookies Policy after amendments will be available on the main pages of the Services under the "Privacy Policy" tab and on the Mobile Application under the "Settings" menu in the "About Us" section.