

MEEST TRANSFER SP. Z O.O. PRIVACY POLICY

At Meest Transfer, we respect your privacy and understand that by sharing your personal information with us, you are placing your trust in us. That is why we want to provide you with the most important information about what happens to the personal data we process. In this Policy, we describe how and when we collect your personal data, what we use it for, to whom we disclose it, how long we store it, and what rights you have in this context.

1. WHO WE ARE AND WHOSE DATA WE PROCESS

Data Controller:

- (1) visitors and users of the MeestPay mobile app and the website www.meestpay.com ("Service"), as well as <http://www.meest-transfer.com> (hereinafter collectively referred to together with the Service as the "Websites");
- (2) of individuals who follow Meest Transfer profiles on social media (LinkedIn) and interact with them;
- (3) people who contact Meest Transfer via email, phone, the contact form, or chat on our websites or other available communication channels;
- (4) job applicants at Meest Transfer;
- (5) our business partners (advisors or consultants, contractors, and service providers for Meest Transfer);

Meest Transfer sp. z o.o., with its registered office in Ostrowiec Świętokrzyski at ul. Siennieńska 11/2.15, 27-400], Ostrowiec Świętokrzyski, entered in the Register of Entrepreneurs of the National Court Register maintained by the District Court in Kielce, 10th Commercial Division of the National Court Register, under KRS number: 0000326242, with Tax Identification Number (NIP): 9562248359, and share capital in the amount of: PLN 5,220,000 (hereinafter referred to as "Meest," "we," "our," "us").

We have appointed **Damian Klimas** as our Data Protection Officer. Please direct any inquiries, requests, or complaints regarding the processing of personal data by Meest to the email addressiod@meestpay.com or in writing to our address: ul. Siennieńska 11/2.15, 27-400 Ostrowiec Świętokrzyski, **with the note "GDPR."**

2. WHEN AND HOW WE COLLECT YOUR DATA

We collect your personal data directly from you when:

- you browse the Websites;
- you follow and interact with our social media channels;
- you contact us via email, phone, the contact form, or chat on our Websites or other available communication channels;
- you respond to Meest job offers;
- you contact us in the context of business cooperation, advisory or consulting services, or the performance and delivery of services on our behalf;

3. PURPOSES AND LEGAL BASIS FOR DATA PROCESSING

We process personal data for the following purposes:

- (1) visitors and users of the Websites:
 - to ensure the proper technical functioning of our Websites (Article 6(1)(f) of the GDPR);

- profiling for the purpose of analyzing statistics on the use of our websites (Article 6(1)(f) of the GDPR).

Providing your personal data is necessary to use our Websites.

(2) Individuals using the payment initiation service (PIS) on the websites of Meest's business partners:

- Initiating a payment order from the customer's payment account at their request or on their behalf (legal basis: performance of a contract or pre-contractual measures – Article 6(1)(b) of the GDPR);
- Anti-money laundering and counter-terrorist financing, including customer identity verification and risk analysis (legal basis: legal obligation – Article 6(1)(c) of the GDPR);
- Identifying Meest to the account provider (bank) to confirm a payment order (legal basis: legitimate interest – Article 6(1)(f) of the GDPR and the provisions of the Payment Services Act);
- Handling complaints regarding the improper performance of payment services (basis: legal obligation);

(3) persons in whose favor payments or money transfers are initiated:

- Initiating a payment order from the customer's payment account at the customer's request or on the customer's behalf (basis: performance of a contract or pre-contractual measures – Article 6(1)(b) of the GDPR);
- Anti-money laundering and counter-terrorist financing, including customer identity verification and risk analysis (legal basis: legal obligation – Article 6(1)(c) of the GDPR);
- Identification of Meest to the bill provider (bank) to confirm a payment order (legal basis: legitimate interest – Article 6(1)(f) of the GDPR and the provisions of the Payment Services Act);
- Handling complaints regarding the improper performance of payment services (basis: legal obligation);

(4) persons who follow Meest's profile on LinkedIn and interact with it:

- providing information about the services we offer and building a positive image of Meest (Article 6(1)(f) of the GDPR);
- responding to inquiries and comments received via social media (Article 6(1)(f) of the GDPR).

Providing your personal data is necessary to follow our social media profiles and to respond to your inquiries and comments via these platforms.

(5) individuals who contact Meest via email, phone, the contact form, or chat on our websites or other available communication channels:

- responding to inquiries received (Article 6(1)(f) of the GDPR).

Providing your personal data is necessary to respond to your inquiries.

(6) Meest job applicants:

- conducting the recruitment process and assessing your skills, competencies, and suitability for the position you are applying for (Article 6(1)(b) of the GDPR and Article 6(1)(a) of the GDPR);

- storing documentation related to your job application for the purposes of future recruitment processes—provided you consent to this (Article 6(1)(a) of the GDPR);
- fulfilling legal obligations arising from the provisions of the Labor Code and other provisions of Polish labor law (Article 6(1)(c) of the GDPR).

To the extent specified in the provisions of the Labor Code (Article 22¹), providing your personal data is necessary to conduct the recruitment process. In all other respects, providing data is voluntary and is not a condition for participating in the recruitment process. If you do not want us to process your personal data beyond the scope specified in the provisions of the Labor Code, simply do not include it in your application.

(7) our business partners (advisors or consultants, contractors, and service providers for Meest):

- contact with employees of our business partners who are legal entities (Article 6(1)(f) of the GDPR);
- contact with our business partners who are sole proprietors (Article 6(1)(b) of the GDPR);
- Defense and enforcement of claims arising from contracts concluded with our business partners (Article 6(1)(f) of the GDPR).

Providing your personal data is necessary to establish and maintain a business relationship with Meest.

In the case of:

1. visitors to and users of the Websites

- we process: IP address, data stored in cookies;

2. Individuals using the payment initiation service (PIS) on the websites of Meest's business partners

- we process: IP address, data stored in cookies, payment account number (IBAN), transaction amount, payment title and currency, series and number of the identity document, PESEL, citizenship, and information on the source of funds (required for higher limits or transfers), the name of the customer's account provider, and transaction identifiers assigned by banks, information on the place of purchase, and the customer's identification number.

3. persons on whose behalf withdrawals or money transfers are initiated:

- we process: payment account number (IBAN), transaction amount, payment title, name of the customer's account provider, and transaction identifiers assigned by banks, information about the place of purchase, and the customer's identification number.

4. people who follow Meest's profile on LinkedIn and interact with it:

- we process: your first and last name or username, other information that is publicly available on your profile or that you voluntarily provide to us;

5. people who contact Meest via email, phone, the contact form, or chat on our Websites or other available communication channels

- we process: first and last name, email address, phone number, or other information you voluntarily provide to us;

6. Meest job applicants

- We process: first and last name, email address, phone number, information about education, qualifications, and previous employment, as well as other information you voluntarily provide to us;

7. our business partners (advisors or consultants, contractors, and service providers for Meest)

- We process: first and last name, tax ID number, email address, phone number;

4. DATA RETENTION PERIOD

Below you will find information on how long we retain the personal data we collect, depending on the entities and categories of data processed:

(1) Visitors and users of the Websites:

- We retain information about your IP address for as long as it is archived in the server logs where our Websites are hosted, i.e., for six months;
- we store information contained in cookies in accordance with the retention periods listed in the table found in the [COOKIES](#) section of the Policy.

(2) Individuals using the payment initiation service (PIS) on the websites of Meest's business partners

- AML/KYC data: Typically retained for a period of 5 years, starting from the end of the calendar year in which the customer relationship ended or the transaction was conducted (as required by anti-money laundering regulations);
- Tax and accounting records: Retained for the period required by tax law (typically 5 years).

(3) persons on whose behalf payments or money transfers are initiated:

- AML/KYC data: Typically retained for a period of 5 years, counting from the end of the calendar year in which the relationship with the customer ended or the transaction was conducted (as required by anti-money laundering regulations);
- tax and accounting records: Retained for the period required by tax law (usually 5 years).

(4) people who follow Meest's profile on LinkedIn and interact with it:

- We retain the data necessary to follow our social media profiles and respond to your inquiries via this medium for as long as you remain a follower of our profile or interact with it; however, your interactions—such as comments or likes—will remain visible even after you stop following our profile, as long as you do not revoke or delete them.

(5) persons who contact Meest via email, phone, the contact form, or chat on our Websites or other available communication channels:

- We retain the data necessary to respond to your inquiries for as long as is necessary to resolve your matter or for as long as required by the statutory limitation periods for claims;
- Additionally, we retain the personal data we need to defend against or pursue claims for as long as required by the statutory limitation periods for claims.

(6) Meest job applicants:

- If you do not consent to the processing of your personal data contained in recruitment documents for future recruitment purposes, we will delete this data immediately after the recruitment process for the position you are applying for has been completed;
- If you consent to the processing of your personal data contained in recruitment documents for the purposes of future recruitment, we will retain this data until you withdraw your consent, but no longer than 2 years after the recruitment process ends.

(7) our business partners (advisors or consultants, contractors, and service providers for Meest)

- We retain personal data obtained through contact with employees of our business partners that are legal entities and through contact with our business partners operating as sole proprietorships for as long as required by tax laws;
- Additionally, we retain the data necessary for us to defend against or pursue claims arising from contracts concluded with our business partners for as long as required by the statutory limitation periods for claims.

5. TO WHOM WE MAY DISCLOSE YOUR PERSONAL DATA

Below is a list of entities to whom we may disclose your personal data:

(1) visitors to and users of the Websites:

- IT service and system providers, including analytics services and tools that we use to operate our Websites and analyze usage statistics;
- legal advisors and consultants serving Meest to the extent that disclosure of data is necessary to use their services;

(2) individuals using the payment initiation service (PIS) on the websites of Meest's business partners

- IT service and system providers,
- legal advisors and consultants serving Meest to the extent that disclosure of data is necessary to use their services;
- account providers (e.g., banks): to the extent necessary to initiate a transaction from your payment account;
- business partners: for the purpose of confirming the submission of a payment order, the transaction amount, and information enabling the identification of the payment;
- supervisory and government authorities: including the Polish Financial Supervision Authority (KNF) and the General Inspector of Financial Information (GIIF), in connection with the fulfillment of legal obligations incumbent upon the payment institution;
- identity verification service providers: for the purpose of automatically verifying identity and documents as part of KYC processes.

(3) persons on whose behalf withdrawals or money transfers are initiated:

- AML/KYC data: Typically retained for a period of 5 years, counting from the end of the calendar year in which the customer relationship ended or the transaction was conducted (as required by anti-money laundering regulations);
- tax and accounting records: Retained for the period required by tax law (typically 5 years).

(4) people who follow Meest's profile on LinkedIn and interact with it:

- social media operators;
- entities we engage to manage our social media profiles;
- providers of IT services and systems that we use to manage our profiles on LinkedIn
- legal advisors and consultants serving Meest to the extent that the disclosure of data is necessary to use their services;

- (5) individuals who contact Meest via email, phone, the contact form, or chat on our Websites or other available communication channels;
- email service providers;
 - postal operators and couriers;
 - providers of IT services and systems that we use to operate email and our Websites;
 - legal advisors and consultants serving Meest to the extent that disclosure of data is necessary to use their services;
- (6) Meest job applicants;
- providers of IT services and systems that we use to manage recruitment processes;
 - legal advisors and consultants serving Meest, to the extent that the disclosure of data is necessary for the provision of their services;
- (7) our business partners (advisors or consultants, contractors, and service providers for Meest);
- entities providing accounting and bookkeeping services to Meest;
 - providers of IT services and systems that we use for management within Meest's organizational structure;
 - legal advisors and consultants serving Meest to the extent that disclosure of data is necessary to use their services;

Since we use the services of Microsoft Ireland Operations Limited (Office 365) and OVHcloud (hosting), your personal data may be transferred by these entities outside the European Economic Area on the basis of standard contractual clauses (Article 46(2)(c) of the GDPR). We also work with [Checkin.com](#), which is a recipient of your personal data. The purpose of this data sharing is to identify users and/or verify their identity documents.

Any questions regarding the transfer of data outside the EEA should be directed to these entities directly.

For more information, please visit:

- [Microsoft Privacy Statement](#)
- [OVHcloud Personal Data Use Policy](#)

6. YOUR RIGHTS

In connection with our processing of your personal data, you have the following rights:

- **Request access to your personal data and have it corrected**

You have the right to access information about yourself at any time and to have it corrected if it is inaccurate.

- **deletion of personal data , which we hold about you and the right to restrict its processing**

At your request, we will delete the data collected about you once the purpose for which the data was collected has been fulfilled. You have the right to request that we delete the data about you or restrict its processing at any time.

- **right to data portability**

To the extent that your personal data is processed by automated means for the purpose of performing a contract (Article 6(1)(b) of the GDPR) or based on your consent (Article 6(1)(a) of the GDPR, Article 9(2)(a) of the GDPR), you have the right to receive from us your personal data

in a structured, commonly used, machine-readable format, and you have the right to transmit that personal data to another controller without hindrance from us.

- **Right to object to data processing**

To the extent that personal data is processed to pursue Meest's legitimate interests (Article 6(1)(f) of the GDPR), you have the right to object to the processing of your personal data.

- **Right to lodge a complaint with a supervisory authority**

If you believe that our processing of your personal data violates applicable data protection laws, you have the right to lodge a complaint with the supervisory authority, i.e., the President of the Personal Data Protection Office in Warsaw.

- **Right to withdraw consent to the processing of personal data**

If we process personal data based on your consent, you have the right to withdraw your consent at any time, which does not affect the lawfulness of the processing carried out based on that consent prior to its withdrawal.

If you wish to exercise your rights, please contact us by email at the Data Protection Officer's address: iod@meestpay.com , or in writing at our address: ul. Siennieńska 11/2.15, 27-400 Ostrowiec Świętokrzyski, **with the note "GDPR"**.

7. AUTOMATED DECISION-MAKING

To ensure the security of the services provided, protect your funds, and fulfill legal obligations (arising from anti-money laundering and counter-terrorism financing regulations), your personal data may be subject to automated decision-making, including profiling.

We use automated systems to monitor and analyze transactions in real time. Decisions made in this way are based on the analysis of behavioral patterns, transaction data, and technical information (e.g., IP address, device data), which allows us to detect unusual or potentially fraudulent activities.

The result of automated analysis may be a temporary suspension of a transaction, a refusal to initiate a payment, or a temporary restriction of access to services if the system identifies a high risk of abuse or an attempted crime.

If a decision is made through fully automated processing, you have the right to:

- receive an explanation of the basis for the decision;
- request human intervention from one of our employees;
- present your own position and challenge that decision.

8. ANALYTICS AND MARKETING TOOLS

We and our business partners use various solutions and tools for analytical and marketing purposes.

9. SOCIAL MEDIA

We process the personal data of users who follow Meest's profile on LinkedIn and interact with it. Detailed information about LinkedIn's data processing can be found at the link below:

- [LinkedIn Privacy Policy](#)

10. COOKIES

We use cookies and similar technologies (such as pixel tags) **on** our websites.

Cookies are small packets of information stored on end devices, typically containing the website address, the date of placement, the expiration date, a unique number, and additional information consistent with the purpose of the cookie.

The cookies we use:

Name	Type	Storage duration
wpEmojiSettingsSupports	Essential	Session
pll_language	Functional	1 year
_dc_gtm_UA-*	Functional	1 minute
ga*	Analytics	1 year, 1 month, 4 days
_ga	Analytics	1 year, 1 month, 4 days
_gid	Analytics	1 day
_gat_UA-*	Analytics	1 minute
_fbp	Analytical	3 months
lastExternalReferrerTime	Other	never
lastExternalReferrer	Other	never

You can disable cookies directly on the device you use to connect to our websites, following the browser manufacturer's instructions:

- [Google Chrome](#)
- [Safari](#)
- [Mozilla Firefox](#)

For information on how to configure and delete cookies in other web browsers, please visit the websites of their respective manufacturers.

11. CHANGES TO THE PRIVACY POLICY

The provisions of the Meest Transfer sp. z o.o. Privacy Policy may be subject to improvements and changes, and the latest versions will be published on our websites and marked with the date of the last update.

This Policy is effective from April 16, , 2026.