



PRIVACY POLICY

Definitions

The following terms should be understood as defined below:

- a) **Guest** – a person who remains on the Administrator's Website using a web browser.
- b) **Client** – refers to the Service Recipient, Guest, Interested Person
- c) **Interested Person** – a natural person making an inquiry to the Administrator, a natural person acting on their own behalf or a natural person who is a member of the management board or another person authorized to represent acting on behalf of a legal entity, to carry out Verification and create an account on the Website.
- d) **Service Recipient** – a natural person who, on their own behalf and account or a member of the management board or another person authorized to represent a legal entity, partner or actual beneficiary of a legal entity, has carried out Verification on the Website and has been successfully assessed in this Verification process and has started using the Administrator's services.
- e) **Verification** – a process consisting of factual activities, partially automated, conducted by the Administrator and cooperating entities, aimed at determining and checking the correctness and truthfulness of the Interested Person's data, in order to assign the Interested Person the status of Service Recipient.
- f) **Website** – the Administrator's website operated on the Internet at <https://amiston.pl>.

Who controls your personal data?

In accordance with Article 13(1) and (2) of the 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 (GDPR), we inform you that the Administrator of the client's personal data is **AMISTON SP. Z O.O.** with its registered office in Opole at ul. Oleska 6, 45-052 Opole, registered in the register of entrepreneurs of the Ministry of Justice of the Republic of Poland under number 0000561765, with a share capital of PLN 300.000, email address: biuro@amiston.pl, phone: +48 531 178 926 ("Administrator").

To whom do we transfer your personal data?

The client's personal data may be made available to employees or collaborators of the Administrator authorized to process them at the Administrator's request, as well as to entities to whom the Administrator entrusts the processing of personal data, including accounting, IT, marketing, and organizational entities enabling the Administrator to provide services, conduct its activities, prepare and distribute marketing materials ("**Cooperating Entities**"). In particular, personal data is entrusted to entities providing Verification services within the Know Your Customer process in accordance with the AML policy applicable in the Administrator's Company and due to obligations introduced by the Act on Counteracting Money Laundering and Financing of Terrorism. Your data may be transferred to competent authorities (Police, Prosecutor's Office,



Courts) in accordance with the jurisdiction of the proceedings conducted in the scope of performing their statutory tasks, upon their request submitted in compliance with the appropriate procedure, ensuring all guarantees ensuring the security of the transferred data.

Your personal data may be transferred to entities within the Administrator's group – that is, entities with capital and personal ties to the Administrator – particularly to the extent necessary for the Administrator to provide services covered by agreements concluded with the Client. The Administrator exercises due diligence in selecting and choosing Cooperating Entities, and then, at the stage of concluding agreements with them, ensures that these entities provide an adequate level of security concerning the processing of personal data.

Where do we store your personal data?

We store the collected personal data within the European Economic Area ("EEA"), but they may also be transferred to and processed in a country outside this area. Each data transfer operation is carried out in accordance with applicable law, the internal procedures of the Administrator's Company, and this Privacy Policy.

If data is transferred outside the EEA, including if, at the Client's request, goods or services are to be delivered outside the EEA, the Administrator uses all available technical measures concerning countries for which the European Commission has not determined an adequate level of data protection and processes the Client's data only based on their voluntary consent.

Administrator's guarantees and declarations

The Administrator guarantees the protection of personal data and the processing of personal data in accordance with GDPR. The Administrator collects only the data necessary to perform the contract. The Administrator does not process data beyond the scope necessary to perform the contract for the provision of electronic services or the legal obligation incumbent on the Administrator without the prior consent of the Client.

The Administrator takes particular care to protect the interests of the persons whose data is processed, and in particular ensures that the data collected is processed in accordance with the law; collected for specified, lawful purposes and not subjected to further processing incompatible with these purposes; substantively correct and adequate in relation to the purposes for which they are processed and stored in a form that allows the identification of the persons they concern, no longer than necessary to achieve the purpose of processing.

Due to the nature of the Administrator's services, the Administrator does not process any data of natural persons who are under 18 years of age, or who do not have full legal capacity due to a relevant ruling on total incapacitation, or who should act through a legal representative due to partial incapacitation.

On what basis does the Administrator process your personal data?

The processing of personal data is carried out for the following purposes and based on the following legal grounds:

1. To the extent that the processing will be carried out in connection with the Administrator's activities and the provision of services to the Client, i.e., in the scope of receiving and archiving the Client's declarations of will in connection with activities on the website <https://amiston.pl>, as well as for the



performance of contracts to which the Client is a party or taking actions at the Client's request before concluding a contract, to consider any complaints – Article 6(1)(b) GDPR;

2. In the scope of keeping accounting records and settlements related to the performance of the concluded contract, the Administrator processes personal data in connection with obligations imposed by legal regulations, including the Act on Value Added Tax in the scope of issuing fiscal receipts and VAT invoices by the Administrator – Article 6(1)(c) GDPR;
3. To consider any complaints or claims submitted, in the scope of pursuing claims related to the conducted business activity, for archival (evidential) purposes being the realization of our legitimate interest in securing information in case of the legal need to prove facts before competent state authorities, for analytical purposes [optimizing our products based also on the Client's comments about them and the Client's interest, optimizing service processes based on the course of Client service processes] – in our opinion, processing these data is also beneficial for the user, as it improves their experience and allows us to offer better quality services – Article 6(1)(f) GDPR;
4. After expressing separate consent based on Article 6(1)(a) GDPR, to offer our products and services directly (direct marketing), including tailoring them to the Client's needs, sending marketing materials in communication channels provided by the Client (including SMS/MMS messages sent to the phone number provided by the Client) – only if you give your consent.

Purpose	Legal Basis
<p>Conducting Verification, including automated and manual Client Verification; point (1), subpoint 1 of the Privacy Policy, and additionally Article 22(2)(a) and (b) of the GDPR.</p>	<p>The processing of your data is necessary and results from legal obligations imposed on the Administrator by various legal acts – the Act of March 1, 2018, on Counteracting Money Laundering and Financing of Terrorism, as well as the Directive (EU) 2018/843 of the European Parliament and of the Council of May 30, 2018, amending Directive (EU) 2015/849 on the prevention of the use of the financial system for money laundering or terrorist financing and amending Directives 2009/138/EC and 2013/36/EU, Directive (EU) 2015/849 of the European Parliament and of the Council of May 20, 2015, on the prevention of the use of the financial system for money laundering or terrorist financing, amending Regulation (EU) No 648/2012 and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC (Text with EEA relevance).</p> <p>The above-mentioned legal acts require the Administrator to carry out Client Verification – this Verification includes, in particular, establishing identity, properly confirming it, determining the Client's residential address, and identifying the sources from which the Client finances their activities on the Administrator's Website.</p>



	<p>Automated Verification is necessary to enable the Client to use the services. Without conducting automated Verification, it would be impossible for the Administrator to provide services. The Administrator has the technical capability to verify the decision made in an automated manner and influence the content of this decision at any stage of its making.</p>
<p>Performance of the contract, provision of services to the Client, and the consequences of the concluded contract or provided services – as referred to in point (1), subpoints 1, 2, and 3 of the Privacy Policy."</p>	<p>The processing of your data is necessary and results from legal obligations imposed on the Controller by various legal acts – the Act of 1 March 2018 on Counteracting Money Laundering and Terrorist Financing, as well as Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 amending Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, and amending Directives 2009/138/EC and 2013/36/EU; Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC (Text with EEA relevance).</p> <p>The above-mentioned legal acts require the Controller to perform Client Verification – this Verification includes, in particular, establishing and properly confirming the Client's identity, determining the Client's residential address, and identifying the sources from which the Client finances their activity on the Controller's Website.</p> <p>Automated Verification is essential to enable the Client to use the services. Without such automated Verification, the Controller would not be able to provide services. The Controller has the technical capability to review decisions made in an automated manner and to influence the content of such decisions at every stage of their adoption.</p>
<p>Customer Support, Product and Service Improvement, Quality Analysis – point (1), subpoint 3 of the Privacy Policy; Cookie Policy.</p>	<p>The Controller has a legitimate interest in handling requests and inquiries submitted by Clients through various available means of contact. In the Controller's view, the processing of</p>



	<p>such data benefits the Client, as it allows for appropriate support and responses to questions raised by the Client. If a Client's inquiry concerns the exercise of rights described below, or a complaint regarding our services, the legal basis for processing the Client's data is the necessity for the Controller to fulfill its legal obligations.</p> <p>The Controller also has a legitimate interest in conducting usability research on communication channels and assessing Client satisfaction. In the Controller's opinion, the processing of such data is likewise beneficial to the Client, as it enables an improved user experience and the provision of higher-quality services.</p> <p>Furthermore, in accordance with the Cookie Policy, in order to offer the Client the highest possible quality of electronic services tailored to their individual technical preferences and to continuously improve the services provided on the website https://amiston.pl, we collect cookies in categories 1 and 2 based on the Client's activity on the Website. The processing of cookies is carried out automatically, and to the extent not covered by the Client's explicit consent, it is necessary for the enhancement of the https://amiston.pl website and for ensuring the Client's technical ability to navigate the website.</p>
<p>Marketing – point (1), subpoint 4 of the Privacy Policy; Cookie Policy. All marketing activities are carried out by the Controller based on your explicit consent, with a clearly defined purpose for data processing.</p>	<p>The legal basis for processing the Client's data for marketing purposes is solely their explicit consent, expressed, for example, at the moment of accepting to receive information tailored to their individual preferences via various means, or when accepting the legal terms for participation in a specific promotional campaign, or when accepting the Cookie settings collected by the Website.</p> <p>The Controller's activities in this regard aim to present the Client with an offer from the Controller's service catalogue that best matches the Client's preferences.</p>

The Controller ensures that providing any data is voluntary, but except for the purposes of receiving marketing offers and materials or direct marketing (processing basis specified in point (1) subpoint 4), providing data is necessary for the conclusion and performance of the service agreement and its delivery. Failure to provide personal data or a request to delete or restrict the processing of personal data will result in the inability to provide services within the aforementioned scope.



Provision of Personal Data and Consequences of Non-Provision

The Controller ensures that providing any personal data is voluntary. However, except for the purposes of receiving marketing offers and materials or direct marketing (as specified in point (1) subpoint 4 of the Privacy Policy), providing data is necessary for the conclusion and performance of the service agreement. Failure to provide personal data, or a request to delete or restrict the processing of personal data, will result in the inability to provide services within the aforementioned scope.

How Long Does the Controller Store Your Personal Data?

(“Retention Periods”)

The Controller stores personal data for the following durations:

1. **Website Visitors** – Personal data of visitors are processed as long as the visitor remains on the website <https://amiston.pl>. If the visitor consents to the processing of cookies for marketing purposes, the data will be processed until consent is withdrawn.
2. **Interested Parties** – Personal data will be processed until a response is provided to the inquiry submitted by the interested party or until the verification process is completed:
 - (a) If **verification is positive**, the data will be processed in accordance with the retention period for Clients.
 - (b) If **verification is negative**, personal data will no longer be processed.
3. **Clients** – Personal data will be processed until the expiration of the legal obligation under the Act on Counteracting Money Laundering and Financing of Terrorism, i.e., for **5 years** from the end of the last business relationship with the Client, in accordance with § 47 of the said Act.

What Are Your Rights?

The Controller stores personal data on secured servers. Access is granted only to selected employees and associates indicated above. The storage location and method are designed to ensure full data security. Client rights related to the processing of personal data include:

- a. the right to withdraw consent for data processing,
- b. the right to access personal data and receive a copy,
- c. the right to request rectification (correction) of personal data,
- d. the right to request erasure of personal data,
- e. the right to request restriction of data processing,
- f. the right to object to data processing based on a specific situation justifying cessation of such processing,
- g. the right to data portability, i.e., to receive personal data in a structured, commonly used, machine-readable format. This applies only to data processed based on a contract or consent.



To exercise any of the above rights, the Client should contact the Controller. To ensure the request comes from an authorized person, the Controller may ask for additional information to verify and authenticate the identity of the requester.

If data is processed based on consent, it may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal. Consent may be withdrawn by sending a withdrawal statement to the mailing or email address of the Controller.

Cookie Policy

1. We use technology that stores and accesses information on the user's computer or other end device connected to the Internet. We use Cookies — small text files related to the use of <https://amiston.pl> — which are stored in the browser and contain information about user activity on the site. Local storage space in the browser is used for the same purposes and is covered by this policy. We collect cookies in three categories, described in detail below.
2. To better understand our Clients' needs, we analyze anonymized data about usage of the website <https://amiston.pl>. For this purpose, we use **Google Analytics**, a web analytics tool that helps us improve site functionality. Google Analytics collects anonymous data and identifies usage trends without identifying individual users. It uses its own cookies to gather information like visit times, referral sources, screen resolution, services viewed, etc.

We also use tools such as:

- **HotJar** – for heatmaps and scroll maps (indicating how far users scroll),
 - **Leadfeeder** – to monitor site visitors,
 - **YouTube, Instagram, and Facebook integrations** – allowing us to show Facebook ads to visitors who have already accessed our website.
3. By default, web browsers allow the storage and access to cookies. Users of <https://amiston.pl> may modify browser settings to disable cookie storage or permanently delete cookies. Cookie usage is managed through your browser settings.
 4. By using the Controller's website without disabling cookies in your browser settings, you consent to the storage of cookies and access to your end device. Users may change these settings at any time. This applies to **Category 1 and 2 Cookies**.
 5. The collection and processing of **Category 3 Cookies** is based on the Client's **prior consent** for data processing for marketing purposes. This consent is **voluntary** and can be withdrawn at any time. Withdrawal does not affect the lawfulness of processing carried out before it.
 6. Limiting the use of cookies may negatively impact the usability and performance of the website for Clients. The Controller does not guarantee full functionality or proper operation of the website if **Category 1 and 2 Cookies** are not accepted.



7. Cookies do **not** contain personal data such as usernames, passwords, or credit card details. They consist only of data automatically received by the website.
8. The Administrator is not responsible for the content or accuracy of third-party websites.
9. The Administrator collects Cookies in three categories:

Category	Name	Basis of Processing	Management	Purpose of Processing
First Category Withdrawal of consent for their processing will result in the inability to ensure the operation of the Administrator's Website.	Functional Cookies	Necessity of processing for the performance of a contract or to take action at the request of the Client – Article 6(1)(b) of the GDPR.	Website Administrator	They are necessary for the Administrator's Website to function properly. They are used to maintain the Client's session while visiting the site and logging into the Account. They ensure the proper display of the Website, adjust services from a technical standpoint to the Client's choices. They are used to identify the user's HTTP session. They are common in all web applications to identify user requests during a session. They allow the identification of the user's navigation status on the site.
Second Category	Statistical Cookies	Legitimate interest of the Administrator – Article 6(1)(f) of the GDPR.	Google Analytics – Third Party Entity Administrator – in the remaining scope	The Administrator measures traffic on the site, examines the effectiveness of actions, and improves the functioning of the website. It also prevents undesirable actions (e.g., bot traffic, threats to users from unwanted content). Regarding Google Analytics - it enables site monitoring using the Google Analytics tool, which is a service provided by Google Inc. based in the



				<p>United States of America, thus outside the EEA. It is used to obtain information about user access to the website, e.g., to determine the number of visits to the site by the Client, the date of the first and last visit, the duration of visits, the search engine used by the Client to access the site, or the link used to redirect to the site. The Administrator has no influence on the content and technical aspects of these files, as they are determined and stored by Google Inc. Therefore, the Administrator recommends reviewing the Google Analytics privacy page: Google Analytics Cookie Usage.</p>
Third Category	Marketing Cookies	Consent given by the User – Article 6(1)(a) of the GDPR.	Administrator and Third Parties	<p>The Administrator uses them to personalize advertisements displayed on the website and on external websites, taking into account the actions and preferences of the Client on the Website, and to tailor the content of advertising messages to the preferences of Clients.</p>

You have the right to lodge a complaint with the lead supervisory authority in accordance with Article 56 of the GDPR, which is the President of the Personal Data Protection Office, or, in the case of processing significantly affecting individuals in another Member State, the supervisory authority competent for that Member State, if you believe that the processing of your personal data violates the provisions of the GDPR.