

Privacy Policy of Autopay Global Ltd

Privacy Policy is the place where you will find out who is the controller of your personal data, for what purpose, to what extent and for how long it will be processed. In addition, you will find out to whom and on what terms we can share your data, as well as what rights you have in connection with its processing.

We have created this Privacy Policy so that you will find all the necessary information required by 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 in force since May 25, 2018. ("RODO").

Whenever we refer to data below, we mean the personal information you give us or we obtain from other sources about you, such as your name, email address or phone number.

<p>Who is The controller of my personal data?</p>	<p>The data controller of the personal data is Autopay Global sp. z o. o. with registered office in Warsaw, Złota 3/18, 00-019 Warsaw, registered in the Register of Entrepreneurs of the National Court Register under the number 0000971035, whose registration documentation is kept in the District Court of the Capital City of Warsaw in Warsaw, XII Economic Department of the National Court Register, NIP 5252907713, with the share capital of PLN 5,000, having the status of a large entrepreneur within the meaning of the Act on Counteracting Excessive Delays in Commercial Transactions.</p>
<p>How can I contact you about personal information issues?</p>	<p>The processing of our customers' personal data is supervised by a Data Protection Officer appointed by us. You can contact him by e-mail at dpo.global@autopay.eu or in writing to: Autopay Global sp. z o. o. Złota 3/18, 00-019 Warsaw, mark: personal data protection</p>
<p>In what situations do you process my personal data?</p>	<p>We process your personal data whenever you use our services, for example, when use our advertising or technical solutions to support payment transactions, when you represent your organization in signing a contract, when you act as a contact person, or when you use our analytical services. Whenever you come to us with your issue or complaint we also process your personal data. We also process your personal data when we send you marketing information about us or our business partners, and when you consent to our processing of your phone number or email address. We also sometimes process your personal data when we are asked to do so by other controllers of your data who provide services to you, such as a payment service provider or lending institutions</p>

Do I have to give you my data?	Your submission of data is voluntary, but some of your data may be necessary to enter into a contract and properly provide our services, or to meet the requirements set forth by law that we must comply with
What kind of data do you process?	<p>We process both data that you have provided to us yourself, as well as data that we have developed ourselves (e.g., using cookies or other tools that we use), or that has been made available to us (e.g. through our website during registration process and its use) or entrusted to us by other data controllers, such as your payment service provider in the form of Autopay S.A., other payment service providers, or your bank, lending institutions or the recipient of your payment. We also process data provided to us by the device you use when using our services (device fingerprint, cookies), as well as data that we process with your explicit consent (e.g. biometric data). We take care to process only the data that is necessary for the purpose for which we collect it (data minimization).</p> <p>For example:</p> <ol style="list-style-type: none"> 1. If you represent your organization when signing a contract, or act as a designated contact person, we process your name, official position, phone number, email address, among others. 2. If you give us your consent, we process for analytical and profiling purposes data related to your consent, among others, data on payments made
For what purpose do you process my data?	<p>We process your data primarily for the purpose necessary to enter into and perform a contract, including handling complaints or to take action at your request before entering into a contract. If necessary, we may, on our own initiative, contact you about technical matters, e.g. when you have a problem with the launch of a service or when we want to know your opinion about our services.</p> <p>The processing of some of your data is also necessary in order for us to fulfil our obligations under the law, such as the obligation to store certain data for a certain period of time, to collect certain information for the purpose of verification and identification of the user, or to transfer data to authorized authorities or entities, such as those arising from tax laws, the Accounting Act, or the Electronic Communications Law</p> <p>We also process your data for other legitimate purposes, including</p> <ol style="list-style-type: none"> 1. monitoring your activity on our services (among other things, using cookies and the tools we use), 2. profiling your interests and needs (also using cookies) to target only those services that may be of interest to you, 3. direct marketing of our products or services - so we can inform you about our offerings,

	<ol style="list-style-type: none"> 4. to know your opinion about the services we provide, 5. the establishment, investigation and defence by us of possible claims arising out of our operations, 6. monitoring, deterring and detecting possible fraud or abuse committed through the services we provide, 7. assessing the risks associated with our provision of certain services, 8. the ability to perform contracts with contractors and the ability to contact them in connection with their performance. <p>If you have given us permission, we may send you our newsletter or contact you about new offers by phone, email or messages to your cell phone and other communicators (e.g. Whatsapp, Telegram, etc.). When you use an advertisement prepared by us, we process your data in order to display a tailored offer and evaluate the effectiveness of the advertisement. Based on your consent, we process your data related to your transaction history and payment method for analytical purposes and to tailor offers and services.</p> <p>If you are interested in our Partners' commercial offers and have agreed to receive them, we may send you commercial messages on their behalf or share your information with them so that they can send you the information themselves.</p> <p>We may also process your data to perform tasks related to handling internal requests.</p> <p>If we decide to process your data for a different purpose than we collected it for, we will inform you and ask for your consent, if required by law.</p>
<p>On what legal basis do you process my data?</p>	<p>The legal basis for data processing is:</p> <ol style="list-style-type: none"> 1. conclusion and execution of a contract or 2. consent you have given, or 3. realization of the legitimate interests of the data controller or 4. our fulfillment of our obligations under applicable laws and regulations, depending on the type of service we provide, these include: <ol style="list-style-type: none"> 1. Law of 29.09.1994 on accounting, 2. Law of 11.03.2004 on tax on goods and services,

	<ol style="list-style-type: none"> 3. Law of 29.08.1997 Banking Law, 4. Law of 18.07.2002 on the provision of electronic services, 5. Law of 12.07.2024 Law of electronic communication 6. Law of 05.08.2015 on the handling of complaints by financial market entities and the financial ombudsman, 7. Law of 23.09.2016 on out-of-court settlement of consumer disputes 8. Law of 10.05.2018 on the protection of personal data, <p>We process your data in accordance with applicable data protection laws, including the RODO.</p>
Why are you emailing me?	<p>You will receive emails from us in the following cases:</p> <ol style="list-style-type: none"> 1. You have sent a message to our email address and are expecting a response from us, 2. you are a user of our service and we contact you on matters related to the conclusion or execution of the contract, 3. We contact you to resolve the complaint, 4. We contact you on behalf of our Partner, 5. you have agreed to receive commercial information about us or our Partners, 6. The law requires us to provide you with certain information; depending on the type of service provided, these include: <ol style="list-style-type: none"> a) information provided under the Consumer Rights Act. <p>If you believe that you are not the intended recipient of a message you have received, please let us know via dpo.global@autopay.eu and delete the message without opening attachments.</p>
How long will you process my data?	<p>We will process your data for the shortest time possible.</p> <p>For individual cases, the processing time is as follows:</p> <ol style="list-style-type: none"> 1. If we process your data under a contract, the processing will last as long as the contract lasts and the statute of limitations for any claims.

	<ol style="list-style-type: none"> 2. If you have consented to processing for a specific purpose, we will process your personal data until you revoke your consent. 3. We will process data that we process in pursuit of a legitimate interest for as long as that interest lasts. In specific cases, which are the processing of data for direct marketing purposes, including profiling, we may process your data until you object. 4. We will process data processed in order for us to comply with our obligations under applicable laws for as long as those laws require.
Who will you share my data with?	<p>We do not share your data with third parties or entities. Exceptions to this rule are when:</p> <ol style="list-style-type: none"> 1. You voluntarily consent to such sharing. Your consent may be revoked at any time. 2. Sharing is necessary in order to provide the service. Recipients of your data may be: <ol style="list-style-type: none"> 1. Entities of the Autopay Capital Group (means Autopay Global sp. z o.o. and other entities related by capital or organization, in particular companies belonging to the same group as Autopay S.A., acting together under a unified business strategy)-for the purpose of intermediation in the preparation and presentation of offers, 2. Bank or other payment service provider - data necessary for the execution of the payment service, 3. Business and credit information bureaus - data necessary to obtain information on creditworthiness, 4. In specific cases, your data may be shared with entities authorized to do so under generally applicable laws (e.g. law enforcement agencies, other payment service providers). Each request for access is thoroughly investigated by us, and the transfer of data takes place only if, as a result of this analysis, we determine that there is a valid and effective legal basis for requesting disclosure of your data to these entities. <p>At the same time, you need to know that we use the help of external entities to perform some tasks, such as document shredding, data storage, and marketing services. In this case, we entrust personal data to subcontracted entities for a specific purpose, while still remaining the controller of your data and responsible for its security. The operations we perform are carried out using computer networks, including cloud servers with the participation of external third-party providers.</p> <p>We do not transfer your data to third countries.</p>

<p>Will my data be subjected to automated decision-making (including profiling)?</p>	<p>For some services, we use automated decision-making processes including profiling.</p> <p>The consequence of profiling may be the transmission of specific advertising to you, through the means of contact to which you have consented.</p> <p>Automated decision-making, including profiling, also takes place in the case of grouping of data from payment services in connection with assignment to a particular group of consumers.</p>
<p>How do you protect my data?</p>	<p>We take full responsibility for the security of your data that we process.</p> <p>We use appropriate technical and organizational security measures designed to ensure confidentiality, protection against unauthorized or unlawful processing and accidental loss, destruction or damage of your data. We protect your data primarily through the use of state-of-the-art technology, complying not only with applicable laws, but also using additional solutions to ensure the security of your data. The primary means of protection is the use of secure connections (e.g. SSL protocols), data encryption and the use of other technical, software or organizational solutions (e.g. restriction and control of access to data).</p> <p>We ensure that your data is processed only by authorized persons and entities.</p>
<p>What are my rights?</p>	<p>As you entrust us with your personal information, we have obligations to you that you have the right to enforce against us:</p> <ol style="list-style-type: none"> 1. You have the right to obtain from us information about whether we process your personal data, the purpose for which we process it, the categories of your data we have, the categories of recipients of your data, and our planned retention period for your data. 2. You have the opportunity to access the data we process, correct data that is incorrect or complete incomplete data. 3. You may request deletion of the data we process. We will comply with your request without delay, unless we are obliged by law to continue processing your data, there is an obligation that we have to comply with from the law, when your personal data is not necessary for us to establish, assert or defend claims, or there is no other legitimate interest that justifies further processing. We will delete your data when: <ol style="list-style-type: none"> 1. are no longer necessary for the purposes for which they were collected or otherwise processed, 2. we processed them on the basis of your consent, which you have withdrawn, and there is no other legal basis for processing,

3. you have objected to the processing of your data in pursuit of the legitimate interests of the controller, while there are no other circumstances that justify further processing,
 4. personal data were processed illegally,
 5. personal data must be deleted due to legal obligation.
4. You can withdraw your consent to our processing of your data at any time, as long as the basis for the processing is your consent. Data processing will therefore be legal until you withdraw your consent.
 5. You have the right to request us to restrict the processing of your data in case:
 1. you report that the data we process is inaccurate; this is limited to a period of time that allows you to verify the accuracy of the data,
 2. there is no legal basis for the processing, and you object to the definitive deletion of your data,
 3. we no longer need your data for the purposes for which we collected them, but you need them to defend your interests or pursue your claims,
 4. you have objected to the processing of your data; the restriction is in place until it is determined whether there is a basis for processing that overrides your objection.
 6. You have the right to object to our processing of your data in pursuit of a legitimate interest of the controller.
 1. We will immediately cease such processing, unless there is a basis overriding the objection made.
 2. Your objection will always be considered with respect to processing for direct marketing purposes, including profiling, to the extent that such profiling is related to direct marketing.
 7. Please be informed that as a result of your exercise of the rights indicated in sec. 3-6 above, it is possible that we may cease to provide you with certain services (in whole or in part) for the provision of which the processing of certain of your personal data is necessary.
 8. You have the right to receive your personal data that you have provided to us in a machine-readable format and to have this data transferred to another controller. This applies to data processed by automated means:
 1. that we process based on your consent, or
 2. Which we process on the basis of a contract concluded with you.

	<p>9. If you believe that your rights have been violated, you have the opportunity to file a complaint with the supervisory authority, i.e. the Inspector General for Personal Data or its successor, the President of the Office for Personal Data Protection.</p> <p>10. You have the right not to be subjected to automated decision-making, including profiling, if such actions produce legal effects on you or otherwise materially affect you. However, we may use automated decision-making when such a decision:</p> <ol style="list-style-type: none"> 1. is necessary for the conclusion or performance of the contract, 2. is permitted under separate legislation or 3. takes place after you give your consent. <p>11. If you are subjected to automated decision-making, including profiling, you have the right to obtain the intervention of our employee who will further verify your situation and the decision made, you can present us with your position or challenge the decision made.</p>
What are cookies?	Cookies are IT data, in particular small text files, recorded and stored on the device through which you use our websites.
How do you use cookies and similar technologies?	<p>We use cookies and similar technologies to store information or access information that is stored on the device through which you use our services. Through the use of cookies, we can customize services to your individual preferences, as well as profile and monitor your activity on our services.</p> <p>The cookies we use are safe for your devices and are free of viruses or unwanted software.</p> <p>Cookies contain the name of the domain from which they come, the time they are stored on your device and the assigned value. These cookies in no way allow you to download any information from your device, only to access selected information.</p>
What types of cookies are there?	<p>1. We use different types of cookies - they differ in type and durability. We can divide these files by the time they are stored on your device into:</p> <ol style="list-style-type: none"> 1. session cookies - are stored on your device and remain there until the session of a given browser ends. The stored information is then permanently deleted from your device's memory,

	<p>2. Persistent cookies - are stored on your device until they are deleted or expire, so ending the browser session will not remove them from your device.</p> <p>2. We can also divide the cookies we use by origin into:</p> <ol style="list-style-type: none"> 1. Own cookies - are placed on the services directly by us, 2. External cookies - placed on the sites by external entities whose site components were called by us (e.g. Google Analytics, Gemius SA, Crazy Egg, Dynatrace).
<p>For what purpose do you use cookie technology?</p>	<p>We use cookies for the following purposes, among others:</p> <ol style="list-style-type: none"> 1. configuration of websites, including adapting their content or functionality to your preferences and optimizing their operation, 2. Authentication of Users of our websites in order to maintain the session after logging in - it allows to move between subpages of the websites without the need to log in each time, 3. Creating anonymous statistics that allow us to analyze how our websites are used - so we can work on improving their structure and content, 4. to obtain information about the source from which a person came to our site (e.g., an advertising banner displayed on a third-party site), 5. Adjustment of the advertisements presented through the services, 6. To ensure the security and reliability of the services.
<p>How do I manage my consent to your use of cookies?</p>	<p>The use of cookies for the purpose of storing information or gaining access to information stored on your device is possible only if you give your prior consent to such action, unless storing or gaining access to the information is necessary for the provision of the telecommunications service or service provided electronically requested by you - in such a situation your consent is not required.</p> <ol style="list-style-type: none"> 1. You can give your consent through the settings of the software you use to use the services, such as the settings of the web browser you use or the software settings of the device you use. 2. You may withhold your consent or revoke it at any time by changing the relevant settings of your browser or the software installed on the device you are using. 3. In many cases, the software that enables you to use our services (primarily web browsers) allows cookies to be served and stored on your device by default. We therefore recommend that you check

your settings and, if necessary, make changes according to your privacy preferences. Remember that you have the option to change your settings to block the automatic handling of cookies.

4. If you agree that the settings of the software you are using allow cookies, this is equivalent to your consent for us to use them in accordance with the principles described in this Privacy Policy. In that case, we will be entitled to use cookies and similar technologies to store information or access information stored on your device.
5. If you choose to disable cookies, you may have difficulty using some of the functionality of our sites.

In providing electronic communication services or services provided electronically, we may also install software on your device or use this software. However, we will inform you before installing it and ask for your consent to install and use it.