

Privacy Notice

Pursuant to article 13 and art. 14 of regulation (EU) 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 regulation on data protection) ("**GDPR**"), we hereby adopt this Privacy Notice.

This Privacy Notice tells you how we look after your personal data when you visit our website at <https://popex.net> (**Website**), use our non-fungible tokens (**NFTs**) platform (**Platform**), including if you purchase NFTs from the Platform. It sets out what information we collect about you, what we use it for, whom we share it with, explains your rights and what to do if you have any concerns about your personal data. We may sometimes need to update this notice, to reflect any changes to the way our Website and/or Platform are provided or to comply with new legal requirements. We will notify you of any important changes before they take effect. Last updated: 11 March 2022

1. Data Controller

The controller of your personal data is **Raven 28 spółka z ograniczoną odpowiedzialnością** with registered seat at Rondo ONZ 1, p.12, 00- 124 Warsaw, entered into register of entrepreneurs kept by the District Court in Warsaw, XII Commercial Division of the National Court Register under the number KRS 0000898568, holder of NIP: 5252861419 and REGON: 388906560, share capital amounts to 5 000 PLN (**we/us/our**).

In all matters relating to processing of your personal data, please contact us:

- i) by sending a registered mail to the address: Raven 28 spółka z ograniczoną odpowiedzialnością, Rondo ONZ 1, p.12, 00- 124 Warsaw;
- ii) by sending an e-mail to the address: hello@popex.net

2. Data protection officer

We have not designated a data protection officer.

3. The information we collect about you

Personal data means any information which does (or could be used to) identify a living person. We have grouped together the types of personal data that we may collect from you below:

- **Contact Data** – email address, telephone numbers;
- **Photo and Image Data** – profile picture, other images, videos and audio uploaded by you;
- **Profile Data** – username, password, preferences, chat logs, content, including your posts, responses, and series published by you on our Platform;

- **Technical Data** - internet protocol (IP) address, time zone setting and generic location, browser plug-in types and versions, operating system and platform on the devices you use to access our Website and/or Platform;
 - **Usage Data** - information about your visit to our Website and/or Platform including the clickstream to, through and from our site, information you viewed or searched on Website and/or Platform, page response times, download errors, length of visits, page interaction;
- Feedback** – information and responses you provide about our Website and/or Platform;
- **Technical and Usage Data** - information about your visit to our Website, Platform and internet protocol (IP) address, browser type, browser plug-in types and versions, operating system and platform on the devices you use to access our Website and/or Platform; and
 - **Marketing Data** – information you submit to confirm whether you wish to receive marketing from us and which method you prefer to be contacted by.

We collect personal data of:

- Website visitors (IP address) and Website users ("**Users**");
- Users' representatives;
- Persons contacting us via the contact form on the Website or by e-mail;
- Persons who wish to receive our newsletter.

4. **How we use your information**

We are required to identify a legal justification (also known as a **lawful basis**) for collecting and using your personal data. There are six legal justifications which organisations can rely on.

The table below sets out the lawful basis we rely on when we use your personal data. If we intend to use your personal data for a new reason that is not listed in the table, we will update our privacy notice.

Purposes	Justification and legal basis
----------	-------------------------------

<p>Providing electronic services:</p> <ul style="list-style-type: none"> • Website and/or Platform; • Insight on how our Website and/or Platform are being used; • Administering and protecting our Website and Platform; • Handling requests for technical support and other queries; • Notifying you about changes to our privacy notice. 	<p>Necessity to perform the contract with you, or to take action at your request before concluding the contract Legal basis: Article 6 paragraph 1 letter b of GDPR</p>
<p>Issuing an invoice or other accounting documents and storing them in the accounting documentation</p>	<p>Necessity to fulfill our legal obligation Legal basis: Article 6 paragraph 1 letter c of GDPR</p>
<ul style="list-style-type: none"> • Asking you to provide feedback about our Website and/or Platform; • Completing the registration form on the Website; • Newsletter and sending marketing offers 	<p>Consent to the processing of your personal data Legal basis: Article 6 paragraph 1 letter a of GDPR</p>
<p>Establishing and pursuing claims by us and defending against legal claims</p>	<p>Legitimate interests (to protect our business and defend ourselves against legal claims) Legal basis: Article 6 paragraph 1 letter f of GDPR</p>

We may **anonymise** the personal data we collect (so it can no longer identify you) and then combine it with other anonymous information so it becomes **aggregated data**. Data protection law does not govern the use of aggregated data and the various rights described below do not apply to it.

5. Who we share your information with

We share (or may share) your personal data with:

- **Our personnel:** our employees (or other types of workers) who have contracts containing confidentiality and data protection obligations;
- **Our supply chain:** other organisations that help us provide our Website and/or Platform. We ensure these organisations only have access to the information required to provide the support we use them and have a contract with them that contains confidentiality and data protection obligations;
- **Strategic Partners:** such as platform providers;
- **Our professional advisers:** such as our accountants or legal advisors where we require specialist advice to help us conduct our business; and
- **Any actual or potential buyer of our business;**
- **Entities authorized under the provisions of applicable law,** in particular institutions authorized to control our activities or institutions authorized to obtain personal data on the basis of legal provisions

6. Where your information is located or transferred to

We store your data in IT infrastructure provided by external entities, including e-mail boxes whose servers may be located outside the European Economic Area, and transfer your personal data to recipients based outside the European Economic Area. We process personal data in accordance with the requirements of the GDPR, including in art. 46 GDPR, in particular on the basis of standard contractual clauses.

More information about the existing security measures implemented to ensure the processing of personal data in accordance with applicable regulations, and the possibility of obtaining a copy of the data or information on place and method of making data available, you can receive by contacting us in the manner set out in this Privacy Notice.

Moreover, if you access our Website and/or Platform whilst abroad then your personal data may be stored on servers located in the same country as you are.

7. How we keep your information safe

We have implemented security measures to prevent your personal data from being accidentally or illegally lost, used or accessed by those who do not have permission. These measures include:

- access controls and user authentication
- internal IT and network security
- regular testing and review of our security measures
- staff policies and training
- incident and breach reporting processes

- business continuity and disaster recovery processes

If there is an incident which has affected your personal data and we are the controller, we will notify the regulator and keep you informed (where required under data protection law). Where we act as the processor for the affected personal data, we notify the controller and support them with investigating and responding to the incident.

If you notice any unusual activity on the Website or Platform, please contact us at hello@popex.net.

8. How long we keep your information

We will only retain your personal data:

- for as long as necessary to fulfil the purposes we collected it for .i.e. performance of the agreement concluded with you, after such a period, your data will be processed until the claims are time-barred;
- for the period resulting from the relevant provisions of law;
- If you browse our Website and/or Platform, we keep personal data collected through our analytics tools for only for as long as necessary to fulfil the purposes we collected it for;
- If you have asked for information from us or you have subscribed to our mailing list, or in any case of data processing for marketing purposes - we keep your details until you withdraw your consent .

To decide how long to keep personal data (also known as its **retention period**), we consider the volume, nature, and sensitivity of the personal data, the potential risk of harm to you if an incident were to happen, whether we require the personal data to achieve the purposes we have identified or whether we can achieve those purposes through other means (e.g. by using aggregated data instead), and any applicable legal requirements.

9. Your legal rights

You have specific legal rights in relation to your personal data.

It is usually free for you exercise your rights and we aim to respond within one month (although we may ask you if we can extend this deadline up to a maximum of two months if your request is particularly complex or we receive multiple requests at once).

We can decide not to take any action in relation to a request where we have been unable to confirm your identity (this is one of our security processes to make sure we keep information safe) or if we feel the request is unfounded or excessive.

If your request is manifestly unfounded or excessive, in particular because of its repetitive character:

- We may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested;

- We may refuse to act on the request,

If this happens, we will always inform you in writing.

We do not respond directly to requests which relate to personal data for which we act as the processor. In this situation, we forward your request to the relevant controller and await their instruction before we take any action.

Your legal rights in respect of your personal data include:

- **Access and copy:** You must be told if your personal data is being used and you can ask for a copy of your personal data as well as information about how we are using it;
- **Correction:** You can ask us to correct your personal data if it is inaccurate or incomplete;
- **Deletion:** You can ask us to delete or remove your personal data if there is no good reason for us to continue holding it or if you have asked us to stop using it. If we think there is a good reason to keep the information you have asked us to delete, we will let you know and explain our decision;
- **Restriction:** You can ask us to restrict how we use your personal data;
- **Objection:** You can object to us using your personal data. If we think there is a good reason for us to keep using the information, we will let you know and explain our decision;
- **Portability** if your personal data are processed on the basis on the agreement concluded with us: You can ask us to send you an electronic copy of your personal data;
- **Withdraw** of your consent to the processing of personal data for a specific purpose: if your personal data are processed on the basis on your consent and
- **Complaints:** If you are unhappy with the way we collect and use your personal data, you can complain to Chief of the Office of Personal Data Protection, Stawki Street 2, 00-190 Warsaw..

If you wish to make any of the right requests listed above, you can reach us at hello@popex.net.

10. Principles of collecting personal data

Providing personal data is voluntary, but necessary for the conclusion and implementation of the agreement for the provision of electronic services.

11. The source of personal data

We obtain personal data directly from you or from our contractors.

12. Our cookie policy

We use cookies and similar technologies on our Website and Platform. **Cookies** are small text files that are downloaded to your device. Cookies contain a uniquely generated references which are used to distinguish you from other users. They allow information gathered on one webpage to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and provide website owners with statistics about how you interact with their websites.

Cookies are not harmful to your devices (like a virus or malicious code), but some individuals prefer not to share their information (for example, to avoid targeted advertising).

What do we use cookies for?

We use cookies to:

- to implement or change the Website and/or Platform in real life;
- to track how visitors use our Website and/or Platform;
- to record whether you have seen specific messages we display on our Website and/or Platform;
- to keep you signed into our Website and/or Platform; and
- to capture and analyse information such as number of your views and shares.

We can only use cookies with your permission (you will be prompted by a message when you first visit our Website and/or Platform, also known as a cookie banner, where you can choose to accept or decline our cookies). You can update your settings on our Website.

You can choose to decline cookies but if you turn off necessary cookies, some pages and functions on our Website and/For Platform may not work properly.

You can also manage cookies through your browser settings or device settings (your user manual should contain additional information).

You can also delete cookies directly with the relevant third parties (for example, you can disable Google Analytics on their website).

13. Automated decision making, including profiling. We may make decisions based on automated processing, including profiling, based on the personal data of persons using the Website.

In other cases, the we do not make automated decisions, including decisions resulting from profiling based on your personal data