

Bratislava, 24.02.2025

PRIVACY POLICY

INTRODUCTION.

- 1 This policy with regards to the processing and protection of personal data (herein this „**Policy**“) was adopted by **Arbitas s.r.o.** with its seat at Ul. svornosti 42, 821 06 Bratislava, Slovak Republic, corporate ID 47 818 875 (herein also „**Arbitas**“ or „**we**“, „**us**“ or the like) that processes your personal data in course of operation of online platform Arbipay in its capacity as controller within the meaning of Art. 4 (7) General data protection regulation (herein the „**GDPR**“).
- 2 Please acquaint yourself with the information in this Policy carefully in order to ascertain what categories of your personal data as data subject within the meaning Art. 4 (1) GDPR we collect, how we use these data and under what circumstances we share these with third parties. By visiting our website www.arbipoint.sk (herein the „**Website**“), by using the ArbiPoint platform via self-service ArbiPoint kiosks or by way of using ArbiPoint online payment gateway on other websites, you confirm you consent with the procedure outlined in this Policy.
- 3 Arbitas operates a commercial platform ArbiPoint accessible online via the Website, as well as via self-service ArbiPoint kiosks located on the premises of cooperating merchants. Arbitas further operates a payment gateway enabling processing of cashless payments for goods and services via websites of third parties – merchants on the ArbiPoint platform.
- 4 It is possible that Arbitas engages third parties into the processing of personal data, which third parties shall carry out certain functions on its behalf. Arbitas is in any such case responsible for safeguarding that such third parties will handle such personal data in accordance with the valid legislation and given instructions. We may also require certain security measure and monitor the implementation thereof. Under these circumstances we guarantee obligation of reticence that will bar such third parties from using the personal information outside of the scope of their engagement with us.

Purpose of processing. Recipients.

- 5 Provision of your personal data is inevitable for using of the ArbiPoint platform. Personal data provided to us by you are processed mainly for the purpose of carrying out the legally required processes of Client identification and identification verification and processing of payment operations.
- 6 We process the collected personal data over period set forth in applicable legal regulations, mainly Act No. 297/2008 Coll. *on protection against legalization of proceeds from criminal activities and on protection against the financing of terrorism, amending and supplementing certain other statutes* (herein the „**AML Act**“).
- 7 **PURPOSE:** Client identification and identification verification, processing of payment operations via payment gateway and kiosks; execution of other legal duties.

Personal data collected toward said purpose are processed for the following purposes: (i) Client identification and identification verification; (ii) processing of payment operations in accordance with the valid legislation, performance of monitoring of business relationship and ascertaining Clients' risk level; (iii) prevention of money laundering financing of terrorism and fraud; timely detection, investigation and informing of such activities; (iv) effective company risk management.

Within the above outlined purpose, the following types of personal data are processed: name, surname, national identifier, residence address, date of birth, data concerning ID, photograph, video, nationality, e-mail address, telephone number, IP address, as well as any other information as required by the AML Act.

Categories of recipients of personal data:

Supervisory authorities; credit, financial, payment, and/or electronic money institutions; state and public administration bodies; recipients of transaction funds who receive information in payment statements; debt collection agencies; companies processing consolidated debtor files; lawyers and law firms; auditors; providers of credit/debit card processing services; providers of identity verification services and screening of sanction lists and politically exposed persons lists; providers of transaction monitoring services; providers of risk management tools; website hosting providers; cloud service providers.

Client personal data may be provided to third parties not listed above only for specified and legitimate purposes, and only to third parties that have the right established by laws and other legal acts to obtain personal data in the countries of the European Union and the European Union.

- 8 **PURPOSE:** Management of Client relationships, dispute prevention (recording of phone conversations), correspondence related to business relations with the Client.

Processing of personal data may occur for the following reasons: protection of the Client's interests; prevention of disputes, providing evidence of business communication with the Client (recordings of conversations, correspondence); ensuring the highest quality of services provided by Arbitas; handling Client requests in accordance with obligations arising from the applicable legislation.

The following data may be processed with regards to the Client: first name, last name, address, date of birth, email address, phone number, IP address, phone call recordings, correspondence with the Client.

Categories of recipients of this personal data: supervisory authorities, companies processing consolidated debtor files, lawyers, court bailiffs, courts, debt collection agencies, other entities with a legitimate interest.

Access to such data will not be granted to any persons from third countries.

- 9 **PURPOSE:** Informing the Client of offered services.

Client data is processed for the purpose of informing the Client about the services provided by Arbitas, their prices, specifications, and for sending system and other messages related to the provision of services by Arbitas.

For the above-mentioned purpose, the following personal data of the Client are processed: email address, phone number.

Recipients of personal data: We do not provide access to these personal data to any third party.

- 10 Personal data collected for the purposes stated in this Policy will be processed only for legitimate purposes in ways that meet legal requirements.

Profiling.

- 11 Arbitas may use automated means of processing personal data in accordance with the provisions of legislation related to risk management and the systematic monitoring of transactions to prevent fraud; such profiling is justified by Arbitas' legitimate interests and legal obligations.

Cookies.

- 12 Cookies are used to distinguish you from other users of the Website. This helps ensure a pleasant experience while navigating the Website and also allows for its improved organization. From a technical perspective, cookies are small files containing a string of characters that are sent to a person's computer when visiting a website. Cookies allow the website to recognize the person's browser upon their next visit to the web location and can detect user preferences and other information.
- 13 Like most website administrators, Arbitas also monitors website traffic and automatically collects information about the number of visitors browsing the Website, the domain name of visitors' internet service providers, etc. Such cookies are necessary for technical reasons to ensure the efficient operation of the Website (website management, maintaining security, measuring or understanding the effectiveness of advertising, etc.), as well as for tracking and targeting the interests of Users and Clients to improve their experience.
- 14 By using the Website, you agree to the cookie usage policy unless you block the storage of cookies by changing your browser settings; if you change the settings, the functionality of the Website may be affected.

Data subjects' rights.

- 15 As the data subject whose personal data we process, you have the following rights:
- a. RIGHT TO ACCESS TO INFORMATION: right to be informed of whether Arbitas does or does not process your personal data and access to pertaining information.
 - b. RIGHT FOR RESTRICTION OF PROCESSING: you have the right to require that we not process your personal data for marketing purposes by way of contacting us at dpo@arbitas.com.
 - c. Should you for any reason whatsoever be under the impression that the processing of your personal data infringes upon your rights and legitimate interests protected by the valid legislation, you may contact the supervisory authority – Data Protection Office of the Slovak Republic (*Úrad na ochranu osobných údajov Slovenskej republiky*), website <https://dataprotection.gov.sk/>.
- 16 As the data subject, you shall have the right to withdraw your consent at any time. Such withdrawal shall not affect the lawfulness of processing based on consent before its withdrawal.

Governing law

- 17 This Policy is subject to the laws of the Slovak Republic.

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