

INFORMATION ON THE PROTECTION OF PERSONAL DATA

General

1. This document contains the principles of protection and processing of personal data of business Users. These principles of personal data processing (hereinafter referred to as the “**Principles**”) are processed by Invity and reflect the procedure for processing personal data in accordance with Act No. 110/2019 Coll., on the processing of personal data, and Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter referred to as the “**GDPR Regulation**”).
2. Invity is the operator of the Invity App and Website.

Data controller

3. Invity is the controller of personal data. Matters relating to the processing of personal data can be addressed to the email address: gdpr@invity.io or by post to the address Kunderatka 17/a, Libeň, 180 00 Prague 8.

Data subject

4. The data subject is the User.

Purposes for processing personal data and legal basis for processing

5. Invity processes Users' personal data for the purpose of enabling the provision of Services through the Invity App and Website. This primarily concerns the processing of personal data in connection with:
 - a. creation of User Account
 - b. performance of the contract concluded between the User and Invity;
 - c. management of User Account in the Invity App and Website;
 - d. sending information via the Invity App and Website;
 - e. fulfillment of legal obligations on the part of Invity (e.g., pursuant to Act No. 253/2008 Coll., on certain measures against the legalization of proceeds from criminal activity and financing of terrorism (“**AML Act**”);
 - f. sending marketing materials (based on legitimate interest or if the data subject has given their consent).
6. Invity processes personal data primarily on the basis of Article 6(1)(b) of the GDPR, according to which the legal basis for the processing of personal data is its necessity for the performance of a contract and for the implementation of measures taken prior to the conclusion of the contract at the request of the data subjects. Invity also processes personal data pursuant to Article 6(1)(c) and (f) of the GDPR, according to which the legal basis for the processing of personal data is its necessity for the performance of Invity's legal obligations and its necessity for the purposes of the legitimate interests of Invity or a third party (for the purposes of direct marketing and

targeting marketing offers). Invity also processes personal data on the basis of Article 6(1)(a) of the GDPR, according to which the legal basis for the processing of personal data is the data subject's consent to the processing for a specific purpose.

Personal data processed

7. For the above purposes, Invity processes the following personal data:
 - a. identification data – in particular name, surname, birth number, date of birth, permanent address, nationality, bank account number, type and number of identity card, business name, place of business, ID number of the natural person conducting business;
 - b. contact information – in particular, address for delivery of documents, telephone number, email address;
 - c. biometric data – facial image records;
 - d. information about the job position;
 - e. information about the financial situation of Users;
 - f. copies of identity documents;
 - g. information about the Services used by the User.

For how long is personal data processed?

8. Personal data is processed for the entire duration and effectiveness of the Terms and Conditions and subsequently for a period of 3 years from the date of termination of the contractual relationship established by the Terms and Conditions. After this period, personal data is destroyed unless there is another legal basis for its processing. If personal data is processed solely on the basis of consent to the processing of personal data, it is processed for a period of 5 years from the date of consent, unless the data subject revokes their consent before the expiry of this period. In the event of the processing of personal data required by law, such data shall be retained for the period specified therein. This applies in particular to processing within the framework of the AML Act, with a retention period of 10 years after the termination of the relationship established by the Terms and Conditions with the User.

Transfer of personal data to other entities

9. In order to enable the provision of Services, Invity provides personal data to legal and financial advisory and technical support providers who cooperate with Invity in the provision of Services. Without personal data, these entities are unable to perform their activities leading to the use of the Services. This may also include sharing Users' biometric data (facial images records) with identity verification service providers, solely for the purpose of identity verification.
10. In order to comply with the provisions of Regulation (EU) 2023/1113 of the European Parliament and of the Council of 31 May 2023 on information accompanying transfers of funds and certain crypto-assets and amending Directive (EU) 2015/849,

Inivity transfers the necessary identification and transaction data to other obligated entities involved in the transfer of Bitcoins.

11. When processing personal data, Inivity may sometimes use suppliers who, under certain circumstances, transfer personal data to third countries. In such cases, personal data is transferred in accordance with the conditions set out in the GDPR, in particular on the basis of standard contractual clauses.

Automated decision-making

12. In order to provide certain Services, Inivity may use automated decision-making. Automated decision-making is a process whereby a computer assesses and decides on the situation of a data subject. This enables Inivity to immediately assess whether certain Services are suitable for the User.

Personal data security

13. Inivity uses a number of measures to ensure maximum security and minimize the risk of leakage and misuse of personal data. These include, in particular, restricting physical access to business premises, designating only a limited number of specific individuals who have access to the data and who are bound by confidentiality obligations in relation to such data, using professional security programs, and securing the computer network used to operate the Inivity App and Website.

Data subject rights

14. The data subject has the following rights, which they may exercise against the Company at any time:
 - a. the right to be informed about the processing of personal data;
 - b. the right to access your personal data (the right to find out whether Inivity is processing your personal data and, if so, the right to access that data);
 - c. the right to rectification of personal data (if Inivity processes inaccurate personal data, the data subject has the right to have Inivity rectify such data without undue delay);
 - d. the right to erasure (i.e., the “right to be forgotten” – the right to request that Inivity erase the data subject’s personal data if there is no longer a legal reason for further processing);
 - e. the right to restrict the processing of personal data (the right to temporarily restrict the processing of personal data if the data subject believes that the personal data is inaccurate; that the processing of personal data is unlawful, but requires restriction of processing instead of erasure; the data subject requires the data for the establishment, exercise, or defense of legal claims and Inivity no longer needs the data for processing purposes; the data subject has objected to the processing of the data on the grounds of Inivity’s legitimate interest in processing the data, pending verification of that interest);

- f. the right to data portability (the right to obtain your personal data from Invity and transfer it to another controller or request Invity to transfer it to that controller);
- g. the right to object (the data subject has the right to object to the processing of their personal data based on Invity's legitimate interest);
- h. the right to withdraw consent to the processing of personal data (if personal data is processed on the basis of the consent of data subjects, the data subject has the right to withdraw their consent at any time);
- i. the right not to be subject to solely automated decision-making (where the data subject uses services based solely on automated decision-making, they have the right to human intervention, to express their opinion, or to challenge the decision);
- j. the right to file a complaint with the supervisory authority (if the data subject believes that their right to personal data protection has been violated, they have the right to file a complaint with the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7, <https://uoou.gov.cz/> +420 234 665 111).

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