

PRIVACY POLICY

We have prepared this privacy policy in connection with our information obligations under the article 13 and 14 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 (General Data Protection Regulation), hereinafter referred to as "GDPR".

Please read this Policy carefully.

1. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?

The controller of your personal data is **Fundacja XTB** with its registered office in Warsaw, Poland, 67 Prosta St., 00-838 Warsaw, entered into the Register of societies, other community and professional organizations, foundations, and public health care facilities maintained by maintained by the District Court for the capital city of Warsaw, XIII Commercial Division of the National Court Register under no. KRS 0000861567, REGON 387782540, NIP 527-294-52-08. In this Policy, references to "we", "us" or "XTB Foundation" are references to Fundacja XTB.

2. HOW CAN YOU CONTACT US?

You can contact us:

1. By e-mail: office@xtb.com,
2. By post: 67 Prosta St., 00-838 Warszawa, Poland.

3. WHERE DO WE GET YOUR PERSONAL DATA FROM AND WHAT TYPE OF DATA WE OBTAIN

We obtain your personal data that we process directly from you. We may obtain some of your personal data, depending on the specific situation, e.g. name, surname, e-mail address or telephone number, from entities to which you have given your consent for their transfer (e.g. entities co-organizing educational events with us). In addition, we may also obtain your personal data from persons representing you on the basis of a power of attorney granted to them.

From the sources indicated above, we may also obtain additional data, such as:

- IP address,
- the type of device from which you connect to the website,
- the name of the domain from which you access the website;
- location data;
- aggregate information about what content is visited on the website.

4. FOR WHICH PURPOSES WILL WE USE YOUR PERSONAL DATA?

Currently, the Site only uses cookies provided by a third party. Such cookies are beyond the our control, therefore we are unable to provide full information about them. They are governed by the regulations of the providers, and their indication here is for informational purposes only. We make every effort to keep the information up to date, but we cannot guarantee their accuracy.

If the basis for the processing of your personal data is consent, you have the right to withdraw your consent at any time without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal.

For more information about cookies used by the website please check Schedule 1.

5. WITH WHOM WE SHARE YOUR PERSONAL INFORMATION

Cooperating entities

We may share your personal information with cooperating entities, i.e. companies that are in constant cooperation with the XTB Foundation and are part of the XTB capital group. The information is provided only to the extent necessary for the ongoing operation, support and development of the website.

Location

Proper operation of the website may require the transfer of personal data to entities providing services to us in other countries, including countries outside the European Economic Area. In the case of transfers to countries which do not provide an adequate level of protection for personal data, we apply safeguards in the form of one of the legal instruments provided for in the GDPR such as, among others, decisions of the European Commission on the determination of an adequate level of protection in a third country, standard contractual clauses approved by the European Commission or a supervisory authority of a Member State, approved codes of conduct in a given industry or binding corporate rules. You may obtain a copy of your data.

6. WHAT RIGHTS YOU HAVE IN CONNECTION WITH THE PROCESSING OF PERSONAL DATA

Right to object to processing of your personal information

Pursuant to Article 21 of the GDPR, you have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data, if we process the data based on our legitimate interest.

Right to restrict use of your personal information

Pursuant to Article 18 of the GDPR, you have the right to obtain the restriction of processing where one of the following applies:

- you question the accuracy of your personal data (in which case we will restrict its use for the time needed to verify the accuracy of your personal data),
- the processing of your data is unlawful, and instead of erasing your data you request that we restrict its use,
- your personal data are no longer necessary for the purposes for which they were collected, but are required for the establishment, exercise or defence of legal claims,
- you have objected to the use of your data (in which case we restrict the processing of your data for the time needed to consider whether the protection of your interests, rights and freedoms outweighs the interests we pursue in processing your personal data).

Right to access, correct and delete your personal information

Article 15 of the GDPR states that you have the right to obtain confirmation from us as to whether your personal data is being processed. If this is the case, you have the right to access your personal data, to obtain information about, among other things, the purposes of the processing, the categories of personal data processed, the intended period of data retention or the criteria for determining that period, your rights under the GDPR, the right to lodge a complaint with a supervisory authority, any available information about the source of the data if it was not collected from you, automated decision-making, including profiling as referred to in Art. 22 (1) and (4) of the GDPR, and - at least in these cases - about relevant information about the principles of such decision-making, as well as about the significance and anticipated consequences of such processing for you. In addition, you have the right to be informed of the appropriate safeguards referred to in Article 46 of the GDPR related to the transfer of data if they are transferred to a third country or international organization. In addition, you have the right to receive a copy of any personal data we hold about you and to inform us of any inaccuracies we notice. For any further copies you request, we may charge a reasonable fee based on administrative costs. We point out that the right to obtain a copy of your data must not adversely affect the rights and freedoms of others

If your personal data has changed or you want us to rectify your personal data that we process, please notify us immediately. The right to rectify personal data is provided for in Article 16 of the GDPR and applies only to personal data that is incorrect. In accordance with your instruction, we will amend, correct or delete your personal data from our database, except, however, to the extent that we are required to keep it by regulation or law in order to maintain relevant business records.

Right to data portability

Pursuant to Article 20 of the GDPR, you have the right to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format, if the processing is based on consent or on a contract and the processing is carried out by automated means. You also have the right to request that the personal data be sent by the controller directly to another controller, if technically possible.

Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint to the supervisory authority if you believe that our processing of your personal data violates the provisions of the GDPR. This right stems from Article 77 of the GDPR. Under Polish law, the relevant authority is the President of the Office for Personal Data Protection.

7. HOW LONG WOULD TAKE US TO FULFILL YOUR REQUEST?

If you make a request to us to exercise any of the abovementioned rights, we either comply with the request or refuse to comply with it immediately. On the other hand, we provide information about the action taken on the request under Articles 15-22 of the GDPR within a maximum of one month after the request is made. In the event that we cannot fulfill your request within one month due to the complexity of the request or the number of requests received, we will fulfill it within another two months. We will inform you in advance of the intended extension of the deadline with the reason for the delay.

8. DO WE MAKE AUTOMATED DECISIONS AND PROFILING?

Regardless of the origin and purpose of processing your data, you will not be subject to decisions based solely on automated processing, including profiling.

9. USE OF COOKIES – COOKIE FILES

We use cookies to collect information about users of our website. We have included details about this in the sections „Why we use cookies?” and „What types of cookies do we use”.

What are cookie files?

Cookies are small files, which often include a unique identification number or value, which are stored on your computer’s hard drive as a result of you using this trading software and accessing this website. They typically contain the name of the originating website, the length of time they are stored on the end device and a unique number.

Why do we use cookies?

We use cookies to:

- provide you with a more precise and convenient use of our website by customizing their content to your preferences and optimizing your use of them,
- identifying the source from which you came to our website.

What types of cookies do we use?

We use the following main types of cookies:

- **essential cookies** – these cookies necessary to the operation of the website and cannot be disabled on our systems. Necessary cookies are typically used in response to actions you take, such as setting privacy options, logging in or filling out forms. You can change your browser settings to block them, but our website will then not function properly.
- **analytics cookies** – this type of cookie allows us to measure the number of visits and collect information about traffic sources so we can improve the performance of our website.

They also help us learn which pages are most popular or how visitors navigate through them. If you block this type of cookie we will not be able to collect information about the use of the website and will not be able to monitor its performance.

- **functional cookies** – this type of cookie helps us improve the effectiveness of our marketing activities and customize them to your needs and preferences, such as by remembering any choices you make on the sites.
- **persistent cookies** – stored in your terminal equipment for the period of time defined in the parameters of the cookies files, or by the time they are deleted by you.
- **session cookies** – stored in your terminal equipment by the time of logging-out or closing web browser.

Managing cookies

Cookies are frequently used by many websites on the Internet. You can choose whether and how a cookie will be accepted by changing the preferences and options in your browser. If you choose to disable cookies in your browser, you may not be able to access some parts of our website.

Please find the tips on how to manage cookies in popular browsers:

[Google Chrome](#), [MacOS Safari](#), [Mozilla Firefox](#), [Microsoft Edge](#)

Please be advised that restrictions on the use of cookies may affect the operation of certain functionalities available on our website.

Failure to change your browser settings to block the storage of cookies is equal to your consent to their storage.

You can find more information about cookies here: www.aboutcookies.org.

This policy covers the use of cookies only by our website and does not apply to the use of cookies by any third party.

Links to other websites

Our website provides links to sites operated by other entities. We provide these links for your convenience, however, we do not review, control or monitor the privacy practices of sites operated by other entities. This privacy policy does not apply to sites operated by third parties. We are not responsible for the activities of sites operated by third parties or for your transactions with such third parties. We encourage you to read the privacy statements posted on partner sites, particularly if your personal information is collected through them.

10. FINAL PROVISIONS

We make all necessary efforts to ensure the security of the personal data you provide to us. Nevertheless, we also recommend that you take measures on your own. Such actions may include, for example, installing anti-virus programs, changing your password, not clicking on foreign links, and not sharing your data with third parties.

We reserve the right to make changes to this Privacy Policy. Changes are made by posting the new content of the Privacy Policy on our website. Changes are effective from the moment they are made. We encourage you to periodically review the contents of this Privacy Policy in order to keep abreast of changes to its contents.

Your use of our website constitutes your acceptance of the contents of this Privacy Policy.

Any disputes regarding this Privacy Policy not resolved amicably shall be settled by a common court of competent jurisdiction.

Schedule 1 – Cookies used by the website

Google Analytics

Type of cookie	Cookie name	Default expiration time	Description	Creation time
Analytics cookies	_ga	2 years	Used to distinguish users	On accept cookies
	_ga_HXS023G0GY	2 years	Used to persist session state	On accept cookies

Data collected:

Google Analytics collects first-party cookies, data related to the device/browser, IP address and on-site/app activities to measure and report statistics about user interactions on our website.

What is the data used for:

Cookies are used to measure user interactions with our website, while IP addresses are used to provide and protect the security of the service, and to give us feedback, from where do our site visitors come from.