

Business Credit s.r.o.

Company registration number: 280 81 226

Za Mototechnou 1619, Stodůlky, 155 00 Prague 5

Incorporated with the Municipal Court in Prague under file number C 260867

BCPAY PRIVACY POLICY

This Privacy Policy is provided under section 5 (2) (a) of Act No. 101/2000 Coll. on the protection of personal data and on amendments to certain acts, as amended, and with effect from 24 February 2021 under Art 6 (1) (c) of Regulation (EU) No. 2016/679 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 No. 95/46/EC.

1. ABOUT THE BCPAY COMPANY

BCPay (hereinafter also referred to as the "Data Controller") shall mean commercial company Business Credit s.r.o., with the registered office at Za Mototechnou 1619, Stodůlky, 155 00 Prague 5, company registration number: 28081226. "We", "us", "our", etc. that may be used in this Privacy Policy shall also have the same meaning. Business Credit s.r.o. provides technological and clearing house infrastructure facilities for global or domestic account receivables and payable transactions management and processing, in connection with a trade or business for commercial purposes.

This Privacy Policy (hereinafter referred to as the "Privacy Policy") governs the way we treat the processing of personal data and provide their protection in the BCPay Payment System. We are bound by Czech Act No. 101/2000 Coll. on the protection of personal data and on amendments to certain acts, as amended (hereinafter referred to as the "PDPA"), and with effect from 24 February 2021 by Regulation (EU) No. 2016/679 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 No. 95/46/EC (hereinafter referred to as the "GDPR Regulation").

Pursuant to section 2 (1) (b) point 5 of Act No. 253/2008 Coll. on selected measures against legitimisation of proceeds of crime and terrorist financing (hereinafter referred to as the "Anti-Money Laundering Act" or the "AML Act"), Business Credit s.r.o. is the obliged entity.

Under section 7, section 8 of the AML Act, obliged entity Business Credit s.r.o., in order to prevent the misuse of the financial system for money laundering and terrorist financing, is obliged to identify its clients within the scope of the personal data below and, in cases provided by law, also to perform client checks under section 9 of the AML Act.

2. TYPES OF PROCESSED DATA

Within the meaning of Act No. 101/2000 Coll. on the protection of personal data and on amendments to certain acts, as amended (hereinafter referred to as the "PDPA"), and with effect from 24 February 2021 within the meaning of the GDPR Regulation, we are entitled to process your personal data (hereinafter referred to as the "PD") to the following extent:

- Name, surname, title, birth identification number or the date of birth, place of birth, sex;

- Permanent residence or other residence and nationality, telephone number, e-mail address;
- Copies of personal documents proving your identity;
- For an entrepreneur: registered business name, place of business and person's identification number
- Bank account number
- Details of executed as well as cancelled payment transactions;
- Credit, debit or any other payment card details, including the PAN number and the expiration date
- Information obtained from BCPay questionnaires or similar forms
- IP address
- Information about your visits to our website, in particular the traffic data, in order to fulfil the legal obligations of the data controller under section 9 of the AML Act.
- The PD processing period is 10 years from the date of the transaction or from the termination of the business relationship between you and the data controller (whichever comes later). You are aware that you, as the data subject, cannot revoke this consent.
- The data controller is entitled to provide this information to the relevant state authorities upon request and you are aware of this.
- If a personal data breach is likely to result in a high risk to the data subject's rights and freedoms, the data controller shall notify all data subjects of this breach without delay.

3. RIGHTS OF DATA SUBJECTS

3.1. A data subject may request information on the processing of his/her personal data and the data controller shall be obliged under section 12 of the Personal Data Protection Act to transmit this information without delay. The obligation of the data controller to provide information to the data subject is regulated in section 12 of the PDPA.

3.2. Every data subject under section 21 of the Personal Data Protection Act, if he/she/it suspects that the data controller or data processor is handling data contrary to the protection of personal and private data or in conflict with the law, in particular, if personal data are inaccurate, taking into account the purpose for which the data is being processed, has the right to

3.3. ask the data controller or the data processor for clarification

3.4. ask the data controller or the data processor for correction,

3.4.1. by blocking

3.4.2. by correcting

3.4.3. by completing or deleting personal data

3.5. If the data subject has incurred consequent injury as a result of personal data processing, it is proceeded under a special law to enforce his/her/its claim.

3.6. If obligations were breached in respect of the data controller or the data processor during personal data processing, they are jointly and severally liable for them.

3.7. The contact details of the data protection officer of the data controller are as follows:

a) Vlastimil Sokach,

E-mail: info@bcpay.me,

+ 420296330873

4. FINAL PROVISIONS

4.1. By continuing to use the functions of the BCPay Payment System, you express your free, specific, knowledgeable and unequivocal manifestation of will that you are aware of the processing of your personal data under this Privacy Policy and that you have been properly instructed and informed about the processing of your personal data.

4.2. We are authorised to unilaterally change this Privacy Policy in accordance with the applicable legislation and you agree with this authorisation.

4.3. If we change the Privacy Policy, we are obliged to inform you about this change in advance in the form of an e-mail message that will contain a link to the new Privacy Policy, from where you can print them or save them in electronic form.

4.4. The Privacy Policy is issued in electronic form and is available on the website of Business Credit s.r.o..

4.5. The Privacy Policy takes effect on 24 February 2021.