

PRIVACY POLICY

of Wolves Match

§ 1. General provisions

1. Wolves Pack assures that he has been using his best efforts to process Personal Data with respect to the privacy of persons, whose data are processed and to highest standards of security of Personal Data processing. In particular, Wolves Pack assures that he has taken proper legal measures to ensure security of Personal Data.
2. Wolves Pack hereby represents that he is using technical and organisational means ensuring security of the processed Personal Data suitable for the level of risk and category of protected data, in particular, Wolves Pack protects the data against access by unauthorised persons, stealing of such data, processing of the personal data in violation of the act, as well as amendment, loss, damage or destruction of such personal data.
3. In the event of any questions about collection, use, and/or disclosure of User's personal data, User may contact Data Protection Officer of Wolves Den Sp. z o.o. - Damian Klimas, under the following e-mail address iod@wolvegate.com.

§ 2. Definitions

Any references in the Privacy Policy to:

- 1) **Wolves Pack** - shall mean Joint Controllers: **Wolves Den Sp. z o.o.**, al. Zwycięstwa 96/98, 81-451 Gdynia, NIP: PL5862296113, REGON: 361154829, registered in the National Court Register (KRS) by Gdańsk Północ Court under the following number: 0000551363 and **Bridge – East Capital Sp. z o.o.** w organizacji, company in the process of registration, ul. Rubinowa 8, Tyniec Mały, 55-040 Tyniec Mały, NIP: 8961588435. Wolves Pack shall also mean the Joint Controllers of Personal Data.
- 2) **Personal Data** - shall mean basic details of the User, including, but not limited to first name, surname, e-mail, telephone number, address; as well as other details necessary to organize the Service, allowing for determination of identity either directly or indirectly;
- 3) **Service** – Wolves Match Platform on which Users may establish contacts with other Users (Start-up, Investor, Corporate) and any other electronic services provided by the Controllers;
- 4) **Software** – shall mean Internet browsers that may be used by the User in order to browse the Site;
- 5) **Cookie files** (the so called cookies) – shall mean IT data, in particular text files, stored on the User's Device for the purpose of browsing websites on the Site;
- 6) **Personal Data Processing** – shall mean an operation or set of operations executed on personal data or sets of personal data in either automated or non-automated manner, such as gathering, recording, organising, ordering, storing, adapting or modifying, downloading, browsing, using, disclosing by transmission, disseminating or other sharing, matching or combining, deleting or destroying;
- 7) **Regulations** - shall mean the document specifying the types, scope and conditions for the Service, as well as the rights and obligations of both Wolves Pack and Users;
- 8) **Registration** - shall mean the process of registration carried out in accordance with the Terms of Use by the User through the Site in order to use the Service;
- 9) **Site** – shall mean the website at the following address: wolvesmatch.com
- 10) **Device** – shall mean the electronic device, through which the User gains access to the Site, in particular: PC computers, laptops, tablets, smartphones;

- 11) **User** - a person who gains access to the Service, who has a User Account, being a natural person with full legal capacity, a legal person or an unincorporated association granted legal capacity by the act, who uses the Website; The User may have one of the three statuses: Corporate, Investor or Start-up. A Start-up User looks for, as a rule, potential Investors and partners, presents his/her organisation in compliance with the Website criteria and makes a decision about the information he/she wishes to disclose. An Investor User may view contents made available by Start-up Users, look for a potential Start-up in which he/she would like to invest. A Corporate User may choose an investment and a partnership with a Start-up User;

§ 3. Personal Data Processing

1. Personal Data of Users shall be processed for the purposes of providing the Service, provision of electronic services on the Site, for marketing purposes and for the purpose of any possible financial settlements. The legal basis for the processing of data shall be as follows:
 - 1) necessity to perform the agreement, i.e. to provide the Service;
 - 2) legitimate interests of Joint Controllers in particular, such as creating a Wolves Match network, direct marketing of own products or services, sending a newsletter, securing evidence to protect against claims or establishing and pursuing claims for business activity, transferring personal data between Joint Controllers for internal purposes, evaluation of the quality of services, market research, statistical purposes, in particular to assess interest in the content we publish and improve the provided services. Personal data may be processed for direct marketing purposes until the objection to such processing is raised;
 - 3) protect the vital interests of the data subject – with regard to the sole request of that person, i.e. in the case of requesting a Service invitation for submission to a visa application;
 - 4) necessity to fulfill the legal obligation by Wolves Pack – issue of invoice and taxation;
 - 5) User's consent – i.e. in the case of the processing of Personal Data for marketing purposes following expiration of the legal relationship between the User and Wolves Pack as well as other scopes and cases specified each time in the content of the consent expressed by the Participant;
2. Providing Personal Data is voluntary, but necessary to Register for the Service. Failure to provide data may result in the inability to register for the Service.
3. The User may also give a separate consent to receive trade information from Wolves Pack. The User may revoke their consent to receive such information at any time.
4. Wolves Pack processes or may process the following User's Personal data that may be provided voluntarily by the User during Registration for the Service:
 - 1) first and last name,
 - 2) address of residence,
 - 3) age
 - 4) social website addresses,
 - 5) categories of activity in social media;
 - 6) electronic addresses;
5. Personal Data will be stored for the period necessary to achieve the above-mentioned purposes, i.e. provision of the Service, for the purpose of maintaining the Wolves Match network, and for direct marketing based on the legitimate interest of the Wolves Pack, as well as the period necessary to secure any claims in accordance with the limitation periods set out in the Civil Code.
6. The recipients of Personal Data are persons authorised by Wolves Pack to process data as part of their employment duties, subjects, from whom Wolves Pack orders services entailing the need to process data

(processing subjects). Personal Data may be made available to entities maintaining accounting for Wolves Pack, entities conducting business in the field of business processes, i.e. IT support, as well as investors and startups that are part of the Wolves Match network.

7. Due to the use of IT solutions provided by entities from the USA (such as gSuite and Hubspot), Wolves Pack may transfer Personal Data to the United States of America based on the EU-US Privacy Shield and Standard Contractual Clauses.
8. By accepting this Privacy Policy, the User acknowledges the processing of their Personal Data for advertising purposes, as well as for the purposes of market research and research on the behaviour and preferences of Users in order to improve the quality of services provided by Wolves Pack.
9. Wolves Pack hereby represents that he may use tools for the analysis of traffic on the Site, such as *Google Analytics* and similar.
10. Data mentioned in clause 8 above shall be used by Wolves Pack anonymously for the purposes related to market research and analysis of Internet traffic on the Site, for statistical purposes, in particular to evaluate the interest in the goods and content available on the Site, as well as to improve the content and services provided through the Site.
11. Wolves Pack has the right to provide User's details and information for the purposes of proceedings carried out by competent authorities, such as the Public Prosecutor's Office or a Court of law.
12. Following termination of the relationship between the User and Wolves Pack, Wolves Pack shall not process User's Personal Data except data that is:
 - 1) necessary for advertising purposes, as well as for the purposes of market research and research on the behaviour and preferences of Users in order to improve the quality of services provided by Wolves Pack;
 - 2) necessary to investigate into the circumstances of an unauthorised use of the Site;
 - 3) permitted to be processed on the basis of separate acts or a separate agreement.
13. Wolves Pack observes the following Personal Data processing principles:
 - 1) Wolves Pack records Personal Data only on data carriers that are protected against access by third parties;
 - 2) Wolves Pack supervises the security of Personal Data in his possession at all times in a manner that in particular ensures protection against access by unauthorised persons, damage, destruction or loss;
 - 3) Wolves Pack keeps Personal Data in confidence.
14. The User, whom Personal Data are processed, has the right to request Wolves Pack to provide the User with access to such data, as well as to correct, remove, limit the processing or object against the processing of their data pursuant to § 6 of this Policy.

§ 4. Cookie files

1. Wolves Pack uses *Cookie* files on the Site.
2. Two basic types of cookies are used by the Site:
 - 1) session cookies - these are temporary files stored on the User's Device until logging out, leaving the Site or closing the Software;
 - 2) permanent cookies - these are files stored on the User's Devices for a specific period determined in the parameters of *cookie* files or until deleted by the User.
3. All or some of the following types of *cookie* files can be used by the Site:

- 1) "necessary" cookies that enable the Users to use services offered by the Site,
 - 2) "performance" cookies used to gather information on the use of the Site's websites;
 - 3) "functional" cookies used to save the settings and customize the User's interface, such as language, font size or website layout;
 - 4) "advertising" cookies that provide the User with advertising content more suited to their interests.
4. *Cookie* files mentioned in clauses 2 and 3 of this section are used for the following purposes:
- 1) to adjust the content of the Site to the User's preferences and optimize the use of the Site; in particular, to recognize and display the Site on the User's Device adjusted to the User's individual preference;
 - 2) to create statistics that support the analysis of the Site use by the Users, which could be used to improve the Site's structure and content;
 - 3) maintaining the Site User's session (after logging in); thanks to this, the User does not have to enter their login and password on each sub-page of the Site and the products added to the basket once are saved.
5. The solutions used on the Site's website are safe for the Devices of Users using the website.

§ 5. Contact us

1. Wolves Pack collects and processes the subject's personal data with regard to using different forms of contact, like contact form or Chatbot (an information society service used to automation of contact the users of Messenger application connected to Wolves Pack profile on Facebook), in accordance with article 6 paragraph 1 letter b) of 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).
2. Subject's data processed with regard to contact Wolves Pack via chatbot are Facebook's (an online social service company based on 1601 Willow Road, Menlo Park, CA 94025, USA) user's Personal data that are in their profiles or are disclosed by the data subject. That data can be processed in compliance with the Facebook user's privacy settings. Moreover, Wolves Pack shall process Personal data with regard to contact Wolves Pack in other ways, like contact form, in particular name, surname and e-mail address.
3. Data subjects may exercise their rights regulated in § 5 of this Privacy policy.
4. Personal data mentioned in clauses 2 of this section are processed and storage no longer than it is necessary for preparation and presentation of the response to a request.

§ 6. Users' Rights

1. The User has the right to access their Personal Data and to correct them at any time.
2. The User can choose to what extent and at what time they want to use the Site and provide their personal details. If the User does not wish to leave their Personal Data in the Users' Database for any reason whatsoever, they have the right to request deletion of such data.
3. In the event of the processing of Personal Data for marketing purposes on the basis of the consent given, the person, to whom the Personal Data concerns, has the right to withdraw their consent at any time by a statement made in writing or sent by e-mail to Wolves Pack's address: iod@wolvesgate.com. Withdrawal of the consent does not affect the lawful Personal Data processing carried out on the basis of the consent before the withdrawal.
4. The User has the right to correct, supplement, update and request deletion of their Personal Data.

5. The User has the right to object to the processing of Personal Data based on goals resulting from legally justified interests pursued by Wolves Pack or a third party. Wolves Pack shall no longer be allowed to process such Personal Data, unless Wolves Pack demonstrates that there are important, legally justified reasons for the processing thereof, having priority over the interests, rights and freedoms of the User or the basis for determination, pursuit or defense of claims.
6. In order to correct, supplement, update, amend, delete data or object to the processing of their Personal Data, the User shall send a request to Wolves Pack e-mail address.
7. The User has the right to file a complaint at The President of the Office of the Personal Data Protection in the event Wolves Pack fails to process their Personal Data in accordance with the law.
8. The User can limit or prevent *cookie* files from accessing their Device. If the User chooses to use this feature, it will be possible to use the Site except some functionalities requiring *cookie* files.
9. The User of the Site can change cookie settings at any time. These settings may be changed in particular to disable automatic handling of cookies by the web browser or to inform the User every time cookies are saved on the Site User's device. Detailed information on the methods and options for handling *cookie* files are available in the Software settings.
10. The User may delete *cookie* files at any time using functions of the User's Internet browser.

§ 7. Final provisions

1. The Site may contain links to other websites. Such other websites are independent of Wolves Pack and are not supervised by Wolves Pack in any way. Those websites may have their own privacy policies and regulations. We recommend reading them.
2. Any questions and reservations concerning this Privacy Policy should be sent by e-mail to: contact@wolvesgate.com
3. Wolves Pack reserves the right to amend this Privacy Policy.
4. Users will be notified about any amendments to the Privacy Policy seven days in advance through the Site's home page and through the User's Account.