

PRIVACY POLICY

§1.

Introduction

This Privacy Policy sets out the rules for the collection, processing, and use of personal data of users of the GTRADX website (hereinafter "GTRADX").

We assure you that users' personal data is treated with the utmost care and in accordance with applicable law, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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").

§2.

Personal data controller

The controller of the personal data of Portal users is GTRADX sp. z o.o., with its registered office in Krzczyn Wielki, entered in the Register of Entrepreneurs under KRS number 0001205160, NIP: 692-254-74-19, REGON 543238445 (hereinafter referred to as the "Controller"). The Administrator can be contacted at the following e-mail address: contact@gtradx.com.

§3.

Types of personal data collected

The portal collects the following categories of personal data:

1. identification data - first name, last name, PESEL [Personal Identification Number], company name, NIP [Tax Identification Number], registered office address, correspondence address,
2. contact details – email address, telephone number,
3. transaction data - information about purchase/sale offers, transaction history, payments,
4. technical data - IP address, login details, browser type and version, time zone and location settings, browser plug-in types and versions, operating system and platform, and other technologies on the devices from which the user accesses the Portal.

§4.

Purpose and legal basis for the processing of personal data

Users' personal data is processed for the following purposes and on the following legal bases:

1. provision of electronic services - to enable users to use the functionality of the Portal, including registration and maintenance of the User Account, data verification, submission of offers, communication with the Administrator and other users. The legal basis is the necessity of processing for the performance of the contract (Article 6(1)(b) of the GDPR),

2. customer service - to provide technical support, respond to inquiries, and provide expert and legal advice. The legal basis is the necessity of processing for the performance of a contract (Article 6(1)(b) of the GDPR) and the legitimate interest of the Administrator (Article 6(1)(f) of the GDPR),
3. analysis and statistics – for the purpose of monitoring and analyzing the use of the Portal, improving its functionality and optimizing the offer. Analysis and statistics are performed using cookies (GA4), which are activated only after the User expresses consent in the Cookie Banner. The legal basis is the User's consent (Article 6(1)(a) of the GDPR),
4. compliance with legal obligations - in order to meet the requirements of legal regulations, e.g. tax, accounting, anti-money laundering and terrorist financing, verification of international sanctions lists. The legal basis is the necessity of processing to fulfill the legal obligation incumbent on the Administrator (Article 6(1)(c) of the GDPR),
5. pursuing and defending claims - in order to establish, pursue or defend claims. The legal basis is the legitimate interest of the Controller (Article 6(1)(f) of the GDPR).

§5.

Sharing personal data

Users' personal data may be disclosed to the following categories of recipients:

- processors – providers of IT, accounting, legal, and analytical services (including Google Ireland Limited for Google Analytics and Google Search Console services) who process data on behalf of GTRADX,
- other Portal users - to the extent necessary to complete transactions (e.g., seller/buyer contact details),
- public authorities - where the obligation to disclose data arises from legal provisions,
- business partners - if the user has given their consent.

Transfer of data outside the EEA

In connection with the use of tools such as Google Analytics, User personal data may be transferred to third countries outside the European Economic Area (EEA), specifically to the USA. In such cases, the Controller ensures an adequate level of protection for the data by applying appropriate legal safeguards, such as Standard Contractual Clauses (SCCs) approved by the European Commission.

§6.

Period of storage of personal data

1. Personal data will be stored for the period necessary to achieve the purposes for which it was collected, i.e. for no longer than is necessary for the purposes for which it is processed (Article 5(1)(e) of the GDPR).
2. Additionally, in the case of fulfilling legal obligations (Article 6(1)(c) of the GDPR), i.e.:
 - tax and accounting obligations – 5 years from the end of the calendar year in which the tax payment deadline expired,

- anti-money laundering and counter-terrorist financing (AML/CFT) obligations – 5 years from the date of termination of the business relationship with the customer or from the date of the occasional transaction (Act on Counteracting Money Laundering and Terrorist Financing),
 - resulting from the verification of sanctions lists – data storage for the period necessary to demonstrate due diligence and compliance with international and national regulations,
 - in the scope of pursuing and defending claims – (Article 6(1)(f) of the GDPR) data is stored for the entire period during which claims are pursued or defended, which includes the potential duration of court and enforcement proceedings, as well as periods during which appeals may be lodged.
3. After the expiry of the period of storage of personal data specified for a given purpose of processing, the Data Controller shall immediately take steps to terminate their processing for that purpose. Personal data are then:
- permanently deleted from the systems in a manner that prevents its recovery or identification of the data subject,
 - anonymized if further processing is necessary for statistical, analytical, or archival purposes exclusively in the public interest in a manner that prevents the identification of a natural person.

§7.

User rights

Every user has the right to:

1. access their data - obtain information about the data being processed and a copy of the data,
2. rectify data - request the correction of incorrect data or the completion of incomplete data,
3. erase data ("right to be forgotten") - request the erasure of data if there is no legal basis for further processing,
4. restrict processing - request the restriction of data processing in certain situations,
5. data portability - to receive data in a structured, commonly used, machine-readable format and to send it to another controller,
6. objection - to object to the processing of data based on the legitimate interest of the Controller,
7. withdrawal of consent - withdrawal of consent to data processing at any time, without affecting the lawfulness of processing based on consent before its withdrawal,
8. lodge a complaint with a supervisory authority - lodge a complaint with the President of the Personal Data Protection Office if the user considers that the processing of their personal data violates the provisions of the GDPR.

§8.

Security measures

GTRADX uses appropriate technical and organizational measures to ensure the protection of personal data against unauthorized access, loss, destruction, or damage.

§9.

Cookie policy

1. The www.gtradx.com website uses cookies and similar technologies in order to ensure the correct operation of the Platform and – only after obtaining the user’s explicit consent – for analytical and statistical purposes.
2. Cookies are small text files stored on the user’s device. Some cookies are essential for the functioning of the website, while others are optional and require the user’s consent collected through a Cookie Banner displayed on the first visit.
3. The Controller uses the following categories of cookies:
 1. **Essential cookies (no consent required):** These cookies are necessary for the proper, secure and uninterrupted functioning of the Platform. In particular, they enable: a) maintaining user login sessions, b) enabling registration and access to the dashboard, c) protecting forms and preventing misuse, d) preventing system overload and ensuring service stability, e) saving selected interface and theme preferences. Essential cookies do not require user consent.
 2. **Analytical cookies (Google Analytics 4 – consent required):** These cookies are activated only after the user clicks the “Initialize” button in the Cookie Banner. Analytical cookies collect statistical data on how users interact with the Platform, including: a) visited pages and navigation paths, b) type of device, operating system and browser version, c) approximate geolocation (city/region), d) interactions with listings, marketplace components and dashboard features. Analytical cookies are used exclusively to improve the performance, security, business logic and UX of the Platform. Google Analytics 4 uses IP anonymization by default. Data collected using analytical cookies may be transferred to countries outside the EEA, including the United States, under Standard Contractual Clauses (SCCs).
4. Cookie storage periods:
 - a) essential cookies — for the time necessary to maintain the technical operation of the Platform and user session,
 - b) analytical cookies — in accordance with the retention settings of Google Analytics 4 (14 months), unless the user deletes cookies earlier,
 - c) cookie storing the consent decision — the file `gtradx_cookie_consent` indicating “accepted” or “rejected”, stored for 180 days.
5. Managing cookie preferences:

The user may at any time: a) accept analytical cookies, b) reject analytical cookies and continue to use the Platform without limitations, c) change their previous decision by clicking the “Cookie settings” button available on the website, d) delete cookies using

browser settings. Analytical cookies will not be activated without the user's explicit consent.

§10.

Consent during registration and contact forms

1. When providing personal data through the registration forms or contact forms, the user must accept the Privacy Policy, which constitutes a legally valid consent to the processing of personal data pursuant to Article 6(1)(a) GDPR.
2. This consent is separate from the consent for analytical cookies collected via the Cookie Banner.
3. Submitting the form without accepting the Privacy Policy is not possible.

§11.

Changes to the Privacy Policy

GTRADX reserves the right to make changes to this Privacy Policy. Users will be informed of any changes by the publication of a new version of the Privacy Policy on the Portal website. The changes come into force on the date of their publication.

§12.

MOBILE APPLICATION PRIVACY ADDENDUM

1. **Mobile Device Permissions:** When using the GTradX mobile application, the User may be prompted to grant access to specific device features:
 - a) Camera and Photo Library: Required strictly for uploading verification documents or adding photos to marketplace offers. Images are only accessed when explicitly selected by the User.
 - b) Push Notifications: If permitted by the User, the app collects device tokens to send real-time alerts regarding Deal Room messages and transaction statuses.
2. **UGC Moderation Data:** To ensure a safe environment (in compliance with Apple App Store and Google Play guidelines), GTradX processes data related to user moderation. This includes:
 - a) Reports: When a User reports content or another account, we collect the object ID, the reason for the report, additional details provided, and the identifiers of both the reporting and reported parties.
 - b) Block Lists: We process and store relationship data indicating which users have blocked other entities to enforce these restrictions across the platform.
3. **In-App Account Deletion & Data Retention:**
 - a) Users can request the permanent deletion of their account via the mobile application. Upon successful verification (password and confirmation phrase), the User's access token is invalidated, and the profile is removed.
 - b) Retention of Transactional Data: Even after an in-app account deletion request, certain personal and transactional data (such as VAT IDs, transaction history, invoices, and AML verification records) will be retained for up to 5 years (or as otherwise required by law) to comply with tax, accounting, and anti-money laundering (AML/CFT) obligations, as stipulated in §6 of this Privacy Policy.