



PRIVACY AND COOKIE POLICY

Effective Date: September 27th, 2021
Latest Update: November 5th, 2021

BYRSSA Fintech Markets ("Byrssa", "we", "us") are committed to protecting and respecting your privacy.

This Privacy and Cookie Policy ("the policy") applies to the website www.byrssa.io owned and operated by Byrssa Ventures s.r.o., CZ Prague (acting as its data controller). The policy describes how Byrssa collects and uses the personal data you provide on Byrssa.io. It also describes the choices available to you regarding our use of your personal data and how you can access and update this information.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you that you provided us with:

- Information provided about you by filling in information on the Byrssa website. This includes company contact information such as name, email address, mailing address, phone number, financial information such as bank account numbers, VAT number, as well as personal information such as user name, account number, password, date of birth, and preferences information such as favourites lists, transaction history, marketing preferences. If you list your company with us, we may ask for information about your business such as company name, company size, business type and personal data such as a professional profile.
- Information that you provide to us when you write to us (including by email).
- Information that you provide to us when we speak to you by telephone. We may make and keep a record of the information you share with us.
- Information that you provide to us by completing surveys, especially validations carried out by implemented internal calculations (risk report/valuation/readiness report e.g.)
- Information obtained by us from third parties in accordance with this Privacy Policy.

As is true of most web sites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information, to analyze trends, to administer Byrssa website, to track users' movements around Byrssa website and to gather demographic information about our user base as a whole.

USES MADE OF THE INFORMATION

We use information gathered about you in the following ways:

- To ensure that content from the Byrssa website is presented in the most effective manner for you and for your computer. This is in our legitimate business interests.
- To provide you with information, products or services that may be of interest to you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from (i) legal obligations and/or (ii) any contracts entered into between you and us to provide information, products or services that you have requested and notify you about changes to services.

If you are an existing customer/member, we may contact you by electronic means (fax, email or SMS) with information about services We will not otherwise contact you by electronic means to provide you with information about services which may be of interest to you, unless you have consented to this.

If you do not want us to use your data in one or more of the ways mentioned above, please let us know by contacting us at info@byrssa.io.

LEGAL BASIS FOR PROCESSING (for EEA users)

If you are an individual in the European Area (EEA), we collect and process information about you only where we have legal basis for doing so under applicable EU laws. The legal basis depends on the services you use and how you use them. This means we collect and use information only where:

- we need it to provide you the services, including the provision of customer support and the protection of the safety and security of the services
- it satisfies a legitimate interest (which is not overridden by your data protection interests), such as research and development purposes, to market and promote the services and to protect our legal rights and interests
- you give us consent to do so for a specific purpose
- we need to process your data to comply with a legal obligation.

DISCLOSURE OF YOUR INFORMATION

We will share your personal data with third parties only in the ways that are described in the policy. We do not sell your personal data to third parties. We may disclose your personal data to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

In addition to the above, we may disclose your personal data to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. You will be notified via email and/or prominent notice on the Byrssa website of any change in ownership or uses of your personal data, as well as any choices you may have regarding your personal data.
- If Byrssa or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are, or believe in good faith that we are, under a duty to disclose or share your personal data in order to comply with any legal obligation; or permitted by law in order to enforce or apply our Terms and Conditions, or other agreements; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- If you have registered in order to participate in an investment on byrssa.io or one of its clients running byrssa.io in a white-label relationship, your personal data may be disclosed to the company (or the company's professional representatives) that you have invested or applied to invest in.

YOUR RIGHTS

You have the right to access information that is held about you. To protect your privacy and security, we'll take reasonable steps to verify your identity before providing copies of any relevant data or materials.

You may be entitled to ask us:

- for a copy of information you stored on the Byrssa website
- to correct or erase information you stored on the Byrssa website
- to restrict or stop the processing of information you stored on the Byrssa website
- to transfer some of the given information to other organizations
- to withdraw the permission to give consent that was earlier given to Byrssa.

These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your data. In some instances, this may mean that we are able to retain data even if you withdraw your consent.

Where we require information to comply with legal or contractual obligations, then provision of such data is mandatory: if such information is not provided, we will not be

able to meet obligations placed on us or manage your transactions on the Byrssa website. In all other cases, provision of requested information is optional.

We hope that we can satisfy queries you may have about the way we process your information and resolve any complaints you may have. You are entitled to complain directly to the relevant data protection authority but we encourage you to come to us first to solve any issue.

How to exercise your rights:

You can correct, change, or delete your information in your profile. You can stop receiving our newsletters or marketing emails by following the unsubscribe instructions included in these emails or accessing the email preferences in your account settings page. Alternatively, or to access any of the other above rights, you can email our Customer Support at join@byrssa.io or by contacting us via telephone or postal mail at the contact information listed below.

HOW LONG WE RETAIN YOUR INFORMATION

We will retain your information for as long as your account is active or as needed to provide you with services. We will retain and use your information as long as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements, which in some cases is involving the collection and processing of financial data. This may require a retention period of 7 years (or longer if required by law).

COOKIES AND TRACKING

Technologies such as: cookies, beacons, tags and scripts are used by Byrssa and our partners, including analytics service providers and/or business process service providers. These technologies are used for analyzing trends, administering the Byrssa website, tracking users' movements around the Byrssa website and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We also use cookies to estimate our audience size and usage pattern, to store information about your preferences, and thus allow us to customize the Byrssa website to your individual interests, to speed up your searches, and to recognize you when returning to the Byrssa website. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use Byrssa website, but your ability to use some features or areas of Byrssa website may be limited.

HOW WE STORE, PROCESS AND SECURE YOUR INFORMATION

The data that we collect from you may be transferred to, and stored at, a destination inside or outside the European Economic Area ("EEA"). It may also be processed by staff operating inside or outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your orders, the processing of your payment details and the provision of support services. Access to your information is limited to those who have a need to manage it. Where your information is transferred from the EEA to a country that is not subject to an adequacy decision by the EU Commission, we will seek to ensure that it is

adequately protected by (i) ensuring that EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules are in place or (ii) relying on derogations (e.g. contractual necessity). A copy of the relevant mechanism can be provided for your review on request, using the contact details provided below.

SECURITY

All information you provide to us via email or via the Byrssa website is stored on our secure servers.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Byrssa website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

The security of your personal data is important to us. When you enter sensitive information (such as bank account information) on our order forms, we encrypt the transmission of that information using secure socket layer technology (SSL).

We follow generally accepted standards to protect the personal data submitted to us, both during transmission and once we have received it. However, no method of transmission via the internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. If you have any questions about security on Byrssa website, you can contact us at info@byrssa.io.

ADDITIONAL PRIVACY INFORMATION

Blog / Discussions

The Byrssa website may offer publicly accessible community discussions. You should be aware that any information you provide there may be read, collected, and used by others who access them. To request removal of your personal data from our community discussions, contact us at info@byrssa.io. In some cases, we may not be able to remove your personal data, in which case we will let you know if we are unable to do so and why.

Referrals

If you choose to use our referral service to tell a contact about Byrssa website, we will ask you for your contacts' name and email address. You must have consent from your contact to provide this information to us. We will automatically send your contact a one-time email inviting him or her to visit the site. We store this information for the sole purpose of sending this one-time email and the tracking the success of our referral program.

Your contact may contact us at info@byrssa.io to request that we remove this information from our database.

Single Sign-On

You can log in to the Byrssa website using the sign-in service such as LinkedIn, Facebook and Google. These services will authenticate your identity and provide you the option to share certain personal data with us such as your name and email

address to pre-populate our sign-up form. Services like LinkedIn, Facebook and Google may give you the option to post information about your activities on the Byrssa website to your profile page to share with others within your network.

CHANGES TO THE PRIVACY AND COOKIE POLICY

We may update the policy to reflect changes to our information practices. If we make any changes, we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on the Byrssa website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to:

Byrssa Ventures
Pernerova 675/51, Karlin
CZ 186 00 Prague 8
Czech Republic
Email: join@byrssa.io

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