

## Privacy Policy of the BeMyBond platform

### 1. GENERAL PROVISIONS

- 1.1. This Personal Data Processing Policy (hereinafter referred to as the **Privacy Policy**) sets out the terms and conditions for the processing of your personal data when you use our managed website [www.bemybond.com](http://www.bemybond.com) (hereinafter referred to as the **Website**) and/or Crowdfunding services we provide. The Privacy Policy is intended for individuals who are interested in our Crowdfunding services, potential Investors, Investors, representatives of Project owners, individuals who visit the Website, and those who provide their personal data for the purposes of using or having used the Company's Crowdfunding services or for other purposes.
- 1.2. The controller of your personal data is Perfect Sunday, UAB, legal entity code: 306085042, registered office address: A. Goštauto srt. 40B, LT-03163 Vilnius (hereinafter referred to as the **Company**).
- 1.3. In processing personal data, the Company complies with 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 the **GDPR**), as well as with the requirements of national law.
- 1.4. In this Privacy Policy, capitalized terms have the same meanings as defined in the Agreement for the use of the Crowdfunding platform BeMyBond. Other terms used in the Privacy Policy are understood as defined in the laws of the Republic of Lithuania on crowdfunding, and other relevant legal acts, unless otherwise specified in the Privacy Policy.

### 2. PURPOSES OF DATA PROCESSING, LEGAL BASIS, TIME LIMITS

- 2.1. We process only those personal data of yours that are necessary to achieve the defined purposes. The Company processes this personal data on the legal grounds and within the time limits specified:

| Purposes of data processing | Processed data                                                                                                                                                                                                                                                                                                                                       | Legal basis                                                                             | Time limits                                                                                                                                                                                                                                                                                                                                                                                                     |
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| Identification              | For example, name, surname, personal identification number, date of birth, details of identity document (copy), citizenship, address, phone number, email address, bank account number, employment information, identity data of managers, shareholders, beneficiaries, representatives, contact information (in case of legal entities), signature. | Legal obligation;<br><br>Pre-contractual relations;<br><br>Performance of the contract. | The data is stored from the initiation of business relations and for 10 years after the termination of business relations with the Client.<br><br>If the service is refused, the data is stored for 1 year from the date of refusal to provide the service.<br><br>If the service is refused due to anti-money laundering requirements, the data is stored for 8 months from the moment of refusal. The storage |

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|                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                       | period may be additionally extended for up to 2 years upon a justified directive from a competent authority.                                                                                                                                                                                                                                                                                                                                                                                                   |
| Correspondence regarding business relations with the Client            | For example, name, surname, email address, phone number, records of correspondence with the Client, content                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Legal obligation;<br><br>Performance of the contract. | The data is stored from the initiation of business relations and for 5 years after the termination of business relations with the Client.<br><br>The storage period may be additionally extended for up to 2 years upon justified instruction from the competent authority.                                                                                                                                                                                                                                    |
| Assessment of applications / creditworthiness                          | For example, name and surname of the Project owner's manager or authorized person, their personal identification number, name and surname of shareholders, their personal identification numbers, profit and loss statement data, balance sheet data, financial obligations, credit and payment history, and other information necessary for assessing creditworthiness and risk.                                                                                                                                                                                                                                                                                                                                                       | Legal obligation;<br><br>Legitimate interest.         | The data is stored from the date of application submission and for 10 years after the termination of business relations with the Client.<br><br>If the service is refused, the data is kept for 1 year from the date of refusal to provide the service.                                                                                                                                                                                                                                                        |
| Prevention of money laundering and other criminal activities           | For example, name, surname, personal identification number, address, citizenship, contact details, sources of income, assets, investment amount, investment object, participation in politics or association with politically exposed persons, beneficiaries, risk category, and other data necessary to achieve this purpose.                                                                                                                                                                                                                                                                                                                                                                                                          | Legal obligation;<br><br>Legitimate interest.         | The data is stored from the initiation of business relations and for 10 years after the termination of business relations with the Client.<br><br>If the service is refused due to anti-money laundering requirements, the data is stored for 8 years from the moment of refusal. The storage period may be extended for up to 2 years upon justified instruction from the competent authority.                                                                                                                |
| Assessment of the reliability of Project owners                        | For example, data regarding an individual's legality (illegality) related to national regulations in commercial law, bankruptcy and restructuring law, financial services law, anti-money laundering law, EU, national, and international sanctions, combating fraud or data from registers of wanted individuals, data on whether the individual is established in a country or territory considered non-cooperative according to EU policy, a high-risk country or territory, other significant information for reputation assessment, such as if the individual has been a director of a legal entity for which the right to engage in financial services provision has been revoked or for a gross violation of the law, and so on. | Legal obligation.                                     | The data is stored from the initiation of business relations and for 10 years after the termination of business relations with the Client.<br><br>If the service is refused, the data is kept for 1 year from the date of refusal to provide the service.<br><br>If the service is refused due to anti-money laundering requirements, the data is stored for 8 years from the moment of refusal. The storage period may be extended for up to 2 years upon justified instruction from the competent authority. |
| Conclusion and execution of contracts with the Client, debt management | For example, name, surname, personal identification number, address, phone number, email address (in the case of a legal entity – identity data and contact details of director, shareholders, beneficiaries,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Performance of the contract;<br><br>Legal obligation; | The data is stored from the initiation of business relations and for 10 years after the termination of business relations with the Client.                                                                                                                                                                                                                                                                                                                                                                     |

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|                                                                                                                                                                                                       | representative), signature, payment information, bank account details, other data necessary for the performance of the Agreement, as well as data related to the circumstances of debt formation.                                                                                                                                                                                                        | Legitimate interest.                                                      |                                                                                                                                                                           |
| Payment processing                                                                                                                                                                                    | Data enabling identification of the individual (e.g., name, surname, personal identification number, date of birth),<br><br>Contact information (phone number, email address, address),<br><br>Information about your payments to us and your bank account details (data confirming monetary operation or transaction, as well as data related to the execution of monetary operations or transactions). | Legal obligation.                                                         | 10 years after the payment execution.                                                                                                                                     |
| Submission of reports to supervisory authorities                                                                                                                                                      | Project owner's details, amount raised.                                                                                                                                                                                                                                                                                                                                                                  | Legal obligation.                                                         | 10 years after the submission of the report.                                                                                                                              |
| Handling of complaints and requests                                                                                                                                                                   | For example, name, surname, contact details, date and time of complaint / request submission, date and time of response, content, records of correspondence with the Client.                                                                                                                                                                                                                             | Legal obligation;<br><br>Performance of the contract.                     | 3 years from the examination of the complaint or request.                                                                                                                 |
| Ensuring smooth operation of the Website                                                                                                                                                              | For example, IP address, information about the browser and device, email address.                                                                                                                                                                                                                                                                                                                        | Consent;<br><br>Legitimate interest.                                      | According to allowed / selected cookies.                                                                                                                                  |
| Registration of Client account                                                                                                                                                                        | When registering on the Website, the following data is collected: if a natural person is registering – name, surname, email address, phone number. In the case of registration of a legal entity – name, code, email address, phone number.                                                                                                                                                              | Performance of the contract.                                              | 10 years from the end of the business relationship with the Client.<br><br>If the Contract was not concluded, the account will be active for 2 years from the last login. |
| Direct marketing                                                                                                                                                                                      | Email address, phone number, address.                                                                                                                                                                                                                                                                                                                                                                    | Consent /<br>No objection and our legitimate interest (existing clients). | Until the date of declaration of the Client's objection to processing data for this purpose                                                                               |
| Compliance with legal obligations applicable to the Company, including registration and processing of shareholder data, share accounting, fulfillment of tax and other applicable obligations to them | Name, surname, personal identification number, date of birth, address, phone number, email address.                                                                                                                                                                                                                                                                                                      | Legal obligation.                                                         | As long as it is necessary according to legal requirements.                                                                                                               |

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| Receipt of services | Name, surname, personal identification number, address, represented person (relationship with the represented person), position, workplace, phone number, email address. | Legitimate interest. | During the performance of the Contract and for 10 years after its termination. |
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### 3. SOURCES OF PERSONAL DATA

- 3.1. Depending on the purpose of data processing, we may obtain your personal data from various sources:
  - 3.1.1. From you, when you inquire about our Services or express interest in them;
  - 3.1.2. If you are designated as the Client's contact person or representative (director, shareholder, payer, guarantor, or authorized representative), we obtain data from the Client;
  - 3.1.3. From third parties we contact for information necessary to assess your solvency, credit history, and the origin of funds, such as credit bureaus and other financial institutions or their branches, state institutions, registers, debtor databases, and other partners we collaborate with, or third-party service providers capable of providing the required information.

### 4. RECIPIENTS OF PERSONAL DATA

- 4.1. Depending on the basis for data provision and ensuring the security of the transmitted data, we may provide your personal data to the following entities:
  - 4.1.1. State and other institutions (e.g., State Tax Inspectorate, Bank of Lithuania, Financial Crime Investigation Service, etc.), as well as law enforcement agencies, bailiffs, tax administrators, supervisory authorities, and third parties managing various state and commercial registers (e.g., Creditinfo Lietuva UAB, Scorify UAB, etc.), lawyers, legal consultants, auditors, consultants;
  - 4.1.2. Financial intermediaries and other third parties involved in providing Services and executing and/or performing the Agreement;
  - 4.1.3. Service providers providing anti-money laundering and fraud detection tools, customer identity verification tools, general server hosting services, data and cyber security services, email and content transmission tools, postal, marketing, accounting, securities accounting and safekeeping, legal, audit, IT, web analytics, session recording, and online marketing services, as well as other services that may reasonably be required by us;
  - 4.1.4. Debt collection companies or other legal entities, based on assigned rights, courts, out-of-court dispute resolution institutions, or insolvency administrators, as well as peer-to-peer lending platforms, crowdfunding platforms.
- 4.2. If the Client delays in fulfilling its contractual obligations, as provided in the Company's debt collection policy, the Company has the right to provide the Client's identity, contact details, and credit history to the Credit bureau Creditinfo Lietuva UAB (company code: 111689163, address: A. Goštauto srt. 40A, LT-01112 Vilnius, Lithuania, [www.manocreditinfo.lt](http://www.manocreditinfo.lt), tel.: (8 5) 2394131). The Credit bureau processes and provides your information to third parties (financial institutions, telecommunications companies, insurers, electricity and utility service providers, trading companies, etc.) for legitimate interests and purposes – to assess creditworthiness and manage indebtedness. When assessing creditworthiness, automatic assessment of personal characteristics (**profiling**) is performed, which may affect the Client's ability to enter into transactions in the future. Automatic assessment helps to lend responsibly by evaluating

information provided by the person, credit history, public information, etc. The methods of automatic assessment are regularly reviewed to ensure their fairness, effectiveness, and impartiality. Credit history data is processed for 10 years after the performance of obligations. You can familiarize yourself with your credit history by contacting the Credit bureau directly or using the Finpass mobile app. You also have the right to request correction or deletion, or restriction of data processing, and the right to object to data processing, demand human intervention in automatic decision-making, express your opinion and challenge the decision, as well as the right to data portability. For more information about the exercise of these rights and limitations, automatic assessment of personal characteristics (profiling), please visit [www.manocreditinfo.it](http://www.manocreditinfo.it). If your rights are violated, you can contact the data protection officer by email [duomenu.apsauga@creditinfo.it](mailto:duomenu.apsauga@creditinfo.it) or by phone as provided above, or file a complaint with the State Data Protection Inspectorate or the court.

- 4.3. In certain cases, we have a legal obligation to share your information with third parties to comply with legal requirements or requests, as well as to protect our or third-party legal interests. As far as applicable laws allow, we will also disclose your information to the following third parties: prospective or actual buyers acquiring the Company or its business, or part thereof; third party if a company merger, reorganization, restructuring, bankruptcy, or sale of assets or part thereof is taking place. In carrying out such operations, your information is transferred as part of the transferred assets.
- 4.4. When transferring your personal data to service providers, we comply with the requirements of applicable personal data protection laws. If the service provider acts as our data processor, it is allowed to process your data only in accordance with our instructions and a written agreement, and your data cannot be used for other purposes.

## **5. TRANSFER OF PERSONAL DATA TO THIRD PARTIES**

- 5.1. Typically, your personal data is processed within the European Union/European Economic Area (EU/EEA) territory, but in cases established by law, they may be transferred and processed outside the EU/EEA while adhering to all security requirements. The Company will not transfer personal data you provided to countries outside the EU/EEA without clearly informing you about this data transfer.

## **6. PROFILING AND AUTOMATED DECISION MAKING**

- 6.1. Profiling is the assessment of Clients based on certain parameters, such as economic status, personal priorities, interests, behavior, etc., in order to assign Clients to one of our predefined Client categories. Automated decision making is the ability to make decisions using technological, automated means, using data provided by the Client or information obtained during profiling.
- 6.2. We may conduct profiling and automated decision making in order to process your request for our services, assess your creditworthiness and the risks associated with you, determine our ability to provide our services to you, establish the maximum loan / investment amount, assess fraud risk and prevent it, as well as to fulfill our obligation to comply with anti-money laundering and terrorist financing prevention and sanctions requirements.
- 6.3. When making a decision to refuse to provide you with services, we do not use automated means, meaning that our employees are involved in making this decision. In order to avoid evaluation errors and inaccuracies, we regularly review the algorithms used and terms of service. You have



the right to request that your application be processed by a natural person rather than an automated system; however, upon performing a secondary evaluation of the application, it cannot be guaranteed that a different result will be obtained.

- 6.4. We may also conduct profiling and automated decision making in order to offer you a more suitable service, personalized marketing and commercial offers based on personal needs, including discounts and special conditions, as well as to conduct client analysis.
- 6.5. Profiling and automated decision making are carried out based on the following legal grounds:
  - 6.5.1. Our legal obligation to assess Clients' solvency and comply with anti-money laundering and terrorist financing and sanctions requirements;
  - 6.5.2. To enter into a Service provision agreement and take pre-contractual measures, as well as to ensure a faster and more efficient contract conclusion process;
  - 6.5.3. With your consent or our legitimate interest to prevent fraud risk and offer you more suitable products, communication, and proposals.

## **7. PERSONAL DATA SECURITY**

- 7.1. Your personal data is protected against loss, unauthorized use, or unlawful alteration. We are consistently taking a close interest in the best practices and technical measures of data protection, and we have implemented robust physical and technical measures to protect all the information relating to you.
- 7.2. Unfortunately, transmitting information over the internet is not entirely secure. While we make every effort to protect your personal data, we cannot guarantee the complete security of data when you transmit it to a website. Therefore, you assume the risk associated with data transmission.
- 7.3. If unlikely circumstances arise and we become aware of a security breach of your personal data, which may pose a significant threat to your rights or freedoms, we will immediately inform you as soon as we learn about it and determine what information was accessed.

## **8. THIRD-PARTY INFORMATION**

- 8.1. The Company's website may contain links to third-party websites and social networks. The Company is not responsible for the content of information provided by third parties, their privacy policies, and data security measures. Third parties may process personal data under conditions different from those of the Company. Therefore, to familiarize yourself with their personal data processing (privacy policies), please contact them directly.

## **9. DATA SUBJECT RIGHTS**

- 9.1. You have the following rights regarding your personal data:
  - 9.1.1. To obtain information about whether the Company processes your personal data and, if so, to familiarize yourself with them;
  - 9.1.2. To request correction of your personal data if it is inaccurate, incomplete, or incorrect;
  - 9.1.3. To object to the processing of your personal data. This right does not apply if personal data is processed for legitimate reasons that override your interests;

- 9.1.4. To withdraw your consent, for example, for data processing for direct marketing purposes. The withdrawal of consent does not affect the lawfulness of data processing based on consent before its withdrawal;
- 9.1.5. To demand the deletion of your personal data when your personal data is processed with your consent (upon your withdrawal of consent), as well as if your personal data is no longer necessary for the purposes for which it was collected; if your personal data is processed unlawfully; or if your personal data must be deleted in accordance with a legal obligation.
- 9.1.6. To demand the transfer of your personal data that we have received from you in a machine-readable format for purposes of your consent or contract performance, when data is processed by automated means and when it is technically feasible to implement the requirement;
- 9.1.7. To restrict the processing of personal data, except for storage, when you contest the accuracy of the data (processing is restricted for a period during which the Company can verify the accuracy of personal data); personal data is processed without compliance with legal acts or requirements of the Privacy Policy, but you do not agree to the deletion of data; the Company no longer needs this data for the purposes for which it was collected, but you need the processed data to assert, exercise, or defend legal claims. The Company will inform you before lifting the restriction on processing your personal data.
- 9.1.8. To submit a complaint regarding the processing of personal data with the State Data Protection Inspectorate. You can find more information and contact details on the inspectorate's website (<https://vdai.lrv.lt/>). We aim to promptly and amicably resolve all disputes with you, so we **recommend that you first contact us by email at [info@bemybond.com](mailto:info@bemybond.com) in case of any uncertainties or specific issues and try to find an appropriate solution to the problem.**

## 10. PROCEDURE FOR EXAMINING DATA SUBJECT REQUESTS

- 10.1. You can submit requests related to the exercise of your rights to us in person, by mail, or by electronic means of communication. Upon receiving your request, we may ask you to provide identity documents, as well as any other additional and request-related information we may need.
- 10.2. Upon receiving your request, we will examine it no later than within 30 calendar days from the date of receipt of your request and all necessary documents required to provide a response, unless the complexity of the request requires us to extend this period to 2 months, in which case we will inform you accordingly.
- 10.3. We will provide a response to your request in the manner chosen in your request, except in cases where we cannot fulfill your request in this manner.

## 11. USE OF COOKIES

- 11.1. We collect information about you using cookies and similar technologies. Cookies are small files that are temporarily stored in your browser or on your device. Cookies are a common practice on websites that facilitate website usage.
- 11.2. You can find information about the cookies used on the website, their purpose, validity, and the data used in the Company's Cookie Policy, available on the website.
- 11.3. We use the information obtained through cookies to achieve the following goals:

- 11.3.1. To ensure the functionality of the website;
- 11.3.2. To improve and develop the website to better meet your needs;
- 11.3.3. For service development and website usage analysis;
- 11.3.4. For targeted marketing solution.
- 11.4. You can give consent to the use of cookies by clicking the "Agree" button in the cookie notice (banner) provided on the website. Without expressing consent, cookies will not be used on the website, except for essential (technical) cookies necessary for the operation of the website.
- 11.5. You can withdraw your consent to use cookies at any time. You can do this by changing your internet browser settings to refuse any cookies. How to do this depends on the operating system and internet browser you use. Detailed information about cookies, their use, and how to opt out can be found at <http://AllAboutCookies.org> or [http://google.com/privacy\\_ads.html](http://google.com/privacy_ads.html).
- 11.6. In some cases, especially when technical or functional cookies are disabled, refusing cookies or deleting them may slow down internet browsing speed, limit the operation of certain website functions, block access to the website, making website usage more difficult.

## **12. CHANGES TO THE PRIVACY POLICY**

- 12.1. We reserve the right to update and amend the Privacy Policy. We will notify you of any changes on our Website, so we recommend that you regularly review the current version of the Privacy Policy. In case of significant changes and/or need, we will notify you about them. The new terms of the Privacy Policy will be provided on the Company's Website, and in order to use the services we provide, you have to familiarize yourself with it.

## **13. CONTACT INFORMATION**

- 13.1. Data controller: UAB Perfect Sunday, company code: 306085042, address: A. Goštauto str. 40B, LT-03163 Vilnius.
- 13.2. You have the right to contact the Company to: ask questions, withdraw consents, submit requests regarding the exercise of data subject rights, and lodge complaints about the processing of personal data by sending them to the email address [info@bemybond.com](mailto:info@bemybond.com).