

OutperformMarket Privacy Policy

This document constitutes the privacy policy (the “**Privacy Policy**”) and sets out the scope, manner and general conditions for the processing of Users' personal data (as defined in accordance with the Terms and Conditions of the Stock Trade IQ Website (the “**Website**”).

Precise information about the Website's functions, method and scope of use is contained in the Terms and Conditions, which apply together with the Privacy Policy.

1. PERSONAL DATA ADMINISTRATOR

- 1.1 The Administrator of personal data is STOCKTRADEIQ sp. z o.o., with its registered office in Poznan (61-625), at the following address: Czarna Rola 30 Street , a company incorporated under the law of Poland, entered in the Register of Entrepreneurs under number 0001034119 and with tax identification number 9721339207 (“Administrator”);
- 1.2 To contact the Administrator, send a message by post to the address indicated in the preceding section or by e-mail to the e-mail address: support@stocktradeiq.com.

2. GENERAL TERMS AND CONDITIONS FOR THE PERSONAL DATA PROCESSING

- 2.1 In the Website, the processing of personal data shall be carried out in accordance with the provisions of the law and, in particular, in accordance 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 (hereinafter “GDPR”).
- 2.2 The processing concerns the data of visitors to the Website, in particular registered Users who provide the data voluntarily, and the consequence of failing to provide the data may be the inability to use certain functionalities of the Website.
- 2.3 The Administrator shall ensure that processing is carried out in a fair and transparent manner and that adequate security of personal data is provided, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, by means of appropriate technical or organisational measures. Personal data shall be collected in accordance with the principle of data minimisation, i.e. limited solely to the fulfilment of the specified purposes, and the retention period shall not be longer than necessary.
- 2.4 The Administrator shall not process personal data in a way that would involve making exclusively automated decisions about a User.
- 2.5 The Administrator may process personal data in an automated manner, including profiling, however, automated processing will not lead to decisions which have legal effect or similar material impact on the User's situation. Decisions will only relate to the priority of the information displayed, given the region from which the call originates. This information is collected from the IP address. The Administrator shall only use the IP address for the information and technical purposes indicated.
- 2.6 Users can visit the Website without prior registration and provision of personal data, but without registration some functionalities may be limited.
- 2.7 In order to access the full functionalities of the Website, the User shall register and log in to his/her account on the Website, using his/her e-mail address and password.
- 2.8 The User may register and log in to his/her account using the e-mail address and password assigned to other websites (Facebook and Google) (“Partner Websites”), which make this option available and have been functionally related to the Website. In this case, the User's data submitted to the Partner

Websites shall be treated as the data submitted by the User for registration on the Website. Administrator of Partner Websites receive information about setting up an account on the Website and may use this information in accordance with their policies – the Administrator of the Partner Websites are, respectively: Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (privacy policy: <https://www.facebook.com/about/privacy>) and Google Ireland Limited, Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland (privacy policy: <https://policies.google.com/privacy>).

- 2.9 The User Account holds information entered by the User, as well as the User's history of activities and actions undertaken on the Website. The User shall be obliged to keep his/her personal data up-to-date and not to share his/her access password.

3. GROUNDS AND DURATION OF PERSONAL DATA PROCESSING

- 3.1 Any processing of personal data that is linked to the use of the Website shall be carried out for specific, explicit and legitimate purposes, and the Administrator shall ensure that it does not collect or process personal data contrary to the purposes indicated below.
- 3.2 The performance of activities related to the conclusion and execution of the contract under the Terms and Conditions is carried out under Art. 6(1)(b) of the GDPR and, in particular, applies to:
- 3.2.1 providing services on the Website;
 - 3.2.2 contacting Users in relation to the services provided;
 - 3.2.3 ensuring traffic safety on the Website;

The period of processing for this purpose shall relate to the duration of the contract entered into under the Terms and Conditions.

- 3.3 The establishment of a business relationship, including the provision of answers to questions asked in relation to the contact of data subjects, shall take place under Art. 6(1)(f) of the GDPR in relation to the fulfilment of the Administrator's legitimate interests in responding to queries made. Personal data shall be processed until an effective objection to the processing has been made, but no longer than the last day of the calendar year following the expiry of 3 years after the Administrator's response.
- 3.4 Pursuing or securing possible claims and handling complaints shall take place under Art 6(1)(f) of the GDPR in relation to the fulfilment of the Administrator's legitimate interests concerning the protection of the rights of the Administrator and of the persons whose rights are affected, and the duration of the data processing shall refer to the limitation period of the relevant claim.
- 3.5 Marketing activities of the Controller's own or third-party's services shall be performed under Art. 6(1)(f) of the GDPR in connection with the fulfilment of the Administrator's legitimate interests consisting in taking care of the Administrator's interests and promoting the services on the Website. The duration of the processing of personal data, with regard to marketing activities, shall be until the withdrawal of consent to receive messages or information under the provisions of the Act on the Provision of Electronic Services or the Telecommunications Law.
- 3.6 Fulfilment of tax and accounting obligations shall be carried out under Art. 6(1)(c) of the GDPR in connection with the relevant tax and accounting regulations. The duration of data processing for this purpose shall be equal to the duration of the legal obligation incumbent on the Administrator.
- 3.7 Analytical and statistical activities shall be performed under Art. 6 (1) (f) of the GDPR, i.e. the Administrator's legitimate interest, which refers to the analysis of activity, the optimisation of the Website, as well as the creation of statistical models. The personal data shall be processed until the termination of the storage of the personal data in relation to the ongoing purpose of the processing or until an effective objection to the processing has been made, but no longer than until the last day of the calendar year following the expiry of 3 years after the termination of the Administrator's services.

4. RECIPIENTS OF PERSONAL DATA

- 4.1 Personal data may be forwarded to entities which are entitled to do so due to applicable laws, in particular competent authorities or state bodies.
- 4.2 Personal data may also be provided to trusted recipients, such as partners providing technical services related to the development or maintenance of IT systems and websites, including those related to hosting, analytics and statistics, user account management and IP address reading support.
- 4.3 If, in the course of cooperation with the above entities, the processing of personal data is entrusted, the Administrator shall have an appropriate entrustment agreement in place, which will comply with the requirements provided for by the legislation on the protection of personal data.
- 4.4 Personal data shall not be transferred to a third country/an international organisation. However, if this changes or is required, the transfer shall take place on the basis of an adequacy decision taken by the European Commission, or on the basis of standard contractual clauses in accordance with a decision of the European Commission, or on another legal basis, for example: the explicit consent of the data subject.

5. RIGHTS OF DATA SUBJECTS

- 5.1 The data subject may have the following rights in the cases specified by law:
 - 5.1.1 access to and obtaining copies of data;
 - 5.1.2 rectification of data;
 - 5.1.3 request to delete data;
 - 5.1.4 limitation of personal data processing;
 - 5.1.5 transfer of data;
 - 5.1.6 objection to the processing on the basis of the legitimate interest of the Administrator or to the processing for direct marketing purposes;
 - 5.1.7 the withdrawal of consent, if the processing is based on consent, which will not, however, affect the lawfulness of the previous processing of personal data;
 - 5.1.8 lodging a complaint to the President of the Office for Personal Data Protection (ul. Stawki 2, 00-193 Warsaw).
- 5.2 The exercise of the rights referred to in the section above is carried out by contacting the Controller in the manner indicated in section I.2 of the Privacy Policy.

6. FINAL PROVISIONS

To matters not covered by this Privacy Policy, the Terms and Conditions shall apply accordingly.