



*PU Group Limited
Company number 11080215
85 Great Portland Street, First Floor,
London, England, W1W 7LT*

PRIVACY POLICY OF SPOKO

1. PRELIMINARY PROVISIONS

The website spoko.app and Spoko Mobile App (hereinafter referred to as “The Platform”) are managed and provided by PU Group Limited.

Who is your data administrator?

Your data is administered by PU Group Limited (hereinafter referred to as “The Company”, The Company’s HQ address: 85 Great Portland Street, First floor, London, England, W1W7LT;

Tax Reference Number: 11080215

Email: legal@spoko.app

2. HOW DO WE PROCESS YOUR DATA?

Personal data is a kind of information that allows to identify you, ex: your name and surname, phone number, e-mail address. In case of legal entities it also includes names of members of the board, representing a given entity, date of legal representatives, data of employees who are also the contact person.

The following privacy policy regards personal data and other information we gather, regardless of it being acquired through the website, the app, social media, phone, text, email, in traditional mail and other correspondence or other sources.

We commit to protect the data that we process. With great care, we choose mechanisms of security adequate to identify risks. Detailed information on the subject can be found here.

We are obligated to use personal data in accordance with current regulations - especially in accordance with the April 27th Regulation of the European Parliament and of the Council (EU) 2016/679 on protection of physical persons in reference to personal data processing and in reference to the free movement of such data, and directive 95/46/WE (GDPR)

At the same time, we inform that using services, including downloading the app, is possible after reading this Privacy policy.

what kind of information do we gather and how do we use it,

how long do we store personal data,

what is the legal basis for personal data processing,

do we share the data with other entities,

what are your rights when it comes to your personal data.

What are the information we gather and how do we use it?

Financial services

Providing personal data to use services is voluntary, except when it is required by law. However, providing personal data is necessary to provide some services.

3. PERSONAL DATA PROCESSING, WHAT KIND OF DATA DO WE GATHER AND HOW DO WE USE IT

We gather personal data directly from you - it's the information you provide us with while using services. Setting up an account requires providing (a) username (user's e-mail), (b) password and (c) country of residence. We need that

information to make it possible for you to use your account. Account password is encrypted and is confidential, that's why you should not share it with anyone.

Using services requires providing additional personal data which include, among others, your name and surname, gender, PESEL, address information, type and number of id, payment card number or bank account number. You may also be asked to provide a copy of your id or other documents confirming your personal data.

4. PERSONAL DATA PROCESSING

We care about protecting personal data of third persons that you have provided us with, to provide our services, just as much as we do about protecting your personal data. Remember, fulfilment of your rights in regard to personal data cannot have a negative impact on the rights and freedoms of other persons, including those whose data you have provided.

We also process your personal data when you contact us, for example, through our Customer Service Department. It also pertains to data necessary to communicate with you, including providing you with answers to your questions and doubts. To do that, we use data provided by you in your account. Personal data processing is limited to information necessary to provide support.

Your personal data is used to:

- to perform obligations laid out in our contract with you,
- to provide specific services and their functionality,
- to provide status of performed services
- to perform legal obligations, arising from tax, accounting, countering money laundering and financing terrorism regulations,
- to provide support while providing service through Customer Service Department, as well as, to solve technical problems and other matters through the contact form,

- to contact you, including providing information about the changes made to our Rules and Policies,
- to provide electronic information about fees and Exchange Rates,
- to respond to claims regarding provided services,
- to conduct court proceedings and other proceedings in case claims arise,
- to settle services.
- **To send by electronic means (mail, push, sms, in app banners) commercial offers over telecommunication devices.**
- **To contact over the phone to present commercial offers.**

5. TYPES OF GATHERED DATA:

The Company gathers the following data:

(A) Identification information:

- 1) full names, middle names and surnames of the user and the beneficiary;
- 2) place of registration of the user (full address) and the beneficiary;
- 3) telephone number of the user and the beneficiary;
- 4) e-mail addresses of the user and the beneficiary;
- 5) information regarding the document confirming identity of the user;
- 6) date and place of birth of the user;
- 7) copy of the user's ID;
- 8) gender of the user;
- 9) citizenship of the user;
- 10) nationality of the user.

(B) Financial information:

- 1) full number of credit/debit card of the user and beneficiary

- 2) full number, validity and CCV2/CVV2 number of the user's credit/debit card;
- 3) bank account details and number, mobile wallet number, mobile money number of the beneficiary
- 4) User info of the card of the user and the beneficiary are processed in compliance with

PU Group Limited. Certificate PCI DSS Level 1

(C) Information regarding ordered bank transfer:

- 1) names and surnames of parties to the transaction;
- 2) amount of the ordered transfer;
- 3) information regard the transfer's execution;
- 4) other information connected to the ordered transfer, acquired through communication

with the Company, but crucial to and/or necessary to resolve given situations, which is the subject

of communication with the company.

(D) Other information provided and gathered by:

- 1) taking part in contests and promotions conducted by the Company or our partners;
- 2) during communication with the Company, but crucial to and/or necessary to resolve given situations, which is the subject of communication with the Company.

(E) information about the device used to visit the Platform and/or order services:

- 1) location information of the device;
- 2) model of the device, operation system and the system's version;
- 3) unique device identifier;

4) information about cellular network;
5) identification of other software running on the device to
Counter fraud and/or counter malicious software, but without gathering content
from that software.

(F) Information regarding use of our services:

- 1) time of beginning and end of session;
- 2) type and language of internet browser;
- 3) address of internet protocol (“IP”).

(G) Information about the user from third parties, including:

- 1) external verification entities
- 2) mailing list providers and publicly available sources (if it’s not against
current regulations).

(H) Information gathered through cookie files and web beacons, including:

- 1) through web beacons and cookie files used on your device.

(I) Any other information about the user and the beneficiary that may be required to
provide the service.

6. PERSONAL DATA PROCESSING

The Company processes gathered data for the following purposes:

(A) to execute a contract, including providing services, to adjust services to its
user’s needs, for internal and external analyses and research to improve the
Platform and/or services; to provide security of services, including to detect fraud
and abuse on the Platform and/or services and to counter them, according to art. 6
sec 1a of General Data Protection Regulation of 2018 (GDPR). Data is processed
until expiration of contract, and sometimes, in cases where it’s allowed or required

by law, data can be processed after the contract's expiry, for example for the purpose of global statistics processing, regulation of claims and commitments.

(B) For statistical analysis, such as identification of unique users, to determine number and time of visits, to determine the beginning and end of session, to ensure functionality of the Platform; in regard to marketing, including analysis and profiling, products and services of the Company, in accordance with art. 6 sec. 1f of General Data Protection Regulations of 2018 (GDPR). The Company processes data until an explicit objection to the processing is raised by the owner of the personal data. 3.2 Processing of personal data is conducted in accordance with art. 6 sec. 1a of General Data Protection Regulation of 2018 (GDPR) and only in the time the consent to process personal data is valid.

7. TRANSFERRING OF PERSONAL DATA

PU Group Limited

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Registered in the United Kingdom, register number 11072026, company's address:
1 Northumberland Avenue

Office 301, Trafalgar Square, London, England WC2N 5BW, which provides payment services by processing orders to provide the Company's services. Payment institutions are the personal data processors based on co-operation agreement between the Company and the Payment institutions.

Solely to provide services, the Company transfers personal data, mentioned in sec. 2 (A) and 2 (B) of this Policy payment institution UAB "Best Finance", legal entity code 304885975, address Mindaugo st. 1A-104, LT-03108. Vilnius, Lithuania. Money Transfer Service Provider is supervised by the Bank of Lithuania, e-mail

address info@bestfinance.lt, contact phone number +370 614 666 99. Money Transfer Service Provider is supervised by the Bank of Lithuania.

Solely to provide services, the Company transfers personal data, mentioned in sec. 2 (A) and 2 (B) of this Policy payment institution Alfa Bank JSC (Ukraine), set up and registered in Ukraine's EDRPOU (Unified State Register of Enterprises and Organizations of Ukraine): 23494714, company's address: 01001, Kiev, street: Desyatinnaya, 4/6 Licence NBU (Ukraine's National Number) no. 61 of 10/05/2011, who is the personal data processor based on a tripartite agreement between the Company, Financial institution and the Ukrainian entrepreneur's business partner, registration number of the tax payer's card: 2606124596.

Payment Institutions can transfer personal information under their own Privacy Policy and regulations to conduct the Money Transfer Service.

The Company can transfer information about ordered services to appropriate state and regulation authorities, under the condition that it suspects infringement of regulations of law and if the obligations arises from the Act of money laundering of 2017 (The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017), as well as, arising from any other legal act of The United Kingdom or a country where funds are transferred.

The Company can transfer personal data to other Payment Institutions in case of establishing new cooperation to provide the Service.

The Administrator has the right to cooperate with external companies in terms of providing various services, including marketing. To provide above services the Administrator can transfer to those companies some gathered information mentioned, only in the range necessary to provide appropriate services by the Company. We commit to signing a contract regarding confidentiality of providing services to third parties.

The Administrator has the right to cooperate with external companies outside of EEA (European Economic Area) in terms of providing various services.

In the process of ordering services the user consents to transferring of data.

Newsletter

Personal Data Processing takes place also when you order the service of Newsletter. The legal basis for personal data processing in this case is this policy and consent that it contains:

I hereby consent to processing of my personal data (e-mail address) provided in the process of registration. The consent is given by accepting privacy policy and providing us with your e-mail address.

- Providing your personal data and consenting to processing is voluntary.
- At any time you can opt out of the Newsletter and withdraw your consent to process personal data.

Contests and promotions

If you want to take part in contests organised by us, please provide information necessary for conducting given action, communication and possible notification about your winning and bookkeeping.

Cookie files

We gather information such as technical data of the device with which you gain access, including information on internet connection, IP address and other technical details provided by your browser. We process information on when and how you use our services, those are, among others, measurement data, movement data, transaction history and their type, data regarding your activity. We gather information through cookie files and similar technologies.

How long do we store personal data?

Any data gathered by us are stored on our servers or servers of entities cooperating with us. We use appropriate technical and organizational protection to ensure security of personal data, protecting from illicit data processing, accidental loss, damage or destruction of data. Entities cooperating with us are also obliged to manage data according to our safety and privacy protection requirements. We process personal data within a time necessary goals laid out in this Privacy policy.

8. INFORMATION DISCLOSURE

The Administrator has the right to cooperate with external companies in terms of development and

enhancement of the Platform and /or services. Such companies gather statistical information about the use of the Platform and are authorised to use personal data only in the manner necessary to provide the Administrator with appropriate services. We commit to signing a non-disclosure agreement every time we use external companies.

The Company has the right to divulge publicly general information about its Platform's users only if it's impossible to determine the owner of such information.

The Company can divulge information to comply with regulations of law, conduction court proceedings or proceedings conducted by state authorities, regardless of the country of residence of the user or other socially material instances.

9. RIGHTS AND OBLIGATIONS OF USERS

Due to personal data processing based on consent to process personal data the user has following rights:

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1) the right to access to data, its correction and deletions (in situations not forbidden

by law);

2) the right to receive a copy of stored data;

3) the right to limited personal data processing or refusal of consent to process personal data;

4) the right to file a complaint to personal data protection authority;

5) the right to cancel previous consent to personal data processing (without effect on data processing that was done before the cancellation of consent);

6) the right to object to personal data processing for specific purposes;

7) other rights arising from the General Data Protection Regulation of 2018 (GDPR)

(RODO) (General Data Protection Regulation 2018 (GDPR)).

The user can exercise their rights by contacting the Administrator through email at: legal@spoko.app

The Platform's users are responsible for confidentiality of their personal data, the Administrator does not take responsibility for occurrences caused by improper storage or loss of the data by the user.

10. FINAL PROVISIONS

If the Company decides to change the Privacy policy, changes will be posted here. The user can always know what kind of information we gather and how we can use

or disclose it. All changes of the Policy will be deemed effective the moment they are published on the Platform.

Should you have any questions regarding this Policy, you can contact over email: legal@spoko.app or send a letter to: 85 Great Portland Street,

First Floor, London, England, W1W7LT

During ordering a service, visiting and/or using the Platform.

The user declares and guarantees that they're authorised to accept the Privacy policy in their name and each represented by them parties. If you don't agree to the terms of this Privacy policy, don't order services and/or use the Platform.

By ordering a service and/or using the Platform you confirm that you agree that you have read this Policy, you understood and agree with its provisions. If you don't agree to the terms of this Privacy policy, don't order services and/or use the Platform.

This Policy has been prepared in English and translated in Russian, Polish and Ukrainian, namely languages used on the Platform. The user initializes the language of the Platform. In the event of discrepancies between the English, Polish, Russian and Ukrainian language versions, the English version will prevail.