

## **PRIVACY AND COOKIE POLICY**

Last modified: December 12, 2022

Entry into force: December 12, 2022

### **1. INTRODUCTION**

We are PCOMPANY, OU, a limited company registered in Estonia, registration number 16367501, incorporated under the jurisdiction of the Republic of Estonia, located at Harju maakond, Tallinn, Lasnamäe linnaosa, Narva mnt 150, 13619. PCOMPANY, OU is operating the platform under the name of Decamel at <https://decamel.com/>. For the purpose of data protection laws, we are the controller, and are responsible for Your personal data (collectively referred to as "Decamel", "we", "us" or "our" in this privacy policy). Decamel respects Your privacy and is committed to protecting Your personal data. This privacy policy will inform You as to how we look after Your personal data when You visit our website (regardless of where You visit it from), and tell You about Your privacy rights and how the law protects You.

This policy may be amended or updated from time to time and revised versions will be shown on our website. It is Your responsibility to check for the most recent version of this policy.

This Policy applies solely to Personal Data collected by this website. Personal Data is understood as any information that identifies a natural person or a legal person, either directly or indirectly, regardless of the form or format in which such data exist. You or User are understood as the natural person (whether as a natural person and/or a natural person as a legal representative of the legal entity) using the website, which must coincide with or be authorized by the User, to whom the Personal Data refer. All other terms, if used capitalized, are to be understood as in the Agreement for User Terms and Conditions.

### **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, refers to any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about You that we have grouped together as follows:

- Identity Data, which includes first name, last name, username or similar identifier, title, date of birth and gender, and related identifiers.
- Contact Data, which includes billing address, email address, telephone numbers, and related identifiers.
- Financial Data, which may include bank account details, and related identifiers.
- Transaction Data, which includes details about payments to and from You and other details of products and services You have purchased from us, and related identifiers.
- Technical Data, which includes internet protocol (IP) address, Your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices You use to access this website, and related identifiers.
- Profile Data, which includes Your username and password, Your transactions, Your interests, preferences, feedback and survey responses, and related identifiers.
- Usage Data, which includes information about how You use our website, products and services.
- Marketing and Communications Data, which includes Your preferences in receiving marketing from us and our third parties and Your communication preferences, and related identifiers.

### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about You including through:

3.1. Direct interactions. You may give us Your Identity, Contact and Financial Data by filling in forms or by corresponding with us. This includes personal data You provide when You:

- create an account on our website;
- use our services;
- request marketing to be sent to You;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

3.2. Automated technologies or interactions. As You interact with our website, we will automatically collect Technical Data about Your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about You if You visit other websites employing our cookies. Please see information about cookie policy in this document for further details.

3.3. Third parties or publicly available sources. We may receive personal data about You from various third parties, such as other users of our website/services or advertising networks, and public sources.

#### 4. HOW WE USE YOUR PERSONAL DATA

We will use Your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with You.
- Where it is necessary for our legitimate interests (or those of a third party) and Your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where You authorized us to do so.

#### 5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use Your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process Your personal data for more than one lawful ground depending on the specific purpose for which we are using Your data. Please contact us if You need details about the specific legal ground we are relying on to process Your personal data, where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register You as a new User (Investor)	(a) Identity (b) Contact	Performance of a contract with You
To process and deliver Your transactions and services: (a) Manage payments, fees and charges; (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with You (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with You which will include: (a) Notifying You about changes to our terms or privacy policy (b) Asking You to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with You (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable You to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with You (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) (c) Consent

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to You and measure or understand the effectiveness of the advertising we serve to You	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to You about goods or services that may be of interest to You	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

## 6. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about You. We do not control these third-party websites and are not responsible for their privacy statements or their handling of Your data. When You leave our website, we encourage You to read the privacy policy of the websites You visit.

## 7. CONNECTED THIRD-PARTY SERVICES

Where You have used a third-party social media account to set up or login to Your Decamel account, we may receive data from, or share data with, those third-party social media platforms. Their privacy policies will apply in addition to this privacy policy and shall take precedence in the event that their terms conflict with this policy.

Third party privacy policies will also apply in respect of integrated services which collect data, namely:

- Google Additional Terms, Privacy Policy, and related policies, <https://policies.google.com/terms?hl=en-US>;
- Meta/Facebook Additional Terms, Privacy Policy, and related policies, [https://www.facebook.com/legal/FB\\_Work\\_Privacy](https://www.facebook.com/legal/FB_Work_Privacy);
- LinkedIn Additional Terms, Privacy Policy, and related policies, <https://www.linkedin.com/legal/privacy-policy>;
- KEVIN EU, UAB, Additional Terms, Privacy Policy, and related policies, <https://www.kevin.eu/docs/privacy-policy/>;
- Identomat Inc, Additional Terms, Privacy Policy, and related policies, <https://identomat.com/cookie-policy>;
- Additional Terms, Privacy Policy, and related policies of other service providers We work with.

## 8. DATA SECURITY

All information You provide to us via email or Our Site 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 Our Site, 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 receive it.

We test our systems regularly to make sure our security mechanisms are up to date. The security measures in place will, from time to time, be reviewed in line with legal and technical developments.

No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If You have any questions about security on Our Site, You can contact us via email.

## **9. COOKIES**

A cookie is a small data file which is saved automatically in Your device through the browser when You are using the browser. Cookies include the specific details of the specific user of a website and the specific website. Cookies help You identify Yourself on a website and enable You to use various functions on a specific website, for example, a website would use Your cookies to remember Your preferences, settings, to collect data about visits to the website, etc.

The following types of cookies may be used:

- strictly necessary/essential cookies without which it is not possible to use the features of the website and provide the services;
- performance cookies that collect information about how You use a website and are used to improve how a website works;
- functionality cookies that allow the website to remember choices You make (e.g. user name, language) and provide enhanced, more personal features;
- behaviorally targeted advertising cookies that are used to deliver adverts most relevant to You and Your interests. They are usually placed by advertising networks with the website operator's permission. They remember that You have visited a website and this information is shared with other organizations (e.g. advertisers).

Upon visiting the Website, a pop-up window is opened on the website that notifies You of the use of cookies asks for Your acceptance. If You refuse to accept the cookies, then only the technical cookies, strictly necessary for using the Website, shall be used.

Refusing to accept the cookies may reduce the quality of Your user experience and You may not have access to some of the services provided by us.

If You disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## **10. WE DISCLOSE YOUR PERSONAL DATA**

We disclose Your Personal Data to third parties without Your prior consent only if provided in this Policy or in the Agreement for User Terms and Conditions or the law. We do not sell, rent or trade Your Personal Data. We may or we must disclose Your Personal Data to the following third parties:

- service providers we use in order to provide You the Services and perform under the Agreement (e.g. third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies). If not stated otherwise, we remain responsible for Your Personal Data and take all necessary measures to protect Your Personal Data as provided in this Policy. The up-to-date list of these parties may be requested from us at any time;
- an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets;
- regulatory bodies and supervisory authorities;
- our lawyers, auditors, accountants and service providers.

Note that You may have profiles that other clients and/or the public can see and browse. The public can see the information posted under the campaigns (e.g. the names, pictures and details of the members of the team published under campaigns, videos etc). In addition to the Personal Data provided (i.e. name, country, e-mail address, phone number, picture, profession, among others), the profile visible for other clients may contain Your interactions with this Site

(e.g. information about the campaigns You have initiated and launched, the results of the campaigns, the investments You have made, Your comments, documents posted, the campaigns You are following, Your visits of campaigns and profiles etc).

## **11. WHERE WE STORE YOUR PERSONAL DATA**

Your Personal Data is processed at our operating offices and operating offices of our designated cooperation partners in Estonia or the European Union. Some servers may physically be located outside of the European Union with service providers being registered in countries other than the European Union. We note that in some cases we may transfer Your Personal Data to third countries. In case we transfer Your Personal Data to third countries, we follow data protection rules relevant for us and apply Personal Data security measures.

## **12. HOW LONG WE STORE YOUR PERSONAL DATA**

We only store Your Personal Data as long as necessary for the purposes of the Personal Data collected and as long as required by law.

Should You wish to delete Your account or any of Your Personal Data on the Site, You should notify us. Your account and Your Personal Data will be deleted as soon as practically possible, usually within 3 working days. Note that it may be a bit longer with back-up data. If You have initiated and launched any campaigns or made any investments, it may not be possible to delete some of the Personal Data related to such campaigns or investments. Such Personal Data shall be kept until necessary, depending on the campaign and investment, but at least 10 years.

In accordance with the Estonian accounting and taxation laws, invoice-related information is retained for a period of up to 7 years as of the end of the financial year when such information was provided to us.

Information on any legal transactions between us may be retained for a period of 10 years as of their provision to us in accordance with the general limitation period set for civil claims in the Estonian General Part of the Civil Code Act.

## **13. HOW WE PROTECT YOUR PERSONAL DATA**

We implement appropriate organizational, technical and physical safeguards to protect Your Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access and against all unlawful forms of processing. We use firewalls, password protection and other access and authentication controls to avoid unauthorized access to Your Personal Data. The servers we use are located in a secure environment with limited access. Only employees who need it have access to Your Personal Data.

## **14. YOUR RIGHTS AND OBLIGATIONS**

To the extent required by law, You have the right to:

- receive information about Your Personal Data we process;
- ask us to correct Your Personal Data that is incorrect;
- ask us to stop or restrict processing, disclosing or enabling access to, delete or close Your Personal Data the processing of which is not permitted on the basis of law;
- withdraw any consent You have given to us for Personal Data processing;
- ask Your Personal Data portability;
- object automated decisions with respect to You;
- turn to the Data Protection Inspectorate or the court to safeguard Your rights.

These actions can either be done automatically by You by changing the respective settings of Your account or, if not automatically possible, then by contacting us, except the latter on the list, for which You have to contact the Data Protection Inspectorate.

We note that in some cases we make (partially) automated decisions regarding You (e.g. during KYC/AML procedures). In case You would like to debate automated decisions, contact us by regular post or e-mail.

## **15. CHANGES TO THIS POLICY**

The provisions set out in the Agreement for User Terms and Conditions regarding changes apply.

This policy may be amended or updated from time to time and revised versions will be shown on our website. It is Your responsibility to check for the most recent version of this policy.

## **16. CONTACT**

If You have any questions, comments, complaints or requests related to this Policy or the processing of Your Personal Data, You can contact us via:

PCOMPANY, OU

Registration number: 16367501

Registered office: Harju maakond, Tallinn, Lasnamäe linnaosa, Narva mnt 150, 13619

Email: [info@decamel.com](mailto:info@decamel.com)