

PRIVACY POLICY

The European Crowdfunding Alliance IT platform ("ECRA IT Platform") provides support, solutions and IT/ campaign/documentation services ("Services") to companies looking to raise fund for their early-stage projects through a Profit Sharing Agreement process. ECRA IT platform enables investors ("Investor") to invest in such projects through a Profit Sharing Agreement to gain a profit share from the projects. This Privacy Policy describes what information ECRA IT platform collects and how it is used and applies to all services that the ECRA IT platform offers and all persons that the ECRA IT platform engages with.

We are committed to protect the rights of individuals in accordance with the General Data Protection Regulation (reference EU2016/679) 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 ('GDPR').

Personal Data means information that can directly or indirectly identify you or other individuals ("Personal Data"). This typically includes information such as your last name, name, middle name, name suffix, patronymic date of birth, nationality, passport details, address, email address, telephone number. Personal Data can also include other information such as your bank details, projects you invested into and all its relevant details, other information related to your investment activity with the ECRA IT platform.

The categories of Personal Data, that we process, depend on how you use our services. We use your Personal Data to provide our website services in alignment with your preferences, to deal with your requests, to contact you regarding tailored products, projects and services which may be of interest to you, to provide information about our new projects, the current stage of our projects you invested in, or to carry out relevant administrative services. All Personal Data is processed in accordance with applicable data protection laws.

We do not disclose your Personal Data to any third party except to data processors that assist us with providing our services and authorized state and regulatory authorities. With your consent, we use cookies for marketing, performance and statistical purposes.

As our valid user, we also offer you various choices to control how your Personal Data is used. Alternatively, you can contact our customer service team at service@ecra.pro.

If you would like to receive more information about the processing of your Personal Data by us and on the cookies that we use, please see the extended version of this Privacy Policy.

1. Data Protection Principles

The ECRA IT platform is committed to protecting the privacy and security of your Personal Data. The ECRA IT platform is a "data controller", meaning that we are responsible for deciding how we hold and use your Personal Data. We will comply with data protection law, which says that Personal Data must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

2. Our Privacy Policy

We are committed to safeguard your privacy and ensure that your Personal Data is protected. This Privacy Policy explains the types of Personal Data we collect and how we process and protect that data.

This Privacy Policy applies to Personal Data processed by us in connection with the services and products we offer to you ("Service(s)"). This includes Personal Data collected offline through our customer services or direct marketing campaigns, competitions, surveys and online through the ECRA IT platform website, applications and branded pages on third party platforms and applications accessed or used through such websites or third-party platforms ("website"). The website includes the ECRA IT platform mobile application (an "App").

This Privacy Policy also applies to our targeted content, including online offers and advertisements for products and services, which we (or a service provider acting on our behalf) may send to you on third party websites, platforms and applications ("Third Party Sites") based on your use of the internet. These Third-Party websites may have their own privacy policies and terms and conditions. We encourage you to read them before using those Third-Party Sites.

2.1. Who is Responsible for what happens with your data?

The European Crowdfunding Alliance IT platform ("ECRA IT Platform" or "we"; "our"; "us"), being a data controller, is responsible for processing of your Personal Data in relation to the Services. You can contact us via email service@ecra.pro if you have any questions.

2.2. Who is ECRA's Data Protection Officer?

You can contact the Data Protection Officer by email service@ecra.pro.

2.1. When do we ask for your consent?

By using our Services and our website, you acknowledge that we are processing your Personal Data in accordance with this Privacy Policy. If you do not wish that we process your Personal Data in this way, please do not use our Service or website or otherwise provide our website with your Personal Data.

We process your data to provide you the Services and the website. In certain instances, we only process your data if you have consented, for example in certain cases where we process your Personal Data for marketing purposes, use cookies or process your sensitive data. Where we process your data on the basis of your consent, we will ask for your consent explicitly. We may also ask you to provide additional consent if we need to use your Personal Data for purposes not covered by this Privacy Policy or before sharing your Personal Data with group companies or relevant subsidiaries of the ECRA IT platform for the purposes of marketing.

2.3 For which purposes do we process your Personal Data?

We collect your Personal Data directly when you visit our website and/or when you provide us with Personal Data when you purchase Services, subscribe to our newsletter, receive information or mailings, use our applications, complete a survey, and/or make a comment or enquiry or contact our customer services. We may also receive Personal Data about you from other sources, including information from commercially available sources, such as public databases and data aggregators, and information from third parties.

In more detail, we process the following categories of Personal Data for the following purposes:

2.3.1. Surfing on our Sites – with or without Cookies

2.3.1.1. Which Personal Data do we collect about you?

For this purpose (Surfing on our website) we process the following Personal Data: Information about the type of browser you use, details of the web pages you have viewed, your IP and device address, your Cookie ID, hyperlinks that you have clicked, your user name, gender, networks, the websites you visited before arriving at our relevant Sites and information collected by cookies or similar tracking devices and any other information you choose to share when using Third Party Sites, e.g. when visiting the ECRA IT platform website's on social media networks, such as Facebook, Instagram, Twitter, YouTube channel, etc. Our website involves simple links to social media networks; the ECRA IT platform not transmit any Personal Data to the provider of the relevant social media network when you click on such link.

2.3.1.2. What is the purpose of processing your Personal Data?

We (and third-party service providers acting on our behalf or on their own behalf) use cookies and similar technologies to process data about you when you visit our relevant website. Cookies are files that store information on your computer hard drive or browser that mean that we can recognise that you have visited us before. We use cookies and similar technologies (like pixels, fingerprints and other tools) to improve our products and your experience on our website by evaluating the use of our website, products and services and understand your browsing and shopping habits, analysing the effectiveness of our advertisements, personalising your website experience as well as evaluating statistics on website activity, evaluating (anonymously and in the aggregate) statistics on website activity, such as what time you visited it, whether you've visited it before and what site referred you to it, reviewing the Services that you have searched online and ended up purchasing them, making our website easier to use and to better tailor our website and our Services to your interests and needs, identifying that you have visited our website but did not purchase a Service, collecting information about your device and linking this to your Personal Data so as to ensure that our website present the best web experience for you and supplementing the Personal Data that you provide to us with other information that we hold or that we may receive from commercially available sources, such as public databases and data aggregators, and third parties. For more information about the use of cookies, please see our Cookie Policy.

2.3.1.3. How long do we store your Personal Data?

Please check our Cookie Policy to learn about the storage periods for each cookie.

2.3.1.4. What is the legal basis for processing your Personal Data?

Some cookies and similar technology used on our website are necessary for the performance of a contract with you or necessary for legitimate interests of the ECRA IT platform. For all other cookies and similar technologies used on our website, your consent is the legal basis for processing your Personal Data. To obtain your consent, we ask you to accept the use of such cookies and similar technologies through a cookie banner, a pop-up window or similar means on our website.

It is always possible for you to visit our website without disclosing your Personal Data. This requires that you have disabled cookies. Please note, however, that without cookies you may not be able to use all of the features of our websites or online services.

For more information about the use of cookies, please see our Cookie Policy.

2.3.2. Contact

2.3.2.1. Which Personal Data do we collect about you?

For this purpose (Contact) we process the following Personal Data: Last name, name, middle name, name suffix, patronymic, title, postal address, email address, home telephone or mobile number, or payment history, payment information (i.e. bank or credit card details), buying/selling your investment in Profit Sharing Agreements history, age, date of birth, gender, passport details (number, country of

issue, expiry date), posts and other content you submit to our websites, other Personal Data you voluntarily provide to us, information on the handling of your request (including information on special requests or wishes), queries from us and further information submitted with your request. Please, however, refrain from sending us sensitive data (data on your racial or ethnic origin, political opinions, religious or other beliefs or otherwise of a trade union or condition or private life) in unencrypted emails.

2.3.2.2. What is the Purpose of processing your Personal Data?

We process your Personal Data whenever you contact us and respond to your enquiries and comments. We process your Personal Data that you enter when you buy your investment through a Profit Sharing Agreement. We process Personal Data to provide you with our Services that you request from us, including responding to your queries or comments. We look at the Services you engage with at our websites and that you have viewed on our websites.

2.3.2.3. How long do we store your Personal Data?

We store your Personal Data only as long as required for the relevant purpose, unless we are required by the law to store them for a longer period.

2.3.2.4. What is the legal basis for processing your Personal Data?

Applicable data protection legislation allows the ECRA IT platform to process your Personal Data for the purpose of performance of a contract with you (i.e. fulfil your contact request).

If you provide to us Personal Data that is considered sensitive (e.g. information on your health, racial or ethnic origin, political opinions, religious or other beliefs or otherwise of a trade union or condition or private life), your separate explicit consent will be the legal basis for processing your Personal Data.

2.3.3. Suggestion of our products and services which may be of interest for you; marketing communication

2.3.3.1. Which Personal Data do we collect about you?

For this purpose (suggestion of our products and services which may be of interest for you) we process the following Personal Data: Last name, name, middle name, name suffix, patronymic, title, postal address, email address, mobile number, the ECRA IT platform user number account, buying/selling your investment in Profit Sharing agreements history (including purchases you make on ours, including the Apps), payment history, age, date of birth, gender, passport details (number, country of issue, expiry date), Services you view on our website, favourite store, actions you take on our website or when viewing our emails, answers you provide in researches or competitions, marketing surveys, your investment preferences and information about your investment activity.

2.3.3.2. What is the purpose of processing your Personal Data?

We process your Personal Data to suggest tailored products or services that we think may be of interest to you. We may do this by sending you – via post, email, newsletter, SMS, push notifications or phone – details of products, services, special offers, promotions and other information. We also contact you to offer the opportunity to take part in customer research surveys, promotions, prize draws or competitions.

2.3.3.3. How long do we store your Personal Data?

We store your Personal Data only as long as required for the relevant purpose, unless we are required by the law to store them for a longer period.

2.3.3.4. What is the legal basis for processing your Personal Data?

Your separate express consent in receiving marketing communications shall be the legal basis for processing.

You can opt out of receiving such marketing communications at any time by clicking the 'unsubscribe' link at the bottom of the communications we send you.

2.3.4. Purchase and Providing of Services

2.3.4.1. Which Personal Data do we collect about you?

For this purpose (suggestion of our products and services which may be of interest for you) we process the following Personal Data: Last name, name, middle name, name suffix, patronymic, title, postal address, email address, mobile number, the ECRA IT platform user number account, buying/selling your investment in Profit Sharing Agreements history (including purchases you make on our website including the Apps), payment history, age, date of birth, gender, passport details (number, country of issue, expiry date), Services you view on our website, favourite store, actions you take on our website or when viewing our emails, answers you provide in researches or competitions, marketing surveys, your investment preferences and information about your investment activity.

2.3.4.2. What is the Purpose of processing your Personal Data?

We process your Personal Data to process your online and / or offline purchase and deliver the relevant Service(s) to you as ordered. Your payment related Personal Data may be transferred to payment providers to process your payments.

2.3.4.3. How long do we store your Personal Data?

We store your Personal Data only as long as required for the relevant purpose, unless we are required by the law to store them for a longer period.

2.3.4.4. What is the legal basis for processing your Personal Data?

Applicable data protection legislation allows the ECRA IT platform to process your Personal Data for the purpose of performance of a contract with you (i.e. your purchase of Services).

If you provide to us Personal Data that is considered sensitive (e.g. information on your health, racial or ethnic origin, political opinions, religious or other beliefs or otherwise of a trade union or condition or private life)), your consent will be the legal basis for processing your Personal Data.

2.4. Who is receiving your Personal Data?

2.3.1. Our service providers (processors)

We may share your Personal Data with the following data processors (i.e. service providers):

- ✓ Relevant companies of the ECRA IT platform and trusted third parties which directly support our promotional activities, website administration.
- ✓ Trusted third parties to help us process and analyse your Personal Data, to give us insights about you that we can use to improve our advertising, products and services, and to track the effectiveness of a particular promotion or campaign;

If you purchase Services from us, trusted third parties to allow delivery of the Services you have ordered (e.g. service provider of our online system).

Unless you provided consent, each trusted third party is not authorised by us to use your Personal Data in any other way. Each trusted third party will be required by us to implement adequate technical and organizational measures to protect your Personal Data.

2.4.2. Other recipients (controllers)

We may share your Personal Data with the following controllers (i.e. third parties that process your Personal Data for their own purposes):

- ✓ Social media platforms (e.g. Facebook, Instagram) so that they can help us deliver our advertisements directly to your social media page or mailbox;
- ✓ Law enforcement or other agencies if we are required to do so by law, or by a warrant, subpoena or court order to disclose your Personal Data.
- ✓ Third party suppliers of services which you purchase through our websites.

2.4.3. Sharing your website usage information

We may with your consent share site usage information with trusted third parties (e.g. advertisers, advertising agencies, advertising networks, data exchanges, etc.) in order to offer you tailored content, including more relevant advertising for services and products which may be of interest to you. These trusted third parties may set and access their own cookies, web beacons and similar tracking technologies on your device in order to help us deliver customized content and advertising to you when you visit our relevant website or third-party sites.

2.4.4. Details about recipients of your Personal Data

Upon your request, we will provide you with more details about third parties involved in processing of your Personal Data, namely their names, addresses and role in Personal Data processing.

2.5. To which countries do we transfer your Personal Data?

Many of the recipients of your Personal Data are based in the European Union / the European Economic Area and the UK. However, we may need to transfer your Personal Data to a location outside of the European Economic Area, including to countries that do not offer the same level of protection with respect to Personal Data as required in the European Economic Area and where there is no adequacy decision by the European Commission. If your Personal Data should be transferred to such country, we have, where required by applicable data protection legislation, ensured that an adequate level of data protection is achieved by a recognized legal mechanism, e.g. by means of the EU-U.S. Privacy Shield certification, so-called Standard Contractual Clauses, as published by the European Commission or Binding Corporate Rules. Please note that such recognized legal mechanism is not required where the transfer is necessary for the conclusion or performance of a contract concluded in the interest of you between the ECRA IT platform and another natural or legal person, such as the third-party suppliers.

For situations where we conduct cross-border transfers of your Personal Data internally within different locations of the ECRA IT platform, the ECRA IT platform has, in order to maintain an adequate level of data protection, committed itself to comply with the so-called Standard Contractual Clauses.

2.6. How long do we process your Personal Data?

We will store your Personal Data only until the aforementioned purposes for which we have collected or received your Personal Data have been fulfilled and once our statutory obligations to retain records have expired.

2.7. How we process your Personal Data (methods of processing, operations to be performed on your Personal Data)

We process your Personal Data either manually or automatically by means of collection, recording, systemization, accumulation, storage, specification (update, modification), retrieval, usage, transfer (provision, access), depersonalization, blocking, deletion, destruction and other operations on personal data, which are allowed under applicable data protection law.

2.8. What are your rights?

You have the right to request from us:

- ✓ Confirmation as to whether or not we process Personal Data from you and, where that is the case, access to your Personal Data;
- ✓ Rectification of inaccurate Personal Data;
- ✓ Erasure of Personal Data;
- ✓ Restriction of processing of Personal Data;
- ✓ To receive the Personal Data which you have provided to us and to have transmitted those Personal Data to another data controller without hindrance.

You have the following rights:

- ✓ To object to any decision that significantly affects you being taken solely by automated processing;
- ✓ Not be subject to any decision that significantly affects you being taken solely by automated processing;

To exercise any of your rights please contact us via email to service@ecra.pro

2.9. Can you withdraw your consent to the processing of Personal Data?

If your consent is the legal basis for the processing of your Personal Data, you can withdraw your consent at any time. This will not affect the lawfulness of the processing based on your consent before the withdrawal. You can withdraw your consent by sending us an email to the email address listed in Section 2.1.

2.10. Can you complain with the data protection authorities?

If you think that the processing of Personal Data by us violates applicable data protection laws, you can lodge a complaint with the competent supervisory authority.

2.11. Do you have to provide your Personal Data to buy your investment on the website?

You are not legally required to provide the Personal Data. However, if you do not want to provide your Personal Data, you may not purchase Services.

In order to purchase Services on our website, you must provide the Personal Data as listed in subsequent Sections.

If you do not provide the relevant Personal Data or if you reject cookies or do not provide your consent in context of other services than purchasing Services or the ECRA IT platform, you may not receive such services at all or without interruption.

2.12. How do we protect your Personal Data?

We maintain appropriate technical and organizational measures to protect the Personal Data you provide to us against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to your Personal Data. Our security measures are being improved continuously as new technology develops.

Our website may contain hyperlinks to other websites provided by third parties. We do not control these third-party websites or any of the content contained on those websites. Once you have left our relevant website, we cannot be responsible for the protection and privacy of any information which you provide. You should exercise caution and look at the relevant privacy policy for the website you visit.

2.13. Can we change our Privacy Policy?

We may change this Privacy Policy from time to time by posting the updated version of the Privacy Policy here. To the extent processing of your Personal Data be based on your consent, we must not change the scope of such processing, unless you have given additional consent to the changed scope of such processing. We encourage you to visit this area frequently to stay informed.