

# PRIVACY POLICY

Effective date: May 25, 2025

This Privacy Policy explains how we, METASWAP SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ, KRS 0001143298, NIP 7252350594, (hereinafter referred to as «METASWAP») handle and treat your data when you register or visit our site, [www.macpay.io](http://www.macpay.io) or associated sites or pages (hereinafter referred to as «Site»), or engage with us to use the products or services that the Company provides (hereinafter referred to as «Services»). It also includes information about individuals whose personal information we may process as a result of providing the Services to third parties, and individuals who apply to work at the Company.

## 1. INTRODUCTION

This Privacy Policy explains our approach to any personal information that we collect from you or which we have obtained about you from a third party, and the purposes for which we process your personal information. It also sets out your rights in respect of our processing of your personal information.

This Privacy Policy aims to:

- Clarify the nature of personal Information we want to inform you about the types of personal information that we collect, how we collect it, and the specific purposes for which it is used. We may collect information directly from you or through third parties, such as business partners or service providers, depending on your interactions with us and our Site.
- This policy outlines the different purposes for which we process your personal information. Whether it's to provide you with our Services, fulfill legal obligations, or improve the user experience on our Site, we want you to be fully aware of how and why your information is used.
- This Privacy Policy will also explain your rights in relation to your personal information. You have the right to access, correct, update, and delete your personal information, and to request portability of your data. We also explain how you can request that we restrict or cease processing your information.
- We believe that it's important for you to make informed decisions when using the Site and engaging with our Services. By reading and understanding this Privacy Policy, you will better understand how your personal information is collected, processed, and protected by us. This will also help you make informed decisions regarding your use of the Site and Services.

Please note that this Privacy Policy only applies to personal information that we collect directly from you or third parties as part of your use of our Site and Services. It does not apply to any other data or information that might be processed outside of our control.

## **2. WHO ARE WE AND WHAT DO WE DO**

METASWAP is a firm specializing in the exchange of cryptocurrencies and related financial services, specifically buying and selling crypto, as well as converting fiat to cryptocurrencies and cryptocurrencies to fiat. We are duly incorporated and operate in accordance with the laws of the Republic of Poland. Our firm is in full compliance with the relevant regulations and laws of the Republic of Poland.

As a trusted business entity, we engage in various activities related to the exchange of digital assets, ensuring that all transactions and services are conducted with the utmost professionalism and in line with the highest legal standards.

METASWAP SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ is a **data controller** responsible for the collection, processing, and management of your personal information via our Site. This means that we determine the purposes for which and the manner in which your personal data is processed, ensuring that all activities are compliant with applicable data protection laws.

We take our role as data controllers seriously and are committed to protecting your privacy and maintaining the confidentiality and security of your personal information.

## **3. HOW TO CONTACT US**

If you have any questions about this Privacy Policy, or if you wish to exercise any of your rights as set out in this Privacy Policy, please feel free to reach out to us. We are here to help.

You can contact us using the following methods:

- By Email:

Please send an email to: [dmitrii.mand@macpay.io](mailto:dmitrii.mand@macpay.io)

-

We aim to respond to all email inquiries as soon as possible. Please provide clear details about your request to ensure we can assist you efficiently.

By Phone: +372 53883101

Our phone lines are open during business hours, and we will be happy to discuss any questions or concerns you may have regarding your privacy or the processing of your personal information.

#### **4. WHAT PERSONAL INFORMATION DO WE COLLECT**

In the course of operating our business and providing our services, METASWAP may collect and process various types of personal information. This information is essential to ensure we can deliver our services effectively and in compliance with applicable laws. The types of personal data we may collect include, but are not limited to:

- **Basic Personal Details:** This includes your name, job title, and other identifying information that allows us to know who you are.
- **Contact Data:** We may collect your telephone number, postal address, email address, and other contact information that enables us to communicate with you.
- **Website Usage and Technical Data:** We collect information regarding your interactions with our website. This includes details of your visits, browsing patterns, and technical data such as IP addresses, browser type, and the pages you visit. We also use cookies and other tracking technologies to help us analyze website traffic and improve user experience.
- **Personal Data Provided by Clients:** In the course of providing our services, we may collect personal data that is provided to us by or on behalf of our clients. This may include information related to our clients' operations, such as business transactions or communications, and could involve special categories of personal data, where relevant, to meet our service requirements.
- **Other Personal Data You Provide:** Any additional personal data that you voluntarily provide to us, whether during your use of our services or otherwise, will also be collected. This could include feedback, preferences, or any other data that helps us serve you better.

By collecting and processing this information, we are committed to protecting your privacy and using your data in accordance with the applicable data protection regulations. We only collect the personal information necessary to deliver our services effectively, and we implement measures to ensure its security and confidentiality.

#### **5. HOW WE OBTAIN THE PERSONAL DATA ABOUT YOU**

We may collect or receive your personal data in a variety of ways, including the following methods:

5.1. We collect personal data when you provide it to us directly. This may occur through various interactions such as:

- Corresponding with us via email or other communication channels.
- Completing forms on our website, including registration forms, subscription forms, or any other type of online forms.
- Interacting with our customer support team or during the course of any service-related communication.

5.2. We may collect personal data automatically when you use our website or engage with us through digital communications. This includes:

- Monitoring how you use our website, such as tracking your visits, page interactions, or search history.
- Collecting data from marketing activities or email communications we send you, including open rates, click-through rates, or other engagement metrics.

This data helps us to understand your preferences and improve your overall experience with our services.

5.3. We may receive personal data about you from trusted third-party sources. These can include:

- Know Your Client (KYC) Checks: As part of our client acceptance procedures, we may collect personal information from third-party verification services to ensure compliance with legal and regulatory requirements (such as anti-money laundering and counter-terrorism financing laws).
- Business Partners and Service Providers: We may receive personal data from other businesses, legal advisors, financial institutions, or compliance services that help us perform background checks, verify identity, or process transactions.

We ensure that any personal data received from third-party sources is handled in compliance with applicable data protection laws and is only used for legitimate purposes.

## **6. HOW WE USE YOUR PERSONAL INFORMATION**

We may collect and process your personal information for the following purposes:

6.1. We collect and maintain personal information that you voluntarily provide to us during your use of our website and/or our services to enable us to fulfill our contractual obligations and perform the services you have requested. This includes personal data provided during

inquiries, orders, or other service-related interactions. Please note that our Terms of Business apply when we provide these services to you. It is necessary for us to process your information in order to perform our obligations under any contract we may have with you. We may also process your data based on our legitimate interest to ensure the best client service and effective transaction management.

6.2. Our website may use various user interfaces, including online forms or telephone services, that allow you to request information about our products and services. When making these requests, we may collect contact information and other details relevant to your inquiry. This information is used to respond to your requests promptly and effectively. It is in our legitimate interest, or a third party's legitimate interest, to use your personal information to respond to your requests and provide you with the best possible service.

6.3. Protecting the rights and interests of third parties. In connection with business transactions such as mergers, acquisitions, or restructuring. Where we use your personal data for business transactions, legal rights enforcement, or protection of third parties, it is based on our legitimate interests or the legitimate interests of a third party. In other cases, we process your personal data to comply with legal obligations.

6.4. We may use your personal information for marketing activities, including:

- Postal and Email Marketing: We use your contact details and interactions with our website, email communications, or services to send you relevant marketing messages about our products or services. We analyze your interactions with our website and communications to understand your preferences and improve our marketing efforts. It is in our legitimate interest to process your personal data for marketing purposes. We will only send marketing communications where you have provided consent or where we have a lawful basis to do so.

6.5. We may collect information about your use of our site, services, and marketing communications through the use of cookies, web beacons, or similar technologies. This includes:

- Tracking your interactions on our website.
- Collecting data on the services you've viewed or engaged with.
- Analyzing demographic and usage data to better understand your preferences and optimize our offerings. Where this data is not anonymous, it is processed based on our legitimate interests in improving our services and ensuring we provide the best products and customer experience.

## **7. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH**

We may share your personal information with the following categories of third parties as necessary for the purposes outlined in this Privacy Policy:

- 7.1. We may share your personal data with legal, financial, or other professional advisers who assist us in operating our business and providing services to you. These professionals are subject to confidentiality obligations.
- 7.2. We may be required to share your personal data with government agencies or regulatory authorities, such as tax authorities, law enforcement, or other bodies, in order to comply with legal and regulatory obligations.
- 7.3. In the course of fulfilling our business operations, we may share your information with our insurers, including professional indemnity insurance providers, as required for risk management and insurance purposes.
- 7.4. We may share your personal data with relevant regulatory bodies, tax authorities, and corporate registries to comply with applicable laws and regulations in the Republic of Poland and EU.
- 7.5. We may share your personal information with third-party service providers who assist us with various business operations, including:

- Document processing and translation services
- Confidential waste disposal
- IT systems or software providers
- IT support services
- Document and information storage providers

These third parties are bound by confidentiality agreements and only process personal data on our behalf.

#### Third Parties Engaged in the Course of Our Services

- 7.6. In connection with the services we provide to clients, we may share your personal data with various third parties, including:
  - Counsel, arbitrators, mediators, or clerks
  - Witnesses, cost draftsmen, or court personnel
  - Opposing parties and their legal representatives
  - Document review platforms and experts such as tax advisors or valuers

These parties may require access to your data to assist in legal proceedings, mediation, or advisory services.

7.7. We may share your personal information with third-party analytics providers such as Google Analytics to analyze website usage, improve our services, and personalize our communications.

7.8. We may share your personal data with postal or courier providers to deliver documents, postal marketing materials, or other communications related to our services.

Please note that this list is not exhaustive, and there may be additional third parties with whom we share your personal information where necessary to provide our services effectively and in compliance with applicable laws.

## **8. WHERE DO WE TRANSFER YOUR DATA TO**

8.1. In the course of our business operations, we may transfer your personal data to locations outside the Republic of Poland. This may occur in the following circumstances:

- Third-Party Service Providers. We may transfer your personal data to third-party service providers that assist us in delivering our services. These service providers may be located in various countries, including those outside of the Republic of Poland. Examples of such service providers include IT service providers and data storage providers.
- If required by law, we may transfer your personal information to regulatory authorities or government bodies, which may be located outside of the Republic of Poland. This includes, for example, when we comply with tax laws, anti-money laundering regulations, or other legal obligations that require cross-border data sharing.
- As part of our operations, we may use global platforms or cloud-based services which may involve transferring your personal data to countries outside EU. These transfers may include jurisdictions where data protection laws may not be as comprehensive as those in EU. In such cases, we will take appropriate measures to ensure that your data remains protected, including entering into Standard Contractual Clauses (SCCs) or other safeguards to protect your personal data in accordance with applicable laws.

8.2. We take the protection of your personal data seriously, and where necessary, we will implement appropriate security measures to safeguard your information during international transfers. This may include encryption, anonymization, or entering into agreements with the recipients to ensure they uphold similar data protection standards.

## **9. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR**

9.1. We only retain your personal data for as long as necessary to fulfill the purposes for which it was collected, or as required by law. The specific retention periods vary depending on the

type of information and the nature of our relationship with you. Below are some of the key considerations regarding how long we keep your personal data: We retain your personal information for the duration necessary to comply with legal obligations, including but not limited to tax, accounting, and anti-money laundering regulations. This includes maintaining records for audits or compliance with government or regulatory requirements.

- 9.2. If your personal information was collected as part of a client relationship, we will retain your personal data for the length of that relationship. Once the relationship ends, we will retain your data for a period to allow us to finalize any outstanding contractual matters, resolve disputes, and comply with applicable laws.
- 9.3. For individuals who have consented to receive marketing communications from us, we will retain your information as long as you remain a potential client or until you withdraw your consent. If you opt out of receiving marketing communications, we will remove your data from our marketing lists but may retain minimal information for compliance purposes (such as opt-out records).
- 9.4. In all other cases, we will keep your personal data for no longer than necessary to fulfill the purpose for which it was collected. Once the purpose is fulfilled, or you request to withdraw your consent we will securely delete or anonymize your personal information unless we are required to retain it for legal or regulatory reasons. Once the retention period for your personal data has expired, we will either securely delete or anonymize it in a manner that ensures it cannot be reconstructed or used for any future purposes.
- 9.5. You have the right to request the deletion or anonymization of your personal data if you believe it is no longer necessary for the purposes for which it was collected, or if you withdraw your consent.

## **10. CONFIDENTIALITY AND THE SECURITY**

- 10.1. We are committed to ensuring the confidentiality and security of the personal information entrusted to us. To safeguard your personal data, we have put in place appropriate information security measures, policies, and technical protocols to protect it from unauthorized access, misuse, disclosure, modification, destruction, or accidental loss.
- 10.2. We employ industry-standard security measures, such as encryption, firewalls, secure servers, and regular system updates, to ensure that your personal information is kept safe. These measures are designed to protect the integrity, confidentiality, and availability of your data throughout its lifecycle.
- 10.3. Access to personal data is strictly controlled and limited to authorized personnel only. We ensure that only those individuals who need access to personal information to perform their

duties are granted such access. Employees, consultants, contractors, and other third parties who have access to personal data are required to maintain confidentiality and follow our security policies.

- 10.4. We may engage third-party data processors who handle personal data on our behalf for specific purposes such as IT support, analytics, or marketing services. These third parties are contractually obligated to maintain the confidentiality and security of your personal information. We ensure that such third parties implement adequate security measures and only process personal data in accordance with our instructions and applicable data protection laws.
- 10.5. In the unlikely event of a data breach, we have established procedures to respond swiftly to mitigate any harm. If your personal information is compromised, we will notify you as soon as reasonably possible, in line with applicable regulations, and take appropriate action to minimize the risks.
- 10.6. We retain your personal information only for as long as necessary to fulfill the purposes outlined in this Privacy Policy. When it is no longer needed, we ensure that your data is securely deleted or anonymized to prevent unauthorized access or use.
- 10.7. All our partners, employees, consultants, and contractors who have access to personal data are bound by confidentiality agreements and are required to adhere to our privacy and data protection standards. These obligations extend to anyone involved in processing or handling personal information, ensuring that confidentiality is maintained at all stages of data processing.
- 10.8. We adhere to relevant data protection laws, and take all reasonable steps to ensure that personal data is handled in a lawful, fair, and transparent manner.

By maintaining these stringent confidentiality and security measures, we aim to provide you with the highest level of protection for your personal data.

## **11. HOW TO ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS**

As an individual whose personal information we process, you have several important rights under applicable data protection laws, including the the General Data Protection Regulation (GDPR). These rights allow you to manage and control how we process your personal information.

### **11.1. Your Right of Access**

You have the right to request access to the personal information we hold about you. If you make such a request, we will confirm whether we are processing your personal information and, if so, provide you with a copy of that personal information. Along with this, we will also provide certain other

details about the processing, such as the purpose and the recipients of the data. If you require additional copies, we may charge you a reasonable fee to cover the costs of providing them.

To exercise this right, please contact us at the details provided in the "Contact Us" section of this policy.

#### 11.2. Your Right to Rectification

If you believe that the personal information we hold about you is incorrect or incomplete, you are entitled to request that we correct or update it. We are committed to ensuring that the data we process is accurate and up to date. If we have shared your personal information with third parties, we will inform them of the rectification, where possible. Additionally, if you request, we will provide you with the names of those third parties, so you can contact them directly regarding the rectification.

To request a rectification, please provide the correct information and contact us directly.

#### 11.3. Your Right to Erasure

In certain circumstances, you have the right to request the deletion or removal of your personal information from our systems. This may apply when we no longer need to process your personal data, or if you withdraw your consent (where applicable) for us to process your data. If you are entitled to erasure, we will notify any third parties with whom we have shared your data about the erasure, where possible. Additionally, if you request, we will provide you with the names of those third parties, so you can contact them directly regarding the deletion of your data.

Please note that this right may not apply in all situations, such as when we are legally required to retain your data.

#### 11.4. Your Right to Restrict Processing

You have the right to request that we limit the processing of your personal information in certain circumstances, such as when you dispute the accuracy of your personal data, or if you have objected to our processing. Restricting processing means we can keep your data but limit how we use it. If you are entitled to restriction, and we have shared your personal information with others, we will notify them of the restriction, where possible. You can also request details about the third parties we have shared your data with.

To exercise this right, please contact us with the specific information about the data you would like restricted.

## 11.5. Your Right to Data Portability

In certain situations, you have the right to request that we provide your personal data in a structured, commonly used, and machine-readable format. You can use this data elsewhere or ask us to transfer it directly to another third party of your choice, where technically feasible. This right only applies to personal data you have provided to us, and the processing must be based on your consent or contractual necessity.

If you would like to exercise this right, please contact us, and we will assist you in the process.

## 11.6. Your Right to Object

You have the right to object to our processing of your personal information, particularly if we are relying on our legitimate interests (or those of a third party) as the legal basis for processing, except where we can demonstrate compelling legal grounds for the processing. You also have the right to object to the processing of your data for direct marketing purposes. If you object to processing for direct marketing, we will stop using your personal data for that purpose.

To object, simply notify us in writing, specifying the data processing activities you wish to object to.

## 11.7. Your Right to Withdraw Consent

If we rely on your consent (or explicit consent) as the legal basis for processing your personal information, you have the right to withdraw that consent at any time. This withdrawal will not affect the lawfulness of any processing we conducted based on your consent before its withdrawal. To withdraw your consent, please contact us, and we will promptly cease processing your data for the purposes for which you initially provided consent.

## 11.8. Your Right to Lodge a Complaint with the Supervisory Authority

If you believe that we have not processed your personal information in accordance with applicable data protection laws, you have the right to lodge a complaint with a supervisory authority.

In accordance with the General Data Protection Regulation (GDPR), you may submit your complaint to the data protection authority in the Member State of your habitual residence, place of work, or the place of the alleged infringement. A list of EU supervisory authorities and their contact details is available on the website of the European Data Protection Board (EDPB): [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

We encourage you to contact us first using the contact details provided in Section 3 of this Privacy Policy so that we may address your concerns directly and attempt to resolve the matter in a timely and satisfactory manner.

#### 11.9. Limitations on Your Rights

While we respect your rights, please note that there are some limitations. We may not be able to fulfill all requests if we have an overriding interest or legal obligation to continue processing your data, or if the data is subject to legal professional privilege or other confidentiality obligations. Additionally, some rights may not apply in certain situations, such as when processing is necessary for the establishment, exercise, or defense of legal claims.

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

We may make changes to this Privacy Policy from time to time to reflect changes in our practices, services, or legal requirements. It is important for us to keep you informed about how we use your personal information, and as such, we will update this Privacy Policy whenever there are significant changes to the way we collect, use, or share your personal data.

To ensure transparency, we will update this Privacy Policy to reflect any changes in the way we handle your personal information. The updated version of the Privacy Policy will be published on our website, and the «Effective Date» at the top of the document will indicate when the changes came into effect. We encourage you to check this page periodically to stay informed about how we manage your personal data.

In addition to internal policy changes, we may also revise this Privacy Policy to comply with changes in applicable laws, regulations, or best practices related to personal data protection. These changes may be necessary to ensure continued compliance with laws of the Republic of Poland, as well as any other applicable privacy laws or regulatory requirements.