

PRIVACY POLICY

The present Privacy Policy (“**Policy**”) of the operator of the crowdfunding platform “Crowdpear” - UAB Crowdpear (code of legal entity: 305888586, seat address: Kareiviu g. 11B, Vilnius, Lithuania) (“**Company**”) defines the basic conditions for the processing of personal data of visitors to the Company's website, customers, their representatives and beneficiaries and candidates for job positions (“**You**”) offered by the Company.

The present Policy has been prepared in accordance with:

- The General Data Protection Regulation;
- The Law on Legal Protection of Personal Data of the Republic of Lithuania;
- The Law on Electronic Communications of the Republic of Lithuania; and
- Other legislation, instructions and recommendations of supervisory authorities applicable to the Company, its crowdfunding activities and the provision of such services.

All supplements and updates of the present Policy are in all cases published in the website of the Company.

If you have any questions regarding your personal data protection or provisions of the present Policy, please contact the Company by email at info@crowdpear.com.

WHAT ARE THE PURPOSES AND SCOPE OF YOUR PERSONAL DATA PROCESSING BY THE COMPANY?

Please note that the Company processes your personal data for the purposes and scope indicated below, i. e.:

Purpose and basis of data processing	Scope of data processing, source, storage periods
<p>For the purpose of providing the crowdfunding services (in accordance with the Law on Crowdfunding of the Republic of Lithuania) and for the purposes related to the provision of crowdfunding services:</p> <ul style="list-style-type: none"> • Implementation of money laundering and terrorist financing prevention requirements provided for in the applicable legislation and the Company's internal policies; • Collection of debts owed to the Company or the Company's customers in accordance with concluded contracts; • Implementation of other requirements applicable to the Company's activities. 	<p>The Company processes the personal data of customers, their representatives and beneficiaries for the specified purposes:</p> <ul style="list-style-type: none"> • Personal identification data (name, surname, personal code, personal image, citizenship, etc.); • Contact details (residential address, email address, phone number, etc.); • Data that the client (its representative) uses to log in to the client's account on the Company's website (client user ID, password, etc.); • Financial data (financial obligations, personal credit rating, income, data on property, loans, information about transactions concluded on the Company's platform, their scope, etc.); • Data on the knowledge and experience of the client (investor) in the field of investment; • Data on the data subject's relationships with legal entities (position in the represented company, data on a person's participation in the control of legal entities, etc.);

	<ul style="list-style-type: none"> • Other data necessary to provide the Company's services. <p>The Company receives these personal data directly from you (when you provide them) and/or from other sources (for instance, state databases, such as the systems administered by SE "Centre of Registers", etc.).</p> <p>The personal data collected for the purpose of providing the crowdfunding services is stored for 10 years from the date of execution of the transaction, submission of the relevant application or execution of the transaction, unless the legislation establish longer storage periods for such data.</p>
<p>For the purpose of statistics (in accordance with the Law on Crowdfunding)</p>	<p>The Law on Crowdfunding establishes a requirement for the Company to publish statistical data on the provided crowdfunding services on its website, therefore, your personal data is processed to implement this requirement:</p> <ul style="list-style-type: none"> • Information about the number of concluded transactions; • Information about the amount of investments; • Other statistical information required to be processed by legislation applicable to the Company's activities. <p>In all cases, your data specified above is processed without leaving the possibility of identifying a specific data subject, i. e., your personal data is depersonalized.</p> <p>The storage period of the relevant personal data depends on the requirements of the applicable legislation regulating the Company's obligation to publish the statistical data.</p>
<p>For the purpose of administration of your candidacies for job positions offered by the Company (in accordance with your consent)</p>	<p>If you apply for a job position offered by the Company, your personal data is submitted together with your application (for instance, CV, motivational letter) will be processed on the basis of your consent that you express by submitting your personal data.</p> <p>We ask that you comply with at least the minimum data protection requirements when submitting the candidacies. Do not provide excess information that is not related to your candidacy for current or future selections.</p> <p>The storage period of the above-mentioned data always depends on the duration of the ongoing selection for a specific job position. After the end of this period, your personal data will continue to be processed only after you express your separate consent.</p>
<p>For the purpose of administering your requests (in accordance with the legitimate interest of the Company or legal obligation applicable to the Company)</p>	<p>When you contact the Company (by email, telephone, by submitting requests through social network accounts or in any other way), your provided personal data will be processed for the purpose of administering the relevant requests.</p> <p>These data are processed to ensure the quality of the provided services, to defend the legitimate interests of the Company and to fulfil the requirements of the applicable legislation; therefore,</p>

	<p>the basis for processing the relevant data is usually the Company's legitimate interest or the Company's legal obligation.</p> <p>Please ensure your compliance with at least the minimum requirements for the protection of personal information when making inquiries to the Company – do not provide excess personal data that are not necessary for the processing of an inquiry, complaint, letter or request.</p> <p>Your personal data submitted together with requests are stored for up to 3 years, unless the legislation establishes a different storage period or the longer data storage is determined by the need to protect the rights and interests of the Company or other persons.</p>
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WHAT COOKIES ARE USED IN THE COMPANY'S WEBSITE?

When you visit the Company's website (www.crowdpear.com), such data as your IP address and other network data may be collected with the help of cookies and/or similar technological solutions based on your provided consent.

The cookies are small files sent to the internet browser used and stored on your device (for instance, computer or phone). The cookies are transferred to your computer when you visit our website for the first time and our website can "remember" your actions, options, and operations with their help for a certain period of time.

Thus, the purpose of cookies is to ensure the convenient and safe operation of the website, as well as to analyse the habits of website visitors. This allows us to adapt the website to the needs of its visitors better. Some types of cookies (necessary and analytical cookies) are required for the proper functioning of the website, so if these cookies are refused, the website may not function properly.

According to their duration, the cookies are divided into short-term session cookies (deleted after the visitor ends the browsing session) and long-term cookies (stored for longer period). Cookies can also be classified by whether they belong to the first party (for instance, website administrator) or other – third party (for instance, online advertising organisers).

Our website uses the below cookies:

Cookie category	Cookie name	Cookie validity period	Cookie description
Analytical	_ga	1 year	Part of Google Analytics used to distinguish unique users.
Analytical	_gid	24 hours	Part of Google Analytics used to distinguish unique users.
Analytical	fbp	1 day	The cookies of the third party – Facebook; they provide information to Facebook about the websites visited and for the display of advertisements on the Facebook social network and their products.
Functional	CookiePolicyClosed	1 year	Used to store the consent to the use of cookies.
Functional	access_token	1 month	The cookie is used to store and identify a unique user access identifier ID to manage the user's session on the website.

Functional	refresh_token	1 month	The cookie is used to store and identify a unique user access identifier ID to manage the user's session on the website.
Analytical	_ym_uid	1 year	The cookie set by Jivosite.
Analytical	_ym_d	1 year	The cookie set by Jivosite.
Analytical	OptanonConsent	6 days	The cookie set by Trustpilot.
Analytical	tp-consumer-id	5 days	The cookie set by Trustpilot.
Analytical	OptanonAlertBoxClosed	5 days	The cookie set by Trustpilot.
Analytical	RequestVerificationToken	Until the end of browsing session	The cookie set by Trustpilot.
Analytical	jwt	5 days	The cookie set by Trustpilot.

You can control the use of cookies by changing your internet browser settings. Every browser is different, so if you do not know how to change your cookie settings, we recommend you to read its user manuals and instructions.

If you do not want cookies to collect information, you can refuse the use of cookies in the browser settings. However, certain cookies (for example, essential cookies) are necessary for the proper functioning of the website, so if these cookies are refused, the website may lose its functionality. More useful information about the cookies, their control and cancellation is provided in the website www.allaboutcookies.org.

WHERE THE COMPANY MAY TRANSFER YOUR PERSONAL DATA?

In the course of its activities, the Company may use certain data processors (service providers, for instance, companies providing data storage services, companies developing and supporting software, companies providing debt administration services, companies providing communication services, etc.). Some of your personal data may be transferred to relevant persons, but we ensure that your personal data is transferred to relevant persons only in such cases and only to the extent that it is necessary for the provision of their respective services.

The recipients of your personal data may also be the following persons or institutions:

- (1) The payment and other service providers and financial institutions whose services the Company uses in the course of its activities;
- (2) The entities administering the joint data files of borrowers (for instance, UAB "Creditinfo Lietuva", UAB "Scorify", etc.);
- (3) State authorities and registers (Bank of Lithuania, Department of Statistics, notaries, courts, bailiffs, law enforcement authorities, attorneys, etc.);
- (4) Other third parties related to the provision of the Company's services and/or having a legal basis to receive this data.

In any case, the Company ensures maximum reasonable efforts to protect the personal data from losing or using in illegal ways while implementing the requirements of legislation.

The Company takes care of the confidentiality of your information and implements various technical and organizational security measures to protect your information. Please note that no means is completely secure and cannot guarantee the protection against all possible security breaches at any given time.

DOES THE COMPANY TRANSFER YOUR PERSONAL DATA OUTSIDE EU / EEA?

It is not necessary to transfer your personal data to recipients located outside the European Union (EU) / European Economic Area (EEA) for the company's operations.

However, if in exceptional cases, part of your data must be transferred to a data recipient located outside the EU/EEA, we guarantee that all the requirements laid down in the General Data Protection Regulation will be implemented and reasonable measures will be taken to ensure the security of this transferred data.

WHAT ARE YOUR RIGHTS AS DATA SUBJECTS?

You have the following rights as data subjects:

- (1) To access your personal data and learn how they are processed;
- (2) To revoke the given consent to the processing of your personal data;
- (3) To request the deletion of your personal data;
- (4) To request the correction of incorrect, inaccurate or incomplete data;
- (5) To request the transfer of your personal data to another data controller or provide it directly in a form convenient for you;
- (6) To request the restriction of the processing of your personal data;
- (7) To disagree with the processing of your personal data if they are processed on the basis of legitimate interest.

To exercise your rights as a data subject, please contact us in writing (email: info@crowdpear.com) and:

- (1) Provide the specific right you wish to exercise;
 - (2) Detail its scope of exercise;
 - (3) Provide your contact details (for instance, name, surname, email address registered on our platform and phone number).
2. If there is not enough information to analyse your request properly, we will contact you immediately. Please note that we exercise your rights as a data subject in accordance with the General Data Protection Regulation, other legislation regulating the protection of personal data and the guidelines of competent authorities.
 3. If you believe that your personal data is being processed illegally or in breach of your rights related to the processing of personal data, you have the right to contact the State Data Protection Inspectorate.
 4. However, prior to contacting the State Data Protection Inspectorate, we encourage you to contact the Company first (email: info@crowdpear.com). Thus, we will be able to find the most effective and optimal solution to the problem for both parties.

Our website uses Google reCAPTCHA to protect our forms from spam and abuse. By using reCAPTCHA, we are able to ensure that only human users are able to submit forms on our website. reCAPTCHA uses an advanced risk analysis engine and adaptive CAPTCHAs to keep automated software from engaging in abusive activities on our website. Google reCAPTCHA may collect data such as IP addresses, user-agent information, unique identifiers, cookies, and mouse movements to distinguish between human users and bots. It does this while letting your valid users pass through with ease. Google reCAPTCHA is a third-party service provided by Google LLC. By using reCAPTCHA, you are subject to Google's privacy policy and terms of use. Google may use the information collected by reCAPTCHA to improve its own services. reCAPTCHA sets a necessary cookie (`_GRECAPTCHA`) when executed for the purpose of providing its risk analysis. If you would like to learn more about Google reCAPTCHA and Google's privacy policy, please visit the Google reCAPTCHA website and the Google Privacy Policy.