

**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, candidates for job positions offered by the Company and employees (“**You**”).

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](mailto: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 Regulation and other legal acts) and for the purposes related to the provision of crowdfunding services:</p> <ul style="list-style-type: none"> <li>• Implementation of money laundering and terrorist financing prevention requirements provided for in the applicable legislation and the Company's internal policies;</li> <li>• Collection of debts owed to the Company or the Company's customers in accordance with concluded contracts;</li> <li>• Implementation of other requirements applicable to the Company's activities.</li> </ul>	<p>The Company processes the personal data of <b>Clients (Investors and Project owners) their representatives and beneficiaries</b> for the specified purposes:</p> <ul style="list-style-type: none"> <li>• Personal identification data (name, surname, personal code, personal image, citizenship, etc.);</li> <li>• Contact details (residential address, email address, phone number, etc.);</li> <li>• 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.);</li> <li>• Financial data (financial obligations, personal credit rating, income, data on property, loans, information about transactions concluded on the Company's platform, their scope, etc.);</li> <li>• Data on the knowledge and experience of the Client (Investor) in the field of investment;</li> <li>• Data collected during the reliability assessment of the Project owner;</li> <li>• Data on the progress of the Project realization and documents proving the proper use of the funds provided to the Project owner;</li> </ul>

	<ul style="list-style-type: none"> <li>• Documents and data related to the property pledged by the Project owner and other security measures provided;</li> <li>• 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.);</li> <li>• Other data necessary for the purpose of providing the crowdfunding services.</li> </ul> <p>The Company receives this personal data directly from You (when You provide personal data) and/or from other sources (for instance, state databases, such as the systems administered by SE "Centre of Registers", etc.).</p> <p>Personal data collected for the purpose of providing crowdfunding services are stored for the terms set out in the table in the Annex, except for cases where legal acts establish longer storage terms 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, personal data of Data subject is processed to implement this requirement:</p> <ul style="list-style-type: none"> <li>• Information about the number of concluded transactions;</li> <li>• Information about the amount of investments;</li> <li>• Other statistical information required to be processed by legislation applicable to the Company's activities.</li> </ul> <p>In all cases, data specified above is processed without leaving the possibility of identifying a specific Data subject, i. e., 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 submitted candidacies for job positions offered by the Company (according to Your consent)</p>	<p>If You apply for a job position offered by the Company, You submit personal data (e.g. CV, motivation letter) together with the application, which will be processed on the basis of Your consent, which You express by submitting this personal data.</p> <p>Applying for a position, we ask You to comply with at least the minimum data protection requirements. Company asks You not to provide redundant information that is not related to Your candidacy for current or future selections.</p> <p>The term of storage 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, the personal data of You will continue to be processed only after You have given separate consent.</p>

<p>For the purposes of concluding employment contracts and other contracts, fulfilling contractual obligations, accounting</p>	<p>The Company collects and processes the following data for the purposes of concluding employment contracts and agreements, fulfilling contractual obligations, and accounting:</p> <ul style="list-style-type: none"> <li>• names and surnames of employees;</li> <li>• residential addresses of employees;</li> <li>• birth dates and/or personal identification numbers of employees;</li> <li>• information about the employee's marital status;</li> <li>• employees' bank account numbers to which wages are deposited;</li> <li>• employees' personal telephone numbers, personal e-mail addresses;</li> <li>• Names and surnames, positions and telephone number, e-mail address of clients, business partners' managers, authorized persons, contact persons and/or persons responsible for the fulfilment of contractual obligations, the client (if it is a natural person) or his representative (if it is a legal person) ) name, work address, work phone number, work e-mail address.</li> </ul>
<p>For the purpose of ensuring suitable working conditions</p>	<p>In order to ensure suitable working conditions, the Company, with the employee's consent, processes information related to the employee's health condition, which directly affects the employee's work functions and the ability to perform them in accordance with the procedure established by legislation.</p>
<p>For the purpose of preparing commercial offers, as well as to ensure the legitimate interest of the Company</p>	<p>For the purpose of preparing commercial offers, as well as in order to ensure the legitimate interest of the Company, the Company collects and processes all necessary data, but not in a larger volume and not longer than is necessary to achieve the goal.</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), provided personal data will be processed for the purpose of administering the relevant requests.</p> <p>This data is 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, the basis for processing the relevant data is usually the Company's legitimate interest or the Company's legal obligation.</p> <p>You are required to ensure Your compliance with at least the minimum requirements for the protection of personal information when making inquiries to the Company – You must not provide excess personal data that is 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</p>

determined by the need to protect the rights and interests of the Company or other persons.
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## WHAT COOKIES ARE USED IN THE COMPANY'S WEBSITE?

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

Cookies are small files sent to the Internet browser used and stored on your device (for instance, computer or phone). 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, cookies are used to ensure the convenient and safe operation of the website and to analyze visitors' habits. This allows us to better adapt the website to visitors' needs. Some types of cookies (necessary and analytical cookies) are required for the website's proper functioning, so if these cookies are refused, the website may not function properly.

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

Our website uses the cookies below:

Cookie category	Cookie name	Cookie validity period	Cookie description
Analytical	_ga	1 year	Part of Google Analytics is used to distinguish unique users.
Analytical	_gid	24 hours	Part of Google Analytics is used to distinguish unique users.
Analytical	_fbp	1 day	The cookies of the third party, Facebook, provide information to Facebook about the websites visited and allow 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	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	Session	The cookie set by Trustpilot.

Analytical	jwt	5 days	The cookie set by Trustpilot.
Necessary	test_cookie	1 day	Used to check if the user's browser supports cookies. The cookie is set by Google.
Necessary	__jid	Session	It is used to add comments to the website and remember the user's Disqus login credentials across websites that use said service. The cookie is set by c.disquscdn.com.
Necessary	disqusauth	Session	Registers whether the user is logged in. This allows the website owner to make parts of the website inaccessible, based on the user's log-in status. The cookie is set by c.disquscdn.com.
Necessary	CookieConsent	1 year	Stores the user's cookie consent state for the current domain.
Necessary	persist:root	Persistent	This cookie stores visitor credentials in an encrypted cookie, allowing the visitor to stay logged in on re-entry if the visitor has accepted the 'stay logged in' button.
Preferences	aet-dismiss	Persistent	Necessary for the functionality of the website's comment system. The cookie is set by c.disquscdn.com.
Preferences	drafts.queue	Persistent	Necessary for the functionality of the website's comment system. The cookie is set by c.disquscdn.com.
Preferences	submitted_posts_cache	Persistent	Necessary for the functionality of the website's comment system. The cookie is set by c.disquscdn.com.
Preferences	i18nextLng	Persistent	Determines the visitor's preferred language and allows the website to set it upon the visitor's re-entry.
Statistics	td	Session	Registers statistical data on users' behavior on the website. Used for internal analytics by the website operator.
Statistics	_hjSession_#	1 day	It collects statistics on visitors' visits to the website, such as the number of visits, average time spent on the website, and what pages have been read. The cookie is set by Hotjar.
Statistics	_hjSessionUser_#	1 year	It collects statistics on visitors' visits to the website, such as the number of visits, average time spent on the website, and what pages have been read. The cookie is set by Hotjar.
Statistics	disqus_unique	Session	It collects statistics related to the user's visits to the website, such as the number of visits, average time spent on the website, and loaded pages. The cookie is set by c.disquscdn.com.
Statistics	sentryReplaySession	Session	Registers data on visitors' website behavior. This is used for internal analysis and website optimization.

Marketing	lastExternalReferrer	Persistent	Detects how the user reached the website by registering their last URL address. The cookie is set by Facebook.
Marketing	lastExternalReferrerTime	Persistent	Detects how the user reached the website by registering their last URL address. The cookie is set by Facebook.
Marketing	_fbp	3 months	Used by Facebook to deliver a series of advertisement products, such as real-time bidding from third-party advertisers. The cookie is set by Facebook.
Marketing	_ga	2 years	Used to send data about the visitor's device and behavior to Google Analytics. Tracks the visitor across devices and marketing channels. The cookie is set by Google.
Marketing	_ga_#	2 years	Used to send data about the visitor's device and behavior to Google Analytics. Tracks the visitor across devices and marketing channels. The cookie is set by Google.
Marketing	_gcl_au	3 months	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services. The cookie is set by Google.
Marketing	ads/ga-audiences	Session	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behaviour across websites. The cookie is set by Google.
Marketing	pagead/1p-conversion/##/	Session	Collects data on visitor behavior from multiple websites to present more relevant advertisements. This also allows the website to limit the number of times that visitors are shown the same advertisement. The cookie is set by Google.
Marketing	badges-message	Persistent	It collects data on the visitor's use of the website's comment system and what blogs/articles the visitor has read. This information can be used for marketing purposes. The cookie is set by c.disquscdn.com.
Marketing	images/pixel.gif	Session	Enables the visitor to share content from the website onto social media platforms or websites. The cookie is set by vglink.

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 read its user manuals and instructions.

If you do not want cookies to collect information, you can refuse their use in the browser settings. However, certain cookies (for example, essential cookies) are necessary for the website's proper functioning, so if these cookies are refused, the website may lose its functionality. The website [www.allaboutcookies.org](http://www.allaboutcookies.org) provides more useful information about cookies, their control, and their cancellation.

Crowdpear is using Cookiebot CMP (Consent Management Platform): <https://www.cookiebot.com/>

## **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, the validity of disagreement is assessed in each specific case in accordance with the requirements of legal acts.

To exercise your rights as a data subject, please contact us in writing (email: [info@crowdpear.com](mailto: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](mailto: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 can ensure that only human users can 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. To distinguish between human users and bots, Google reCAPTCHA may collect data such as IP addresses, user-agent information, unique identifiers, cookies, and mouse movements. 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 to provide 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.