

PRIVACY POLICY

(Valid as of November 19, 2018)

(Revised March 12, 2020)

CreamWise Inc. and Solfin.net Inc. each complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. CreamWise Inc. and Solfin.net Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

In addition, CreamWise Inc. and Solfin.net Inc. commit to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities with regard to unresolved Privacy Shield complaints concerning data transferred from the EU.

Dear Customer,

Our goal is to make money available in a fair, simple and understandable way. On this page, in the Privacy Policy section you will learn what information we collect about you, what we do with it and when we disclose it to other entities. We want to ensure that your personal data is protected, and the Privacy Policy is regularly improved. Information about any changes to the Privacy Policy you will receive in an e-mail and the latest and valid version of it is in the "About us" tab.

To the extent that your personal data are used to process the loan application (including automated profiling that is used to perform the credit assessment), the conclusion of a contract, and also when it happens - in activities related to securing claims, processing complaints and actions vindication - the administrator of your personal data is the Creditor: KIM Finance Sp. z o.o., with its seat in Warsaw at 86/410 Hoża St., 00-682 Warsaw, KRS number 0000600780 or MDP Finance Sp. z o.o. with its seat in Warsaw at 87 Grzybowska St., 00-844 Warsaw, KRS number 0000600366.

In the context of your personal data processed for marketing purposes (transmission of commercial information by electronic means, direct marketing using telecommunications terminal equipment, personalization of offers and commercial content), the co-administrators are Creamfinance Poland Sp. o.o. with its seat in Warsaw at 134 Al. Jerozolimskie, 02-305 Warsaw, KRS number 0000453034, KIM Finance Sp. z o.o., with its seat in Warsaw at 86/140 Hoża St., 00-682 Warsaw, KRS number 0000600780, MDP Finance Sp. z o.o. with its seat in Warsaw at 87 Grzybowska St., 00-844 Warsaw, KRS number 0000600366.

Your personal data will be processed to the extent that it is necessary to take action before the conclusion of the contract and necessary for the loan agreement,

and necessary to fulfill legally justified goals realized by the administrator and necessary for the implementation of rights and obligations determined by law, including specified in the Act of 12 May 2011 on Consumer Credit (Journal of Laws No. 126, item 715, as amended) and archival obligations. In addition, if you give your consent, we will use your data for the marketing purposes mentioned above.

If you have any questions regarding the processing of your personal data and your rights, please contact our Data Protection Officer by e-mail to the following address: iod@creamfinance.pl

To the extent that your personal data are used to process the loan application (including automated profiling that is used to perform the credit assessment), the conclusion of a contract, and also when it happens - in activities related to securing claims, processing complaints and actions vindication - the administrator of your personal data is the Creditor: SIA "Creamfinance Latvia", registration No.: 40103283854, address: Uriekstes iela 2a-24, Rīga, LV – 1005, website: www.crediton.lv. You can find the Privacy Policy at <https://www.crediton.lv/par-mums/privatuma-politika> .

In the context of your personal data processed for marketing purposes (transmission of commercial information by electronic means, direct marketing using telecommunications terminal equipment, personalization of offers and commercial content), the controllers are CreamWise Inc. and Solfin.net Inc.

Table of Contents

- 1. How do we collect information about you?**
- 2. Purposes of processing and the legal basis for processing.**
- 3. How long do we keep information about you?**
- 4. How do we analyse information about you?**
- 5. Who do we disclose your personal information to?**
- 6. How do we protect your personal data?**
- 7. What are your rights?**
- 8. Who can you turn to for help?**

1. How do we collect information about you?

We collect information about you in several ways:

- You use our website or enter information about yourself;
- You fill out a loan application or repay the loan;
- Third parties provide us with information about you on the basis of your authorizations or on the basis of generally applicable laws;
- You are talking to us on the phone.

1.1. Information provided by you:

- name, surname, PESEL number, ID number;
- marital status;
- address of your residence with information from which year;
- cell phone number;
- e-mail address;
- recordings from telephone conversations;
- profession;
- range of monthly income;
- range of monthly expenses;
- bank account number;
- employer;
- additional contact information;
- bank account statement for the last 12 months.
- information on repayment of the loan

1.2. Information we receive about you

- Credit history

In accordance with the Act of 12 May 2011 on Consumer Credit, before concluding a consumer credit agreement, i.e. upon receipt of your loan application, we are required to assess your creditworthiness. The assessment of creditworthiness is made on the basis of information obtained from you, as well as on the basis of information obtained from relevant databases of credit and economic information bureaus or data sets of the creditor.

- Activity on our website

In order to improve the quality of our services and faster operation of our website, and thus the speed of the credit process, together with partners cooperating with us, we collect cookies.

Cookies are small pieces of information, sent by a website that you visit, and then they are saved on the end device (computer, laptop, smartphone) that you use when browsing the web.

Cookies allow you to use our services in an optimal way, because based on your behaviour on our website we have the ability to personalize messages and offers sent to you. Cookies allow us to obtain information about the websites you visit, thanks to them we measure the effectiveness of advertising campaigns and search engines and provide us with insight into the behaviour of users of our website, so that we can improve our communication with the customer and products. If you want to disable cookies, contact your browser vendor to learn how to do this.

Because cookies are used on our websites, disabling them may prevent you from using certain parts of websites.

We use the following categories of cookies on our websites:

Category 1 - Required cookies

Cookies are essential so that you can browse our websites and use their functions. Without these cookies, we would not be able to provide services such as: registration, loan application and logging into the customer zone.

Category 2 - Performance cookies

Performance cookies collect information about how you use our websites - for example which websites you visit most often. This data can be used to optimize our websites and to facilitate navigation.

This type of cookies is used in the Partner Programs to identify if registration has occurred from the transition from any of the websites represented in the Program, with a view to determining whether this registration or purchase occurred, which involves payment of remuneration for the site that contributed to this.

These cookies' files do not collect information identifying the user. All collected information is aggregated and therefore it is anonymous.

Category 3 - Functional cookies

This type of cookies allows to remember the choices you made when browsing our websites. The information collected by these cookies does not identify you and cannot track your browsing activity on sites other than ours.

1.3. Information we receive about you

We receive information from partners cooperating with us about your telephone number from which you have called our Customer Service Department. We also receive data about the device through which you log in to our website and information about your visits on the website. For example, unified resource URLs, clicks with dates and times, your views and searches, pages with reference / output information, files displayed on our site, download errors, page display times for certain sites, page response times, interaction information on the page (such as scrolling, clicks and mouse redirects) and methods used to navigate from page, date / time stamps and / or click stream data, Internet Protocol (IP) address and Internet Service Provider (IPS), device type, browser type and version, login information, type and version of the browser plugin, operating system and platform, setting of time zone.

2. Cele przetwarzania oraz podstawa prawna przetwarzania.

The type of data	Processing purpose	Legal basis	Will you be granted a loan if you do not provide us with this information?	Are you allowed to ask for the correction of this information?
Name, surname, PESEL number, bank account number, mailing address	Consideration of the loan application; conclusion of a consumer credit agreement; anti-money laundering control	<ul style="list-style-type: none"> • Art. 3 of the Act of 12 May 2011 on Consumer Credit • Art. 6 par. 1 lit. b of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (hereinafter: RODO) • Art. 9 section 1 point 1 of the Act of 16 November 2000 on Counteracting Money Laundering and Financing of Terrorism • Art. 23 section 1 of the Act of 29 August 1997 on the Protection of Personal Data 	No	Yes
Information about your income, expenses, profession, employer	Credit rating; credit risk analysis; profiling; conclusion of a consumer credit agreement	<ul style="list-style-type: none"> • Art. 9 of the Consumer Credit Act • Art. 6 section 1 lit. c of RODO • Art. 22 section 2 lit. a of RODO 	No	Yes
Information on bank account	Credit rating; conclusion of a consumer credit agreement	<ul style="list-style-type: none"> • Art. 9 of the Consumer Credit Act • Art. 6 section 1 lit. c of RODO • Art. 23 section 1 of the 	No	Yes

		Act on the Protection of Personal Data		
Audio recordings from telephone conversations	Loan service; performance of the contract	<ul style="list-style-type: none"> • Art. 9 of the Consumer Credit Act • Art. 6 section 1 lit. b of RODO • Art. 9 section 2 lit. a of RODO • Art. 23 section 1 of the Act on the Protection of Personal Data 	No	No
Information about devices used during registration on our website	Credit rating, customer identification; conclusion of a consumer credit agreement.	<ul style="list-style-type: none"> • Art. 9 of the Consumer Credit Act • Art. 6 section 1 lit. b of RODO • Art. 23 section 1 of the Act on the Protection of Personal Data 	No	No
Information obtained from the data sets of credit and economic information bureaus	Credit rating; credit risk analysis; conclusion of a consumer credit agreement.	<ul style="list-style-type: none"> • Art. 9 of the Consumer Credit Act • Art. 59b section 3 of the Consumer Credit Act • Art. 105 of the Act of 29 August 1997 – The Banking Law • Art. 6 section 1 lit. c of RODO • Art. 6 section 1 lit. a of RODO • Art. 23 section 1 of the Act on the Protection of Personal Data 	No	No
Name, last name, PESEL, e-mail address, telephone number	Forwarding of advertisements and offers; direct marketing; sending commercial information by electronic means	<ul style="list-style-type: none"> • Art. 6 section 1 lit. a of RODO • Art. 172 of the Act of 16 July 2004 -- Telecommunications law • Act of 18 July 2002 on the Provision of Electronic Services • Art. 23 section 1 of the Act on the Protection of Personal Data 	Yes	Yes

Name, last name, contact details, loan agreement, payments made, recordings of telephone conversations	Debt collection (out of court and judicial)	<ul style="list-style-type: none"> • Art. 6 section 1 lit. f of RODO • Legally legitimate interest of the creditor • Claiming payment • Art. 23 section 1 of the Act on the Protection of Personal Data 	No	Yes
--	---	---	----	-----

3. How long do we retain information about you?

- We will store your personal information that you indicate when you apply for a loan and when you pay it back, until the entire liability is repaid.
- We will store personal data that you have provided to us on the basis of your consent until this consent is revoked.
- We will store personal data provided by you in the loan application pending completion of the verification and conclusion of the contract or rejection of the loan application.
- In the case of a consumer loan agreement, we will process your personal data for the purposes of the performance of the contract, until the framework contract is in force, subject to the abovementioned and below deadlines.
- For the purpose of assessing creditworthiness and credit risk analysis, including using profiling, your personal data will be processed no longer than for 5 years after the liability to the Creditor resulting from the concluded consumer credit agreement, the Creditor's sale of receivables under the contract for consumer credit or termination of a consumer loan agreement.
- For the purpose of considering potential complaints and claims, your data will be processed until the potential claims under the contract or otherwise expire.
- We will process personal data that you provided to us on the basis of granted consent for the purposes of direct marketing carried out using telecommunications terminal equipment and automated calling systems until you withdraw your consent.
- We will process personal data that you have provided to us based on your consent for the purpose of sending commercial information by electronic means until you withdraw your consent.
- For purposes of verification of creditworthiness and credit risk analysis in connection with the disclosure of data to:
 - o Economic Information Bureau InfoMonitor S.A. with its seat in Warsaw at 77 Jacka Kaczmarskiego St., 02-679 Warsaw,
 - o ERIF Economic Information Bureau S.A. with its seat in Warsaw at 2 Plac Bankowy, 00-095 Warsaw,

- o National Debt Register, Economic Information Bureau S.A. with its seat in Wrocław at 12 Danuty Siedzikówny St., 51- 214 Wrocław,
 - o Credit Information Bureau S.A. with its seat in Warsaw at 77a Jacka Kaczmarskiego St., 02-679 Warsaw,
 - o The National Economic Information Bureau S.A. with its seat in Kraków at 38 Lublańska St., 31-476 Kraków for a period of not longer than two years.
- For the purposes of creditworthiness verification and credit risk analysis, data in CRIF Services Sp. z o.o. based in Krakow at 38 Lublańska St., 31-476 Kraków, until you withdraw your consent.
 - For the purpose of the mandatory obligatory financial reporting, we will store your account for a period of five years.
 - For the purpose of conducting obligatory financial reporting, we will retain your personal data for a period of 5 years counted from the end of the accounting year.
 - Information obtained after verification as a result of applying financial security measures in accordance with the Act of 16 November 2000 on Counteracting Money Laundering and Financing of Terrorism, we will keep for 5 years after the loan repayment, beginning from the first day of the year following the year, which the transaction was carried out.
 - For the purpose of debt collection activities - until sales of claims to debt collection companies or prescription of your claims under the contract or otherwise in accordance with the civil law provisions.

4. How do we analyse information about you?

Credit rating

We make sure that you act in good faith and automatically evaluate your creditworthiness in order to provide you with a loan as soon as possible. This allows us to decide whether we will lend you money, how much and under what conditions. It is beneficial for you, because by considering individual information about you, we will adapt the terms of the loan to your needs. The process described below takes about 15 minutes.

The following automatic decision-making procedure is based on the requirements of the Act of May 12, 2011 on Consumer Credit, which requires us to give you a loan to assess your creditworthiness. Such action is necessary to conclude a loan agreement. Nevertheless, we would like you to know that you have the right to intervene with our employees in the form of an individual assessment of your creditworthiness, to express your own position and to challenge this decision. You have the right to contact us and ask our employee to review the decision regarding your loan application (see point 7).

In the process of granting a loan and determining the terms of a loan (drawing up a contract), we use an algorithm by means of which we analyse your data in four steps:

Step 1: We identify you.

We make sure that you act in good faith. We analyse information about the device you use to complete the registration form and information collected via online registration fields. In addition, we verify the validity of your e-mail address, telephone numbers and other data entered into the form. At this stage, we use the information provided by you and our co-operating partner Risk.Ident GmbH (50 Sandtorkai St, 20457 Hamburg, Germany, e-mail: contact@riskident.com). In addition, at this step we need to verify your identity. In order to identify, we suggest using an online service provided by our partner (Instantor) or paying a registration fee of 0.01 PLN specified in the Loan Agreement.

For example, if you are 17 years old, your application does not meet the age limits for borrowers, because you are not of legal age and we will not be able to lend you money.

If the information collected in Phase 1 does not give us any reason to doubt your credibility, the assessment algorithm moves on to step 2.

Step 2: We make sure that you have the funds to repay the loan.

We analyze information about your income and expenses. At this stage, we use the information provided by you in the registration form, as well as information about your debts, credit history and bank statement obtained from databases of debtors and from credit and economic information offices. In this way, we create your profile.

For example: If you are delaying your loan repayment, you are less likely to get a new loan. If for a long time you have been paying back the loan and you have not contacted us, unfortunately we will not be able to lend you money again.

If the information collected during step 2 does not indicate that we can not give you a loan, the rating algorithm goes to step 3.

If you want to know what information we receive from the credit and economic offices and debtors' databases, contact them:

- InfoMonitor S.A. Economic Information Office with its seat in Warsaw at 77 Jacka Kaczmarskiego St., 02-679 Warsaw,
- ERIF Economic Information Bureau S.A. with its seat in Warsaw at 2 Plac Bankowy, 00-095 Warsaw,
- Krajowy Rejestr Długów Economic Information Bureau S.A. with its seat in Wrocław at 12 Danuty Siedzikówny St., 51- 214 Wrocław,
- Credit Information Bureau S.A. with its seat in Warsaw at 77a Jacek Kaczmarski St., 02-679 Warsaw,
- National Economic Information Bureau SA with its seat in Krakow, 38 Lublańska St., 31-476 Kraków,
- CRIF Services Sp. z o.o. with its seat in Krakow at 38 Lublańska St., 31-476 Kraków.

Step 3: We calculate your creditworthiness

At this stage, we assess credit risk and your creditworthiness. Credit risk assessment is a mathematical formula that uses all previously collected information about you. The credit rating indicates your ability to repay the loan

and helps us ensure that you will be able to pay off your loan. A lower credit rating indicates a higher risk that you will not repay the loan and, therefore, a higher probability that we will refuse to give it.

Important parameters that affect your credit history:

- Existing liabilities - your credit rating is influenced by the amount of previously incurred liabilities and their relationship to your earnings. If the amount of monthly payments of liabilities is close to the income earned, then the credit assessment will be low. However, if your existing monthly commitments are a small part of your earnings, your credit score will increase.
- Historic payment delays - if you exceptionally delay your loan repayment by several days, this delay will not have a significant impact on your credit rating. However, if you are significantly delayed in paying off each loan, your credit score will decrease.
- Income - if your income is low and irregular, your credit rating will be decreased

Step 4: Expert opinion on your creditworthiness (in case of a systemic error occurrence or low credit rating)

If the previous steps indicate that you have made a mistake when completing the loan application or if your credit rating is low, our employees may call you to clarify any doubts that have arisen that may affect the final credit score. For example, we can ask you additional questions about your place of work and your address. Unfortunately, we will not be able to give you a loan if we can not reach you on the phone.

Advertisement

We offer all our clients the benefits of loyalty and loan repayment on time. For this purpose, you have the option of agreeing to send commercial offers to you. If you agree, we will present to you special offers, prepared on the basis of your profile, with regard to the timely repayment of the loan which was granted to you. You have the right to withdraw consent to receive offers and commercial information by electronic means (see point 7)

5. Who do we disclose your personal information to?

We disclose your personal information to credit bureaus, debtors' databases, companies that help us assess the risk of fraud and assess your creditworthiness. In addition, we provide information pertaining to your personal data to the payment service provider (for example to the bank) in order to transfer funds to your bank account.

Moreover, if you give your consent, we may disclose your personal information to companies that help us with our marketing activities.

We use various tools and services that are designed to facilitate our cooperation and accelerate communication. For this reason, we disclose your personal data to

such communication service providers as SerwerSMS Polska sp. z o.o. and VERCOM S.A. (Email Labs service). They help us to remind you about payment dates and send offers with new services. A company in our group - CreamFinance Austria GmbH - calculates your credit rating based on the information which has gathered about you.

If you do not repay the loan within the contractual deadline, we may send information about your debt to credit information bureaus and we will also consider the need to use debt collection services to recover your debt. In this case, your personal data will be processed in the legitimate interest of the creditor in order to enforce the claim. If we decide to forward an investigation of the payment of your debt to the debt collection service provider, the latter will be entrusted with your personal data such as: name, contact details, debt information, a copy of the loan agreement and any changes to it and information about all previous payments.

The personal data provided by you may be transferred on the basis of your authorization, in order to obtain business information, economic data or creditworthiness verification and credit risk analysis to:

- o Economic Information Bureau InfoMonitor S.A. with its seat in Warsaw at 77 Jacka Kaczmarskiego St., 02-679 Warsaw,
- o ERIF Economic Information Bureau S.A. with its seat in Warsaw at 2 Plac Bankowy, 00-095 Warsaw,
- o National Debt Register, Economic Information Bureau S.A. with its seat in Wrocław at 12 Danuty Siedzikówny St., 51- 214 Wrocław,
- o Credit Information Bureau S.A. with its seat in Warsaw at 77a Jacka Kaczmarskiego St., 02-679 Warsaw,
- o The National Economic Information Bureau S.A. with its seat in Kraków at 38 Lublańska St., 31-476 Kraków,
- o CRIF Services Sp. z o.o. based in Krakow at 38 Lublańska St., 31-476 Kraków

In addition, we are required to disclose information about the services provided to you, if such disclosure has a legal basis and is defined by applicable law. For example, to respond to requests from public authorities, to protect your rights, the rights of third parties, or to protect our rights.

6. How do we protect your personal data?

We apply technical and organizational measures that ensure protection of personal data being processed that is appropriate to the threats and categories of data protected. We secure your data against disclosure to unauthorized persons, change, loss, damage or destruction. We ensure confidentiality, integrity, availability and resilience of data processing systems and services. We regularly test, measure and evaluate the effectiveness of technical and organizational measures to ensure the security of processing your personal data in accordance with the law.

We limit access to your personal data only to employees who need to know this information to provide services to you. We also train our employees about the importance of confidentiality and ensuring privacy and security of processing of our Clients' personal data. We encrypt personal data contained in our systems as well as when we transfer them.

If we ever suspected that any of your personal information was lost and as a result it may have become available to third parties - you will receive an immediate personal notification from us.

WARNING! If you have not reached the age of 21, and yet you have completed the loan application, your personal data will be automatically deleted.

7. What are your rights?

We process your personal data, which is why you have the opportunity to find out what we do with them and how we process them, and in some cases ask us to process them to a smaller extent, or even withdraw consent to their processing. If you are our customer, we have prepared a My Rights section for your convenience in your Client profile, where you can ask questions about the processing of your data and make use of your legal rights.

Therefore, we have prepared a summary of your rights for you:

- you have the right to access your data and the right to demand their rectification or deletion of processing,
- you have the right to transfer personal data, i.e. to receive from your administrator your personal data, in a structured, commonly used machine-readable format, so that you can send this data to another data administrator,
- you have the right to object to the processing of your personal data,
- to the extent that the basis for the processing of your personal data is your consent, you have the right to withdraw your consent at any time. Withdrawal of the consent does not affect the lawfulness of the processing that was made on the basis of consent before its withdrawal,
- you also have the right to lodge a complaint with the supervisory body dealing with the protection of personal data,
- ask the Data Protection Officer for advice or a complaint. Before you ask the supervisory body to process your personal information, we encourage you to contact our Data Protection Officer (see item 8) to resolve the problem as soon as possible,
- You have the right to deactivate your customer profile on our website, if presently you do not have any obligations to us or entities cooperating with us,

In a situation where your Client Profile or your personal information is deleted at your request, as a result of which we will not be able to identify you and you want to enter into a new loan agreement in the future, we will probably not be able to offer you a promotional loan.

8. Who can you turn to for help?

If you have any questions about the Privacy Policy or the processing of your personal data, or if you would like to exercise your rights, contact the Data Protection Officer at the email address: iod@creamfinance.pl.

His tasks include monitoring and taking care of the processing of your personal data in accordance with EU and national regulations on the protection of personal data. Therefore, before you contact the supervisory body with a complaint, we encourage you to contact our Data Protection Supervisor to resolve the problem as quickly as possible.

9. Certain Privacy Shield Matters

As noted above, CreamWise Inc. and Solfin.net Inc. each complies with the EU-U.S. Privacy Shield Framework ("Framework") as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. In connection therewith the following items are noted:

- Affiliated companies to CreamWise Inc. and Solfin.net Inc. disclose personal information to certain third parties. The third parties to whom such affiliates disclose and the purposes therefor are described in Section 5 above. CreamWise Inc. and Solfin.net Inc. do not disclose personal information to any third parties, other than its own company affiliates in order to advance the purposes as described in Section 5 above.
- CreamWise Inc. and Solfin.net Inc. are subject to the investigatory and enforcement powers of the Federal Trade Commission, including related to a failure to comply with the Framework.
- Under certain conditions, you may invoke binding arbitration related to failures in the collection, use and retention of your personal information.
- CreamWise Inc. and Solfin.net Inc. will have liability in case of prohibited onward transfers to third parties, including under Section 5 of the FTC Act.