

Privacy policy

I. Aim of the Data Protection Policy

1.1. As part of its social responsibility, the Solunex (registration number 400440055) is committed to international compliance with data protection laws. This Data Protection Policy (hereinafter - Policy) fully applies to the Solunex and is based on globally accepted, basic principles on data protection. Ensuring data protection is the foundation of trustworthy business relationships and the reputation of the Solunex as an attractive employer.

1.2. The Data Protection Policy provides one of the necessary framework conditions for domestic and cross-border data transmission among the Solunex, its subsidiaries, affiliates, and other partners. It ensures the adequate level of data protection prescribed by the European Union Data Protection Directive and the laws of respective Jurisdiction for domestic and cross-border data transmission, including in countries that do not yet have adequate data protection laws.

II. Scope and Amendment of the Data Protection Policy

2.1. This Data Protection Policy fully applies to the Solunex and is applied for the purposes of personal data processing.

2.2. The Policy applies to the Solunex's customers, natural persons and legal entities, non-juridical entities, state or self-government entities, legal entities of public law, job applicants, merchants, payment system providers, and other entities having no specific framework agreement with the Solunex on regulating issues related to personal data processing.

2.3. Anonymized and non-identifiable data, e.g., for statistical evaluations or studies, is not considered to be personal data and is not subject to this Data Protection Policy.

2.4. This Policy may be updated from time to time. We, therefore, ask you to consult it on a regular basis on the website.

III. Application of National Laws

3.1. This Data Protection Policy comprises the internationally accepted data privacy principles without replacing the existing national laws. It supplements the national data privacy laws. The relevant national law will take precedence in the event that it conflicts with this Data Protection Policy.

IV. Principles for Processing Personal Data

4.1. Fairness and Lawfulness: When processing personal data, the individual rights of the data subjects must be protected. Personal data must be collected and processed in a legal and fair manner.

4.2. Restriction to a Specific Purpose: Personal data can be processed only for the purpose that was defined before the data was collected. Subsequent changes to the purpose are only possible to a limited extent and require substantiation.

4.3. Transparency: The data subject must be informed of how his/her data is being handled. In general, personal data must be collected directly from the individual concerned. When the data is collected, the data subject must either be aware of or informed.

4.4. Deletion: The Solunex shall continue to process personal data pursuant to the purpose set forth by the Policy as long as it is deemed appropriate for the purposes of the Solunex's aims and interests, is required by a regulatory body, and/or applicable laws and regulations.

4.5. Factual Accuracy; Up-to-dateness of Data: Personal data on file must be correct, complete, and if necessary - kept up to date. Suitable steps must be taken to ensure that inaccurate or incomplete data are deleted, corrected, supplemented, or updated.

4.6. Confidentiality and Data Security: Personal data is subject to data secrecy. It must be treated as confidential on a personal level and secured with suitable organizational and technical measures to prevent unauthorized access, illegal processing or distribution, as well as accidental loss, modification, or destruction.

V. Scope of Data Processing

5.1. Throughout the period of using the Solunex's services and after the termination of a contractual relationship, the Solunex shall be entitled to process the information, including personal data, of a data subject in compliance with the purposes set forth in Paragraph VII of the Policy.

5.2. Data processing by the Solunex, without any limitation, includes every action executed towards the data using automated, semi-automated, or non-automated means. More precisely, data processing means obtaining, collecting, recording, photographing, audio recording, video recording, organizing, storing, altering, restoring, revoking, or disclosing from the data subject or third parties for the purpose of transferring, disseminating or making available through different means, grouping or combining, blocking, erasing or destroying.

5.3. The Solunex and/or third parties process the data of a data subject or indicated by him/her. Data processing includes but is not limited to the following personal data:

- (a) Name and surname of data subject, password;
- (b) Personal identity number and/or unique features of electronic identity card;
- (c) Address of registration and/or factual residency;
- (d) Telephone/mobile phone number;
- (e) E-mail address;
- (f) Data disclosed while using various electronic channels and/or the internet (including but not limited to web-cookies and so forth) and activities of data subject and/or third parties indicated by data subject while using the aforementioned channels (including but not limited to authentication into such channels and actions executed or transaction history; IP address; payment information; Website interaction information: Data on visited pages, actions on the site, access time, browsers and devices used).

VI. Basis of Data Processing

6.1. The data subject hereby agrees and acknowledges that throughout the period of using the Solunex's services and after the termination of a contractual relationship, it is necessary for the Solunex to process data (including personal data) related to the data subject or third parties indicated by the data subject for the purposes of:

- (a) Reviewing the application of and/or performing a service to the data subject;
- (b) Protecting the legal interests of the Solunex and/or third parties;
- (c) Performing obligations of the Solunex under the legislation;
- (d) Making a marketing offer to the data subject;
- (e) Other cases permitted by the legislation.

6.2. In case the legislation requires the Solunex to obtain consent of the data subject before processing the data (e.g., for marketing purposes), such consent shall be deemed obtained on the basis of a statement made by the data subject by using electronic and/or non-electronic means where he/she agrees to the Policy and the terms herein.

VII. Purposes of Data Processing

7.1. The Solunex may process personal data of the data subject or third parties indicated by the data subject for various purposes including but not limited to:

- (a) Performing Solunex services duly and properly;
- (b) Cases determined by the legislation, for making the information available to audit companies, prospective assignee or assignor, regulatory, controlling, or other supervisory authorities;
- (c) Optimizing and developing the Solunex's services during which the Solunex analyses the data of a data subject related to statistical data and so forth;
- (d) Preparing and presenting various reports, researches, and/or presentations;
- (e) Providing the safety as well as detecting and/or preventing fraud, money laundering or other criminal activities;
- (f) Offering various services/products of the Solunex and or third parties set forth in Annex #1 of the Policy for marketing purposes;
- (g) to process transactions, verify identity (KYC/AML), provide account access and customer support;
- (h) to send transaction notifications, updates, promotional offers (with your consent);
- (i) to comply with applicable laws, including anti-money laundering (AML) and counter-terrorist financing (CFT) requirements.

VIII. Processing Data of Applicants or Employees

8.1. Processing personal data for the purposes of initiating, carrying out and terminating employment agreement. The Solunex is entitled to processing subject's personal data which was disclosed for the purpose of considering an initiation of employment and/or internship of such a person (hereinafter Applicant). If the applicant is rejected, failed to proceed through

selection process, unsuccessfully ended the trial period, his/her data must be deleted, unless the applicant has agreed (by electronic as well as non-electronic means) to remain on file for a future selection process by the Solunex and/or third parties.

8.2. If it should be necessary during the application procedure to collect information on an applicant from a third party, the requirements of data protection laws have to be observed.

8.3. There must be legal authorization to process personal data that is related to the employment relationship but was not originally part of performance of the employment agreement. This can include: a) legal requirements, b) consent of the applicant (by electronic as well as non-electronic means) or c) the legitimate interest of the Solunex or third party and d) purposes set forth in Paragraph VII of the Policy.

IX. Processing of Highly Sensitive Data

9.1. Highly sensitive personal data can be processed only under applicant's (data subject) written consent or without such consent when processing is expressly permitted or prescribed under national law (including but not limited to considering an initiation of employment). Highly sensitive data is data about racial and ethnic origin, political beliefs, religious or philosophical beliefs, union membership, health and sexual life, criminal record, administrative detention, preventive measures, plea bargain, diversion, recognition as a victim or an affected by the crime, as well as biometric and genetic data, which enable the identification of a physical person.

9.2. Applicants consent on processing highly sensitive personal data must be clearly expressed in written.

X. Transferring/Disclosing Information to and from the Third Parties

10.1. In order for Solunex to perform its services to the data subject duly and properly, within the scope of data processing, it is necessary for the data related to the data subject and/or third party indicated by the data subject to be disclosed to and/or transferred to third parties.

10.2. For the purpose of receiving Solunex services and to a necessary extent compatible with such a purpose, the data subject grants the Solunex an irrevocable right, pursuant to which, without the data subject's prior or further consent:

- (a) The Solunex, pursuant to the manner determined by the legislation, shall have the right to repeatedly obtain personal data related to the data subject.
- (e) Pursuant to the manner determined by the legislation, repeatedly transfer/disclose to and from third parties (including but not limited to affiliates, controlling/supervisory authorities, audit companies, prospective assignee or assignor and so forth) necessary to the Solunex data (including but not limited to personal data, transaction history and so forth) related to the data subject and/or third party indicated by the data subject.

XII. Video Surveillance and Audio Recording

12.1. For the purposes of safety and protection of property and confidentiality, also for the purposes of service quality control, in accordance with the requirements of Laws on Personal Data Protection, the outer perimeter and entrances of the buildings, workplace are under video surveillance and audio recording. Video surveillance is also being carried out using ATMs and other electronic devices and audio-recording is being carried out while communicating with the Solunex using the telephone.

12.2. The data subject shall be informed using appropriate means at points of service of the Tonwex and while communicating with the Solunex about ongoing video surveillance and video-recording. The data subject acknowledges the importance of video surveillance and audio-recording and hereby consents the Solunex to process his/her data in that regard.

XIII. Copyright

13.1. The data subject hereby agrees that data related to the data subject (print, audio and/or visual) published on the Solunex's website, Solunex Bot and other electronic means, shall be deemed as the Solunex's property and the Solunex shall own a copyright over such data immediately after its publishing unless it is not classified as personal data of the data subject.

XIV. Processing and Retention Period

14.1. In case of the data subject's request, the Solunex, with scope consistent with the legislation, shall provide the Client with information about personal data related to the Client kept by the Solunex. The Solunex is entitled to impose a service fee for providing the Client with such information, except when providing the information free of charge is prescribed by the law.

14.2. Should the data subject deem data related to him/her kept in the Solunex as incomplete or not exact, the data subject shall be obliged to immediately notify the Solunex with written notice.

14.3. Unless otherwise determined by the legislation, the data subject is not entitled to require the Solunex to erase the personal data related to him/her kept by the Solunex.

XV. Rights of the Data Subject

15.1. Every data subject has the following rights. Their assertion is to be handled immediately by the responsible unit and cannot pose any disadvantage to the data subject:

- (a) The data subject may request information on which personal data relating to him/her has been stored, how the data was collected, and for what purpose. If there are further rights to view the employer's documents (e.g. personnel file) for the employment relationship under the relevant employment laws, these will remain

unaffected.

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- (b) If personal data is transmitted to third parties, information must be given within a reasonable time, about the identity of the recipient or the categories of recipients in case the data subject submits such request;
- (c) If personal data is incorrect or incomplete, the data subject can demand that it be corrected or supplemented.
- (d) The data subject can object to the processing of his or her data for purposes of advertising or market/opinion research. The data must be blocked from these types of use in case the data subject submits a refusal on processing his/her personal data for the purposes of advertising or marketing.
- (e) The data subject may request his/her data to be deleted if the processing of such data has no legal basis, or if the legal basis has ceased to apply. The same applies if the purpose behind the data processing has lapsed or ceased to be applicable for other reasons. Existing retention periods and conflicting interests meriting protection must be observed.
- (f) The data subject generally has a right to object to his/her data being processed, and this must be taken into account if the protection of his/her interests takes precedence over the interest of the data controller owing to a particular personal situation. This does not apply if a legal provision requires the data to be processed.
- (g) Additionally, every data subject can assert the rights under the Policy as a third-party beneficiary if a company that has agreed to comply with this Data Protection Policy does not observe the requirements and violates the party's rights.

XVI. Confidentiality of Processing

16.1. Personal data is subject to data secrecy. Any unauthorized collection, processing, or use of such data by employees of the Solunex, its subsidiaries and/or affiliates is prohibited. Any data processing undertaken by an employee of the Solunex, its subsidiaries and/or affiliates that he/she has not been authorized to carry out as part of his/her legitimate duties is unauthorized. Employees of the Solunex, its subsidiaries and/or affiliates may have access to personal information only as is appropriate for the type and scope of the task in question. This requires a careful breakdown and separation, as well as implementation, of roles and responsibilities.

16.2. Employees of the Solunex, its subsidiaries and/or affiliates are forbidden to use personal data for private or commercial purposes, to disclose it to unauthorized persons, or to make it available in any other way. Supervisors must inform their employees at the start of the employment relationship about the obligation to protect data secrecy. This obligation shall remain in force even after employment has ended.

XVII. Processing Security

17.1. Personal data must be safeguarded from unauthorized access and unlawful processing or disclosure, as well as accidental loss, modification or destruction. This applies regardless of whether data is processed electronically or in paper form. Before the introduction of new methods of data processing, particularly new IT systems, technical and

organizational measures to protect personal data must be defined and implemented. These measures must be based on the state of the art, the risks of processing, and the need to protect the data.

XVIII. Data Protection Control

18.1. Compliance with this Data Protection Policy and the applicable data protection laws is checked regularly by authorized employees of corresponding structural units of the Solunex. The responsible data protection authority can perform its own controls of compliance of the Solunex, its subsidiaries and affiliates with the regulations of this Policy, as permitted under national law.