

Privacy Policy

1. Definitions

Website(s) - Websites means www.transporea.com and other connected websites which belong to I2M Group s. r. o., with its registration number 53 832 019 and registered address Lermontovova 911/3, 81105 Bratislava - Stare Mesto, Slovakia.

Personal Data or Information - Personal Data or Personal Information means any information relating to an identified or identifiable natural person.

Usage Data - Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Cookies - Cookies are small pieces of data stored on the device (computer or mobile device) of a user tied to information about the user.

Data Controller - Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Privacy Policy we are a Data Controller of your Personal Data.

Data Processors (or Service Providers) - Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

Data Subject (or User) - Data Subject is any living individual who is using our Service and is the subject of Personal Data.

GDPR - General Data Protection Regulation (Regulation EU 2016/679).

2. Introduction

I2M Group s. r. o. (hereinafter referred to as "I2M", "We", "Us", "Our", "Transporea") is committed to protect and respect individuals' personal data in line with the requirements of applicable law.

This Privacy Policy (hereinafter referred to as "Policy") sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Transporea when you use our website and/or our client portal or our platform or any of our services, or where we enter into any other business or employment relationship with you. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

Transporea` commitment applies to all individuals whose personal data it may process.

3. Data/Information that we may collect and process

We collect and process different types of personal data for a variety of purposes. These may include following:

- a) Personal information you give us by phone, email, and via our websites, in writing or otherwise. This includes but is not limited to information you give us when you request quotations, register for email alerts, signup for newsletters or Information that you provide

by filling in forms on the Websites. The information you give us can include your name, address, email address and other contact information. It can also include your financial and debit card information, bank account number and other personal details such as your National Insurance number, identification details (e.g., Passport number, National ID number), National tax ID or details about your education and career.

- b) Personal data for contract, service provision we have entered with you or data collected in order to take certain steps prior to entering into a contract with you. We will use your personal data to provide you with our services or for purpose of employment in our company. These may include but is not limited to name, position, residential address, identification details (e.g., passport) postal address, business address, mobile number, email address, proof of source of income etc. This might also include information provided at the time of registering to use or/and logon to our platforms and client's zone, by which Transporea may offer its services, subscribing to our services (including but not limited to news alerts), or requesting further information and/or services.
- c) Publicly available information. Transporea may also process personal data from public sources including from databases for compliance checks or sources such as e.g., LinkedIn.
- d) Appointment to office. Transporea may process personal data in relation to individuals that may be appointed to an official position such as directors, shareholders or the secretary to a company or officers or persons involved in any other legal entity.
- e) Compliance with a legal obligation Transporea might be required to comply with certain legal and regulatory obligations, which may involve the processing of personal data. (e.g., employment records, company records, tax reporting obligations). Transporea may also need to provide information to a public body or law enforcement agency when we are so required.
- f) Personal information necessary for the management of associations, conferences and events. Transporea may organise different kind of events or conferences either for promoting and marketing its services to existing and potential clients, for networking purposes or for finding potential candidates for employment.

Further to all the above, the most common types of information that We collect include names, email addresses, IP addresses, other contact details, profession, qualifications, survey responses, dietary requirements, photos, credit card information, tax information, copies of Passport or ID, quotes, etc. The information may be used to process your registration, take payment, manage your flights and/or accommodation, manage flight bookings, organize meals with the appropriate supplies of food communicate with you about other ancillary events, gain feedback. This information may be used for future contact, only with your consent, in order to market the Transporea` services to you or in order to inform you for similar events or in regard to possible employment opportunities that are tailored to you if appropriate. This information will be held by Us until you choose to unsubscribe/withdraw your consent, in accordance with article 7(3) of the General Data Protection Regulation (Regulation EU 2016/679).

- g) Photographs/pictures, presentations, audio and video recording of speakers and participants and live web streaming of the events or conferences may be taken. We typically use these recordings for promotional photos and videos displayed on the event websites. Furthermore, they may be reproduced in various media including Transporea` publications, website, social networks, TV channels and the press, in connection with the event or conference as well as for promotional activities. If you for any reason do not wish to be included in any footage, please inform us at the time of booking via dataprotection@transporea.com providing a photo of yourself so we can look to exclude it from recordings where possible.

- h) Personal Information from third party service providers. We may receive information about you from third party service providers such as credit reference agencies, payment service providers, or analytics providers.
- i) Usage data and tracking cookies data, which includes details of your visits to the Websites including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access. We use cookies and similar tracking technologies to track the activity on our Websites and hold certain information. We may also collect information how the Service is accessed and used. This Usage Data may include information such as your computer's Internet Protocol address (e.g., IP address), browser type, browser version, the page of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

4. Time and Collection of personal data

Directly:

Personal data may be obtained where you or an organisation with which you are related in any capacity (e.g., employee, officer, representative) contact Transporea (e.g., by e-mail, phone, contact form) in relation to any services that it may provide.

Transporea may also obtain personal data directly when is establishing a business relationship, performing professional services through a contract, or through our hosted software applications.

Your personal data may also come to our possession in case you express any interest to and/or become an employee of Transporea.

Your data may also be processed if you sign up to receive any informative or marketing material via our newsletter.

Your personal data may also be processed if you register for seminars or conference, attend meetings or events we host, or visit our offices.

Your data may also be collected when an organisation engages Transporea to provide services and you are engaged in the organisation in any capacity that is relevant (for example, director, representative, employee of such entity with which Transporea deals in providing any services).

Indirectly:

Transporea may obtain personal data indirectly about individuals from a variety of sources, including recruitment services and our clients. We may attach personal data to our customer relationship management records to better understand and serve our business clients, subscribers and individuals, satisfy a legal obligation, or pursue our legitimate interests.

Transporea may obtain personal data about candidates for job position from other parties including former employers.

Our business clients may ask Us to perform services which involves sharing of personal data they control as part of that engagement. For example, we will review payroll data as part of an audit. Our services may also include processing personal data under our clients' control, which may be governed by different privacy terms and policies.

Public sources:

Transporea may also collect personal data from other sources including public registers (such as Registrar of Companies), news articles, sanction lists, Internet searches and risk intelligence service providers.

If you choose not to give your personal information:

Where Transporea needs to collect your personal data by law, or under the General Terms and Conditions of Transporea and you fail to provide that data when requested, Transporea may not be able to perform the contract we have or are trying to enter with you (for example to provide you with services or to employ you).

5. Use of personal data

Transporea uses the collected data for various purposes, such as:

- a) To provide you with any services and/or information you request from Us. This also includes carrying out any obligations specified in any contracts between Us;
- b) Providing professional advice and delivering reports related to our tax, advisory, audit and assurance and other professional services. o To process online requests, including responding to communications from individuals or requests for proposals and quotations.
- c) Notify you about changes to Our services.
- d) Provide customer support.
- e) To comply with Our legal and regulatory obligations including accounting and tax, co-operate with the court service, our regulators and law enforcement agencies and to prevent and detect crime.
- f) Manage the day-to-day tasks relating to the business relationship with you (e.g. communication, payments, invoicing).
- g) Analyse, market and improve its services as well as develop new services that may be of interest to you.
- h) For internal corporate reporting, business administration, ensuring adequate insurance coverage for Our business, ensuring the security of company facilities, research and development, and to identify and implement business.
- i) For physical security and IT security purposes.
- j) For insurance coverage purposes.
- k) Helping support clients to run a series of development programs for education and learning purpose.
- l) To be able to identify the individuals acting for a Client Entity or engaged by a Client Entity in a task which requires that Transporea communicates with such individuals.
- m) To defend or uphold Our legal rights.
- n) To comply with any order of a responsible court or other authority.
- o) In relation to any services that may be offered to Transporea by any person or other entity including for example legal services, tax services, public services.
- p) For research purposes regarding the effectiveness of website services, marketing, advertising and sales efforts.
- q) To keep you informed in relation to its services and products.
- r) Sending invitations and providing access to guests attending our events.
- s) For direct marketing purposes in promoting Transporea` legitimate interest. In such a case you may opt-out of direct marketing as provided further below.
- t) For organising an event or conference and providing relevant information to participants.

- u) To monitor the Usage of Our websites and platforms.
- v) To gather analysis or valuable information so that we can improve Our services.
- w) To detect, prevent and address technical issues.
- x) Where it is needed to perform the employment contract that Transporea has entered in with you.
- y) For recruitment, employment, payroll and other related purposes.
- z) For purposes that are similar or connected to the above or for any other purpose that you or will provide personal data to Us.

6. Legal basis for processing of personal data

Transporea may process the personal data set out above on one or more of the following:

- a) processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract with Transporea;
- b) processing is necessary for the purposes of the legitimate interests pursued by Transporea, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where the data subject is a child.
- c) Our legitimate interests are to:
 - run, grow and develop our business;
 - delivering services to our clients;
 - ensure a safe environment for our staff and website visitors; o marketing, market research and business development;
 - provide client services; and,
 - for internal group administrative purposes.
- d) you have provided your consent to Transporea for the specific purpose of processing;
- e) Transporea has a legal obligation to collect your personal information;
- f) processing is necessary in order to protect the vital interests of you or of another natural person.

7. Record keeping of personal data

Transporea will retain your Personal Data only for as long as is necessary for the purposes set out in this Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Retention periods are determined by legislation and business requirements. In most cases we will hold your data for three (3) years after last contact, unless a legal or regulatory obligation requires that we hold this data for a superseding period of time. We can use it to respond to any questions or complaints, to maintain records according to rules that apply to us, or for fighting financial crime, including fraud.

Where Transporea stores personal data based on your consent, it will delete such personal data when you withdraw your consent and provided that it is not obliged under law to maintain such data.

In case of recruitment activities, Transporea will delete your personal data if you are not employed unless you expressly consent for to the storing of your personal data for potential future roles and/or other purposes. If you accept an offer of employment by Transporea, any relevant personal data

collected during your pre-employment period will become part of your personnel records and will be retained. For Transporea` employees we will retain personal data for a minimum of six (6) years.

Where we process information on behalf of other organisations, we apply the same retention periods as above.

Transporea will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

8. Provision of personal data to third parties

Under certain circumstances, Transporea may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency, regulatory authorities).

Transporea may share information in the context of providing its services to you with other third parties including for example other specialist service providers, its own legal and/or other advisors, entities offering services in relation to AML and fraud prevention checks, payment services providers, marketing services provider, financial institutions whose services may be required as part of the services that you require Transporea to provide to you, other service providers (e.g., providers of telecommunication systems, development tools, online storage centres, cloud service providers, statistics monitoring analyses).

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Transporea also may share personal information with law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation.

Transporea may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Transporea
- To prevent or investigate possible wrongdoing in connection with the Services
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

9. Transfers of personal data to third countries

Transporea stores personal data on servers located in the European Economic Area (EEA). Transporea may transfer personal data to third countries outside the EU/EEA where required. In this case, Transporea will ensure that such transfers will comply with the General Data Protection Regulation (Regulation EU 2016/679 based on a Commission Adequacy decision, or appropriate safeguards (e.g., standard contractual clauses) or other grounds provided by the GDPR. You may contact Transporea in order to be informed of the appropriate or suitable safeguards.

10. The safety of personal data

Transporea takes the security of your personal data very seriously, and we use appropriate technologies and procedures (physical, organisational and technical) to protect your personal information to ensure the safety of your personal data. No method of transmission over the Internet,

or method of electronic storage is 100% secure. The internet is an open medium and we cannot guarantee that any information you send to us by email or via our sites won't be intercepted or tampered with. Any transmission is at your own risk.

While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

11. Personal data that is provided to Us in relation to other individuals

Where you or a Client Entity provides to Transporea personal data of other individuals (e.g., officers, secretary, employees, other individuals that the Client Entity interacts with, or persons related to you) you or the Client Entity (as the case may be) represent to Transporea that you or the Client Entity are duly entitled to do this.

You or a Client Entity also represent and that the individual in question is aware of the relevant Transporea` data protection practices as stated in this Policy which may be relevant to the individual, how Transporea may be contacted as well as such information that you or a Client Entity are obliged to provide to such individual under applicable laws in relation Transporea.

12. Your data protection rights

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Transporea aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

In certain circumstances, you have the following data protection rights:

- a) Right of access - you have the right to request from Transporea to provide you with a copy of the personal data that we hold about you.
- b) Right of deletion (right to be forgotten) - you have a right to request from Transporea to erase your personal data from its records. In case that these circumstances apply to your case and provided that no exception to this obligation applies (e.g. where we are obliged to store your personal data in compliance with a legal obligation under EU law), your personal data will be deleted from records of Transporea
- c) Right to restriction of processing - you have a right to request from Transporea acting as your controller where certain conditions apply, to restrict the processing of your personal data. Where these conditions apply Transporea will restrict the processing of your personal data.
- d) Right of rectification - you have the right to have your information rectified if information held about you is inaccurate or incomplete.
- e) Right to withdraw consent - you have the right to withdraw your consent at any time where Transporea relied on your consent to process your personal information.
- f) Right to data portability - you have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format and to request from Transporea to have the data held about you transferred to another organisation.
- g) Right to object - you have the right to object on grounds relating to your particular situation to certain types of processing such as direct marketing. o Right to object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.

- h) Right to complain - You have a right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. For more information, please contact your local data protection authority in the European Economic Area (EEA).

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems or to execute other rights as per GDPR, please contact us by e-mail at dataprotection@transporea.com.

We may request you to provide us with information necessary to confirm your identity before responding to any request you make as well as you might be requested to complete Data Subject Access Request Form in some cases.

Transporea will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request, unless we tell you we are entitled to a longer period required by applicable law). In this case, we will notify you within one (1) month of the receipt of your request about the extension and keep you updated.

Transporea may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case we will send you a fee request which you will have to accept prior to us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.

13. Information about the use of Cookies and IP addresses

Transporea uses cookies in order to deliver a better user experience on its website.

We may collect information about your mobile phone, computer or other device from which you access the Website including where available [your IP address, operating system and browser type], for systems administration [and to report aggregate information to third party affiliates]. This is statistical data about our users' browsing actions and patterns and does not identify any individual. We may, however, use such information in conjunction with the data We have about you in order to track your usage of our services.

Our Website uses cookies to distinguish you from other users of our Website. This helps Us to provide you with a good experience when you browse our Website and also allows Us to improve the Website. By using our Website, you agree to our use of cookies as more specifically set out below.

A cookie is a small file of letters and numbers that We store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. The information used by browsers can help to improve the functioning of the Website enabling it to recognize the User's preferences each time the user returns.

Other technologies, including the data We store on your browser or device, the information associated with your device, and other software, are used for similar purposes.

The Company's website does not request personal information from its visitors while navigating its content. The Company's website may collect personal information of its visitors and/or Users. Personal information is the data that can be used to identify or communicate with an individual, as well as other information relating to that person. Therefore, the information we collect from you or about you differs depending on the service you choose to use through our Website.

The cookies We use include:

“Analytical” cookies. They allow Us to recognise and count the number of visitors and to see how visitors move around the Website when they are using it. This helps to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.

“Strictly necessary” cookies. These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website or make use of e-billing services.

“Functionality/Permanent” cookies. These are used to recognise you when you return to our Website. This enables Us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

“Targeting” cookies. These cookies record your visit to our Website, the pages you have visited and the links you have followed to our affiliate’s websites. We will use this information to make our Website, offers e-mailed to you and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Website and our platform. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our Websites.

For how long a cookie will remain on your computer or on a mobile device depends on whether it is a Permanent cookie or Session cookie. Session cookies will remain on your device only until you stop browsing. Permanent cookies remain on your computer or mobile device until they expire or are deleted.

The information that we collect is used to improve the quality of our services, to prevent the abuse or misuse of our services, comply with legal obligations and to make our marketing more efficient. The company collects your IP Address upon accessing client’s area and/or trading platform and is in conjunction with the acceptance of the client account opening documentation, in order to improve identification and security.

The Company uses Cookies for the following purposes:

“Situation” - We use session cookies to see if you are logged in to our website.

“Personalization” - We use cookies to store information about your preferences and tailor our Website for you.

“Advertising” - We use cookies to help us run ads of interest to you.

“Analysis” - We use cookies to help Us analyse the use and performance of our Website and Services.

The data is stored for as long as necessary to provide services to you and other users, including those described above. The information related to you will remain stored until you leave our website.

For further information regarding cookies please follow this link: <https://www.allaboutcookies.org/>.

14. Analytics

We may use third-party Service Providers to monitor and analyse the use of our Service.

Google Analytics:

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <http://www.google.com/intl/en/policies/privacy/>

15. Links to other sites

Our Website also may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide while visiting such sites and such sites are not governed by this privacy statement. You are advised to review the Privacy Policy of every site you visit.

16. Contact

If you cannot find what you are looking for here or have a concern about our use of your personal data, please contact us via email on dataprotection@transporea.com or write to Us at I2M Group s. r. o., with its registration number 53 832 019 and registered address Lermontovova 911/3, 81105 Bratislava - Stare Mesto, Slovakia.

17. Changes to this policy

We may update our Policy from time to time to reflect a change in the data protection practices or legal framework. In the case that this Policy will be amended the revised document will be posted on the website and such change will apply from the date that it is posted unless otherwise stated in the revised Privacy Policy. You are advised to review this Policy periodically for any changes.