

The title of the document	Privacy Policy of Symmetrical
The purpose of the document	Fulfilling the disclosure requirement resulting from regulations on the protection of personal data of parties to agreements (and their representatives) concluded with Symmetrical group entities
Effective date	1.04.2020

Background Information

This policy constitutes a comprehensive collection of all information on the processing of personal data of parties to agreements (and their representatives), e.g., mandate contracts, employment contracts, goods and services supply contracts, except for salary financing agreements (in this scope, the principles of data processing are regulated by the privacy policy dedicated to Symmetrical's clients), by Symmetrical. It concerns all websites, mobile applications, services and agreements concluded by Symmetrical.

The policy is always available at [Symmetrical.ai/gdpr](https://symmetrical.ai/gdpr) and via Symmetrical's mobile application. It is also sent to your email address in the course of concluding any agreement with Symmetrical (if the agreement is concluded in writing, a hard copy of the policy may be additionally provided).

We used our best efforts to write the Policy in a clear, simple and transparent manner. We limited the number of references within the document and references to legal regulations. Nevertheless, a read-through the entire policy will reveal unavoidable repetitions.

What enterprises belong to the Symmetrical group?

SYMMETRICAL.AI Limited., with its registered office in Suite 1, 3rd Floor 11 - 12 St. James's Square, London, United Kingdom, SW1Y 4LB, entered in the Companies House Register under number 11843660.

Clarification

Symmetrical.ai is a British company that owns Symmetrical Labs and Symmetrical Financials; it predominantly serves a holding function (supports the management of the Symmetrical group).

SYMMETRICAL LABS SP. Z o.o., with its registered office in Warsaw on ul. Rozbrat 6/17, 00-451 Warsaw, entered in the register of entrepreneurs of the National Court Register maintained by the District Court for the Capital City of Warsaw in Warsaw, 12th Commercial Division of the National Court Register, under KRS no. 0000747407, NIP (tax ID) 7010850471, share capital: PLN 300,000 paid in full.

Clarification

Symmetrical Labs is a Polish technology company which delivers IT solutions required for the proper functioning of salary financing services.

SYMMETRICAL FINANCIALS SP. Z O.O., with its registered office in Warsaw on ul. Rozbrat 6/17, 00-451 Warsaw, entered in the register of entrepreneurs of the National Court Register maintained by the District Court for the Capital City of Warsaw in Warsaw, 12th Commercial Division of the National Court

Register, under KRS no. 0000775925, NIP (tax ID) 7010911511, share capital: PLN 200,000 paid in full.

Clarification

Symmetrical Financials is a Polish financial company which is a credit intermediary registered with the Polish Financial Supervision Authority and a lending institution that provides financial products as a part of salary financing services.

What personal data does Symmetrical collect?

1. Personal data

Personal data are your basic data, such as your given name and surname. Many contracts require the collection of PESEL and NIP (tax ID) numbers.

2. Contact details

Contact details are information that allows us to contact you directly. These are, above all, your phone number and email address. Sometimes, these data may include your mailing or residential address (e.g., in the case of employment contracts), or your business address.

3. Data concerning the history of your cooperation with Symmetrical

We store information about the agreements that bind us, the related settlement of accounts, and incurred expenses.

4. Economic and payment data

Usually, this is the number of the payment account you use for the purposes of settling accounts with Symmetrical.

5. Employment data

This is information about your employment and cooperation with ordering parties (regardless of its legal basis), in particular the information provided in the course of concluding the agreement.

6. Correspondence history and conversation recordings

We strive to archive our correspondence and thus we will store all emails and letters exchanged with you. We may also record our phone conversations (which you will always be informed of before we start recording). In such a case, we will store the recording as well.

7. Other data required under legal regulations

Legal regulations impose numerous obligations on us with regard to certain situations, e.g., in the case of employment contracts, we must collect data provided for in the Labor Code. Therefore, in the case of many agreements, we will collect data not only for our own purposes, but also in relation to legal requirements and requirements imposed on us by authorities that supervise our activity.

What is the purpose for which Symmetrical processes personal data?

1. Correspondence exchange, newsletter

We collect your data that is necessary for sending our correspondence, usually in response to your interest in our services or inquiries concerning our services via our website, application (in particular via the contact form in the application), electronic mail and personally.

2. Performance of agreements

In order to conclude and perform other agreements than those concluded with our clients, such as employment contracts, service or goods delivery contracts, lease agreements, we process the data of parties to such agreements and their representatives.

3. Assertion of claims and defense against claims

As the data controller, we have the right to process your data for the purposes of asserting our claims or defending against your claims. It is our legitimate purpose and it does not require your consent.

4. Fulfillment of obligations under legal regulations

We also collect personal data to fulfill our obligations resulting from legal regulations, which are primarily related to the Accounting Act (the requirement to store accounting records and agreements) and the Labor Code.

From where does Symmetrical obtain personal data?

1. Information obtained directly from you

You provide us with your data directly, e.g., by filling in forms, agreement documents, or exchanging correspondence with us. We may also ask you to confirm your data that we obtained from another source. The data you provide us with are necessary for the achievement of the purposes for which they are collected. Their provision is voluntary, but if you do not provide such data, we will be unable to achieve the intended purpose or its achievement will be hindered.

2. Employer / ordering party

We receive data from your employer or ordering party, e.g., when your employer is our contracting party and provides us with goods or services.

3. Symmetrical Group

Our companies exchange your data for administrative purposes (we handle our correspondence, manage our finances, financial reporting, personal data protection and compliance risk jointly) and to provide services, in particular the salary financing services for which Symmetrical Labs is the provider of technology and data, while Symmetrical Financials is the provider of capital and financial services (as a credit intermediary or lender).

Who will have access to my personal data?

1. Symmetrical Group entities

Data is exchanged within the Symmetrical group in relation to the joint use of many services, sharing the IT infrastructure, offices, etc. In the course of our operations, which in particular concern the handling of correspondence, financial reporting, or joint management of personal data security and compliance risk, data that is necessary for the performance of such operations might be exchanged between

particular companies within the group.

2. Subcontractors (especially technical subcontractors)

On the basis of data processing agreements, we transfer the data to our providers of various services, the most important of which are Amazon Web Services (this service enables the functioning of our system used for the provision of salary financing services) and Google GSuite (we use this service to send emails with notifications or documents that are required in the course of service provision). Our subcontractors process data within Europe and observe the highest security standards with regard to the data entrusted to them.

3. Public offices and state institutions

Legal regulations oblige us to transfer data to various state institutions. Such a transfer may be conducted without your consent or knowledge. This remains beyond our control, but we will always use our best efforts to verify the correctness of such transfers and to only transfer the required data in a secure manner that ensures the confidentiality of your data.

Rights of the data subject

1. You have the right to access your data, that is you can inquire about which of your data we process. Moreover, you can inquire about the source of such data, our subcontractors that have access to such data and other controllers that had access thereto. You can ask for a copy of your data (including an electronic copy), which will be sent to you or to a controller indicated by you.
2. You have the right to withdraw your consent for data processing (if you have granted such consent), but it will not affect the correctness of data processing before such withdrawal. You may not withdraw your consent for data processing if the data is processed on a basis other than your consent (e.g., under legal requirements).
3. You are also entitled to object to the processing of your data for marketing purposes if in your case such processing is based on our legitimate interest, i.e., without asking for your consent.
4. You have the right to update your data or report that they need to be corrected.
5. You have the right to request that your data be removed, but only if we are not obligated to the further processing thereof (in connection to an agreement or legal regulations).
6. You have the right to request that the processing of your data be restricted if there is any doubt as to the correctness of such processing (e.g., when you submit a complaint questioning the conclusion of the agreement).
7. You have the right to lodge a complaint with the Personal Data Protection Office (www.uodo.gov.pl).

Data storage period

1. Business partners/associates and their representatives

Due to the nature of the provided services, in consideration of the requirements provided for by the Accountancy Act and the applicable statutory claim limitation period, we decided that data will be stored for 6 years as of the later of the following events: completion or termination of the agreement

between us, as of the last transaction, or as of the submission of any claim / complaint.

2. Correspondence

We do our best to remove the data of people with whom we exchange correspondence that is unrelated to the concluded agreements on an ongoing basis, at least once a year.

3. Job candidates

We do our best to remove the data of people with whom we have not started cooperation on an ongoing basis, at least once a year.

4. Employees

We store employee data within the terms prescribed by the applicable labor law regulations.

We would also like to clarify that the obligation to remove data means that we remove data which allows the unique identification of you as a natural person. However, anonymized data (i.e., data which does not contain such data as your given name, surname, PESEL number, phone number, etc.) may be further stored for statistical and research purposes, and for the purposes of enhancing our services.

Data protection officer

You can contact our data protection officer via email at gdpr@symmetrical.ai or by writing to:

Symmetrical – Data Protection Officer

Bartosz Kapuściński

Rozbrat 6/17

00-451 Warsaw

Poland

Moreover, you are always entitled to lodge a complaint concerning personal data to the President of the Personal Data Protection Office [www.uodo.gov.pl], i.e., the Polish authority supervising the observance of legal regulations on personal data protection.