



PRIVACY POLICY

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Background

Name od the document	Version	Admission date
Privacy policy	1.0	

Respecting your right to privacy, Billon Group which includes:

- Billon Sp. z o. o.
- Billon Solutions Sp. z o. o.
- Billon Digital Services Sp. z o. o.

(hereinafter: "Billon") processes your personal data in accordance with national and European legislation.

Billon ensures the security of your personal data, i.e. its confidentiality, availability, integrity, as well as the accountability of its operations. In order to make our processing transparent to you, within the framework of this privacy policy, we provide you with the most important information regarding the Administrator's processing of your personal data on the basis of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter: "GDPR").

Data Administrator

Administrator, i.e. the entity that decides on the purposes and means of processing personal data, is:

No.	Company	Purpose of processing
1.	Billon Sp. z o.o.	Contact
2.	Billon Solutions Sp. z o. o.	Contact, Electronic Money Service, Acquisition
3.	Billon Digital Services Sp. z o. o.	Contact, Trusted Document Service (Persistent Media), Digital Diploma Service, Acquisition

You may contact us on matters relating to the processing of your personal data through the communication channels listed below:

No.	Company	Adress	Email address
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1.	Billon Sp. z o.o.	Warszawa (00-021) Chmielna 25	kontakt@billongroup.com
2.	Billon Solutions Sp. z o. o.	Warszawa (02-901) pl. Bernardyński 2	kontakt@billonsolutions.com
3.	Billon Digital Services Sp. z o. o.	Warszawa (00-021) Chmielna 25	kontakt@billongroup.com

Billon pays particular attention to the protection of personal data and has therefore appointed a Data Protection Officer whom you can contact at iod@billonsolutions.com.

Data acquisition and purpose of processing

Depending on your relationship with us, in carrying out our business functions we process personal data for different purposes and to different extents in accordance with the table below:

No.	Purpose of processing and legal basis	Data scope	Data retention period
Billon Sp. z o. o., Billon Solutions Sp. z o. o., Billon Digital Services Sp. z o. o.			
1.	<p>With regard to persons who have directed an inquiry via the "Contact" tab (Contact Category) - to respond to your inquiry</p> <p>Legal basis for processing: article 6(1)(f) GDPR</p>	<p>Personal data are processed to the extent that they correspond to the purpose of the processing, and in particular are:</p> <ul style="list-style-type: none"> • e-mail address, • other personal data included in the request, • information gathered from publicly available sources such as sanction lists, politically exposed persons lists, etc. 	<p>Until you withdraw your consent or object, i.e. show us in any way that you do not wish to be contacted and informed about our activities. Once you have withdrawn your consent or made an objection, your personal data may be retained for the purpose of demonstrating correct compliance with Billon's legal obligations or until the expiry of the limitation periods for claims, whichever is longer.</p>
2.	<p>With respect to Candidates for Employment or Cooperation</p> <p>In order to take the steps necessary to enter into a contract, at your request</p> <p>Legal basis for processing: Article 6(1)(b) RODO</p> <p>To the extent required by law, in particular the Labour Code Legal basis for processing: Article 6(1)(c) GDPR, in order to carry out the recruitment process,,</p>	<p>As a rule, your personal data is not collected other than from you.</p> <p>Exceptionally, in the case of your prior consent, personal data has been provided to us by entities specializing in recruitment, as part of a referral system or by persons providing references. The categories of personal data obtained are:</p> <ul style="list-style-type: none"> • name, surname, 	<p>Your personal data will be processed for 3 months and, if you have consented to participate in further recruitments, until you withdraw it. If you are reasonably aware of the possibility of claims, your personal data will also be kept until the expiry of the limitation periods.</p>

	<p>If the Candidate provides other data than that required by law - on the basis of his/her consent, in order to carry out the recruitment process Legal basis for processing: Article 6(1)(a) GDPR</p> <p>If special category data is shared, also. Legal basis for processing: Article 9(2)(a) GDPR,</p> <p>In order to realize the legitimate interest of the Administrator to establish, pursue or defend against claims Legal basis for processing: Article 6(1)(f) GDPR.</p> <p>Where special category data is shared. Legal basis for processing: Article 9(2)(f) GDPR,</p> <p>Where additional consent is given - for consideration for future recruitment Legal basis for processing: Article 6(1)(a) GDPR.</p>	<ul style="list-style-type: none"> • contact information, • educational information, • employment history • other data provided by you in your application documents. 	
3.	<p>In order to ensure the safety of people on the organization's premises and to protect property Legal basis for processing: Article 6(1)(f) GDPR</p> <p>In order to establish, assert and defend claims</p>	<p>Personal data are processed to the extent that they correspond to the purpose of the processing, and in particular are:</p> <ul style="list-style-type: none"> • name and surname, • company name 	<p>Your personal data will be stored for up to three months, and if it is necessary for the establishment, investigation or defense of claims - until the final settlement of the asserted claims or the expiry of the period of limitation</p>

	<p>Legal basis for processing: Article 6(1)(f) GDPR;</p>		
4.	<p>In order to perform a contract with the Contracting Party or to take pre-contractual actions upon the Contracting Party's request</p> <p>Legal basis for processing: Article 6(1)(b) GDPR - if you are a Contracting Party; Article 6(1)(f) GDPR - if you are a person acting for or on behalf of a Contracting Party,</p> <p>For billing, accounting and financial reporting purposes.</p> <p>Legal basis for processing: Article 6(1)(c) and (f) GDPR.</p>	<p>As a general rule, we process the data you provide to us. If you have not provided us with your data, we have obtained it from our contractual partner or from a person acting on behalf of or for the benefit of our contractual partner. We obtain personal data to the extent necessary to enter into and perform the contract, the most common of which are:</p> <ul style="list-style-type: none"> • name, surname, • postal address, • e-mail address • telephone number, • order data, • invoice data. <p>In the case of concluding a written agreement, we also process your PESEL or ID card number. In case of cooperation in the computer system - also login, password and history of cooperation.</p>	<p>Your personal data will be stored for the period required by law or until the expiry of the statute of limitations for claims arising from the contract with you - whichever is longer.</p>

<p>5.</p>	<p>To ensure the functionality of the website and to facilitate the use of the website</p> <p>Legal basis for processing: article 6(1)(b) and (f) GDPR; for details on the use of cookies, see further in the policy,</p> <p>In order to comply with obligations arising from the law, in particular the Telecommunications Law and the Act on the provision of electronic services</p> <p>Legal basis for processing: Article 6(1)(c) GDPR.</p> <p>In order to realize the legitimate interest of the Administrator, consisting of marketing its own products and services</p> <p>Legal basis for processing: Article 6(1)(f) GDPR, and in the case of explicit consent - also products and services of companies cooperating with the Administrator (Article 6(1)(a) GDPR), using the following forms of communication:</p> <ul style="list-style-type: none"> - newsletter (newsletter mailing), - voice calls (telephone marketing), - sending commercial information (e-mail messages), - sending commercial information (text messages), - sending promotional materials by regular mail, <p>For the purposes indicated in the content</p>	<p>We process the data you provide to us. If you did not provide us with your data, the source of the data is [the entity that had your consent to provide it to the Administrator, or another valid legal basis]. In this case, the personal data obtained includes data necessary to conduct the type of marketing activities (typically name, surname, email address, telephone number and/or mailing address).</p>	<p>Your personal data will be stored until you withdraw your consent or object, i.e. show us in any way that you do not wish to be contacted and informed about our activities. After the withdrawal of consent or objection, personal data may be stored for the purpose of demonstrating the correct fulfillment of legal obligations incumbent on the Administrator or until the expiration of the statute of limitations for claims, whichever is longer. If a contract is concluded with the Administrator (e.g. with regard to the provision of electronic services or the use of an online store), personal data will be processed for the duration of the contract and, after its termination, until the expiry of the limitation periods for claims arising from it.</p>
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	<p>of consents to the processing of personal data - if such consents were expressed Legal basis for processing: Article 6(1)(a) GDPR.</p> <p>We also process personal data in connection with the pursuit of other legitimate interests of the controller</p> <p>Legal basis for processing: article 6(1)(f) GDPR:</p> <p>For the purpose of establishing, asserting and defending claims.</p> <p>For statistical purposes, related to the improvement of work efficiency, quality of provided services and their adjustment to the recipients.</p>		
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Billon Solutions Sp. z o.o.

6.	<p>In respect of persons to whom our Customers have given instructions for the transfer of Electronic Money and who have not collected the transfer (Collection Category):</p> <ul style="list-style-type: none"> ● inform you about the possibility of collecting Electronic Money, ● resolving potential complaints and disputes, asserting rights, and proving the legitimacy or defense of claims, ● ensure compliance with our obligations to conduct our business in compliance with the requirements for the issuance and 	<p>Personal data are processed to the extent that they correspond to the purpose of the processing, and in particular are:</p> <ul style="list-style-type: none"> ● e-mail address, ● other personal data included in the request, ● name and surname, telephone number, ● data relating to the electronic money transfer ordered for you, ● information collected from publicly available sources, such as 	<p>Until the expiration of the limitation periods for claims arising therefrom</p>
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	<p>redemption of Electronic Money, in particular your funds and the implementation of anti-money laundering and anti-terrorist financing provisions, which may include identifying and verifying your identity or the identity of your representatives and controllers and automatically checking Your identification on relevant sanctions lists</p> <ul style="list-style-type: none"> • comply with other legal requirements, including but not limited to keeping sales records for tax purposes or sending notices and other information as required by law, • maintaining the safety and security of our products, services and websites or other systems, preventing and detecting security risks, fraud and other criminal or harmful activities. <p>Legal basis for processing: Article 6(1)(b) GDPR</p>	<p>sanctions lists, politically exposed persons lists, etc.</p>	
<p>7.</p>	<p>With respect to persons who have entered into an Electronic Money Service Agreement (Service Provision Category):</p> <ul style="list-style-type: none"> • enable you to use the Virtual Electronic Money Account service and execute payment instructions you have requested, • resolving potential complaints and disputes, asserting rights, and proving the legitimacy or defense of 	<p>Personal data are processed to the extent that they correspond to the purpose of their processing, and in particular are:</p> <ul style="list-style-type: none"> • contact information such as name, phone number, email address, Virtual Electronic Money Account login, • Identity verification data (in case of KYC 	<p>Personal data will be processed for the duration of the contract and, after its termination, until the expiration of the limitation periods for claims arising therefrom.</p>

	<p>claims,</p> <ul style="list-style-type: none"> • ensure compliance with your obligation to conduct your business in accordance with the requirements for issuing and redeeming Electronic Money, in particular your funds and the implementation of anti-money laundering and anti-terrorist financing regulations, which may include identifying and verifying your identity or the identity of your representatives and administrators, and automatically checking your identification against applicable sanctions lists, • comply with other legal requirements, including but not limited to keeping sales records for tax purposes or sending notices and other information as required by law, • maintaining the safety and security of our products, services and websites or other systems, preventing and detecting security risks, fraud and other criminal or harmful activities, • monitor how you use the products, services and websites or other systems provided by us in order to optimize their functioning, • inform you, where permitted and lawful, within the current business relationship, of products and services offered by Billon that 	<p>/ KYB procedure) such as PESEL or date of birth, country of birth, nationality, residential address, scan or copy of ID card or passport, photo/facial image, company of business and NIP, REGON, PKD codes of business, number of permit, permission or license to conduct a specific activity,</p> <ul style="list-style-type: none"> • Financial operations data such as receipt and redemption of Electronic Money and other payment transactions completed, including money order transactions, bank account number, • information gathered from publicly available sources such as sanction lists, politically exposed persons lists, • if required for compliance purposes: information about material and significant litigation or other legal proceedings against you or a third party related to you and information about its relationship with you that may be relevant for antitrust purposes. 	
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	<p>are similar or related to those previously purchased or used within that business relationship.</p> <p>Legal basis for processing: Article 6(1)(b) GDPR</p>		
Billon Digital Services sp. z o.o.			
8.	<p>With respect to individuals who have consented to the provision of the Trusted Documents Service, including consenting to the provision of such service through another Entity using the Trusted Documents Service provided or delivered by Billon (Service Provision Category):</p> <ul style="list-style-type: none"> ● enable you to use the Trusted Document Service, ● resolving potential complaints and disputes, asserting rights, and proving the legitimacy or defense of claims, ● ensure compliance with the obligation to conduct business in accordance with the regulations of the Persistent Carrier, ● comply with other legal requirements, including but not limited to keeping sales records for tax purposes or sending notices and other information as required by law, ● maintaining the safety and security of our products, services and websites or other systems, preventing and detecting security risks, fraud and other 	<p>Personal data are processed to the extent that they correspond to the purpose of their processing, and in particular are:</p> <ul style="list-style-type: none"> ● contact information such as name, phone number, email address, login, ● Identity verification data (in case of KYC / KYB procedure) such as PESEL or date of birth, country of birth, nationality, residential address, scan or copy of ID card or passport, photo/facial image, company of business and NIP, REGON, PKD codes of business, number of permit, permission or license to conduct a specific activity, ● information gathered from publicly available sources such as sanction lists, politically exposed persons lists, ● if required for compliance purposes: information about material and significant litigation 	<p>Personal data will be processed for the duration of the contract and, after its termination, until the expiration of the limitation periods for claims arising therefrom.</p>

	<p>criminal or harmful activities,</p> <ul style="list-style-type: none"> • monitor how you use the products, services and websites or other systems provided by us in order to optimize their functioning, • inform you, where permitted and lawful, within the current business relationship, of products and services offered by Billon that are similar or related to those previously purchased or used within that business relationship. <p>Legal basis for processing: Article 6(1)(b) GDPR</p>	<p>or other legal proceedings against you or a third party related to you and information about its relationship with you that may be relevant for antitrust purposes.</p>	
9.	<p>With respect to individuals who have consented to the provision of Digital Diplomas, including consenting to the provision of such service by another Entity using the Digital Diploma Service provided or delivered by Billon (Service Provision Category):</p> <ul style="list-style-type: none"> • enable you to use the Digital Diploma Service, • resolving potential complaints and disputes, asserting rights, and proving the legitimacy or defense of claims, • ensure compliance with the obligation to conduct business in accordance with the regulations of the Persistent Carrier, • comply with other legal requirements, including but not limited to 	<p>Personal data are processed to the extent that they correspond to the purpose of their processing, and in particular are:</p> <ul style="list-style-type: none"> • contact information such as name, phone number, email address, login, • Identity verification data (in case of KYC / KYB procedure) such as PESEL or date of birth, country of birth, nationality, residential address, scan or copy of ID card or passport, photo/facial image, company of business and NIP, REGON, PKD codes of business, number of permit, permission or license to conduct a specific activity, 	<p>Personal data will be processed for the duration of the contract and, after its termination, until the expiration of the limitation periods for claims arising therefrom.</p>

	<p>keeping sales records for tax purposes or sending notices and other information as required by law,</p> <ul style="list-style-type: none"> • maintaining the safety and security of our products, services and websites or other systems, preventing and detecting security risks, fraud and other criminal or harmful activities, • monitor how you use the products, services and websites or other systems provided by us in order to optimize their functioning, • inform you, where permitted and lawful, within the current business relationship, of products and services offered by Billon that are similar or related to those previously purchased or used within that business relationship. <p>Legal basis for processing: Article 6(1)(b) GDPR</p>	<ul style="list-style-type: none"> • information gathered from publicly available sources such as sanction lists, politically exposed persons lists, • if required for compliance purposes: information about material and significant litigation or other legal proceedings against you or a third party related to you and information about its relationship with you that may be relevant for antitrust purposes. 	
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NOTE: There are also situations where our organization is the Data Processor and the Administrator is the entity on whose behalf we process the data. If such a situation occurs, you will receive information about the processing from that Administrator.

Detailed information about the processing of personal data on the website

Cookies

The website automatically collects only information contained in cookies. The Operator of the Website informs that Cookies are computer data, in particular text files which are stored in the final device of the Website User. Cookies usually contain the name of the website they come from, time of storage on the terminal equipment and a unique number. Cookies are used in order to:

- adapting the content of websites to user preferences and optimizing the use of websites; in particular, these files allow you to recognize the device of the service user and appropriately display the website, tailored to his individual needs;
- creating statistics that help to understand how users of the website use the websites, which allows to improve their structure and content;
- maintaining a website user session;

The following types of cookies are used within the Service:

- "essential" cookies that make it possible to use the services available on the Service, such as authentication cookies used for services that require authentication on the Service; security cookies, such as those used to detect misuse of authentication on the Service
- "performance" cookies that enable the collection of information about the use of the Service's websites;
- "functional" cookies that make it possible to "remember" the User's selected settings and personalize the User's interface, e.g. with respect to the selected language or region of origin of the User, font size, website layout, etc;
- "advertising" cookies that make it possible to provide Users with advertising content more tailored to their interests.

Web browsers (Service user software) by default allow the storage of cookies on the end device, Service user can always change the browser settings that determine the use of cookies. Restrictions on the use of cookies may affect the functionality of the Website. Cookies placed in the Service User's end device may also be used by Billion cooperating advertisers and partners. Billion informs that the entity responsible for placing cookies on the Website user's end device while having access to them is the Administrator. Administrator informs that information about how to use cookies is available in software settings (web browser). More information about cookies is available in the "help" section in the menu of your web browser.

Any user who does not agree to the use of cookies is obliged to modify the settings of his/her Internet browser. Configuration of the system to enable the use of cookies means consent to store the information referred to above by the Administrator, in accordance with Article 173 (2) of the Act of 16 July 2004. Telecommunications Law (Dz.U.2020.0.576).

Hotjar



We also use a tool called Hotjar that creates click maps, examines how engaged users are on a page (in terms of scrolling). The tool can also be used to record user behavior on the site.

Server logs

- Use of the Site involves sending requests to the server on which the Site is stored.
- Each query sent to the server is recorded in server logs. The logs include, among other things, the User's IP address, the date and time of the server, information about the Internet browser and the operating system used by the User.
- Logs are saved and stored on the server.
- Data saved in server logs are not associated with particular persons using the Website and are not used by the Administrator to identify the User.
- The server logs constitute only the auxiliary material used to administer the Website, and their content is not disclosed to anyone except persons authorized to administer the server.

Data recipients

In connection with its business, Billon will disclose your personal information to the following entities:

- a) state authorities or other entities authorized by law - if it is necessary for the performance of legal obligations,
- b) entities supporting us in our activities on our behalf, in particular: suppliers of external ICT systems supporting our activities, subcontractors, entities auditing our activities or experts, whereby such entities will process data on the basis of an agreement with the Administrator and only in accordance with his instructions,
- c) entities providing accounting, HR or legal services - to the extent necessary to ensure fulfillment of legal obligations or to establish, assert and defend claims,
- d) companies that dispose of or archive documents and other media - to the extent that data is stored in hard copy or on such media,
- e) to customers of the organization - if it is necessary to serve them,
- f) banks, insurance companies, and other financial and payment institutions - if necessary to carry out settlements,
- g) intermediaries, agents and representatives acting on behalf of the Organization.

Rights of any person whose data we process

Each person whose data is processed by the Controller has the right to:

- a) have access to their personal data,
- b) withdraw your consent to the processing of your personal data (provided that the withdrawal of your consent does not affect the lawfulness of the processing which you carried out on the basis of your consent before its withdrawal)
- c) rectify your personal data,
- d) have your personal data erased,
- e) limit the processing of your personal data,
- f) object to the processing of your personal data (in accordance with Article 21(1) GDPR, when lodging an objection, please indicate the reasons related to your particular situation),
- g) portability of your personal data.

Moreover, you have the right to lodge a complaint to the supervisory authority, i.e. the President of the Office for Personal Data Protection, more information at: <https://uodo.gov.pl/pl/p/skargi>.

Voluntariness of providing data

Providing data is necessary to conclude contracts and settlements of business and to comply with legal requirements by Billon. For the rest (in particular in order to process data by Billon for marketing purposes), providing data is voluntary.

Transfer of data to third countries or international organizations

Data will be processed in the European Economic Area, i.e. as a rule we do not transfer data to third countries. However, the transfer of data to a third country may take place only if (subject to other provisions of generally applicable law) the conditions for ensuring an adequate level of protection of natural persons guaranteed by the GDPR are met, e.g. a contract containing standard contractual clauses requiring a specific level of protection of personal data has been concluded with the entity receiving the data. However, a transfer to a third country may occur in specific situations, in particular where the transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the request of the data subject, as well as where the transfer is necessary for the conclusion or performance of a contract entered into in the interest of the data subject between the controller and another natural or legal person.

Processing of personal data by automated means

If your data will be subject to automated decision-making resulting in legal effects or similarly significant impacts, such decision-making will be carried out in

accordance with the terms of the terms of use, contract or consent clause, which we request in a separate statement.