

## PRIVACY POLICY

**Personal data controller:** Ready2Wash s.r.o., with registered office at Rybná 682/14, Staré Město, 110 00 Praha 1, ID number: 05335507, incorporated under the laws of the Czech Republic, registered in the Commercial Register at the Municipal Court in Prague under file no. 261957 (“**we**”). We provide our customers and their clients with marketplace and POS Terminal Devices (“**MobileApp**”) to provide services according to the concluded agreement with our distributors/car wash operators or according to the terms concluded when you create your profile in the MobileApp.

We process personal data in accordance with 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 (“**GDPR**”).

### A. PERSONAL DATA PROCESSED

In particular, we process data that you have provided to us or that we have obtained from your use of the MobileApp, during KYC process, communication with us, etc., as well as data derived from these data. Personal data are processed by us and gathered mainly through MobileApp, website or while providing services. Personal data are directly gathered from data subjects or through customer to which you are contractual party.

For the sake of clarity, we have divided the data processed by us into several categories, to which we refer in this document:

- **Identification data.** Name, surname, e-mail, password.
- **Contact details.** E-mail.
- **User information in MobileApp.** Identification of user, technical data (incl. location data) gathered through MobileApp about user during usage of MobileApp. These information are required to maintain your account in MobileApp.
- **Data in connection with fulfilment of the agreement.** Payment data, information about persons stipulated on invoices, requests, statistical data about fulfilment of agreement, range of provided services under the agreement if connected with specific natural person acting on behalf of the Customer.
- **Communication data.** Personal data provided by contacting us through our website and MobileApp.
- **Ready2Pay data (for KYC process).** Information about Ultimate Beneficial Owners (UBO) such as identification data, address, contact details, bank account details, title, residence, ID number, date of birth, photo of ID if revenue of the Customer is above specific amount, and other data required as stipulated in Ready2Pay onboarding form attached to the Agreement and in Onboarding Data Requirements required by Adyen.
- **Personal data processed during provision of Ready2Pay services.** We process information such as a method of use of the services (including chargebacks, etc.), the chosen frequency of disbursement of funds, statements of payments made, information on any discounts granted, details of our joint communications, the amount of remuneration for arranging these services, details of tax documents issued and information on the due date and payment or non-payment of invoices.

- **Payment data.** If we provide payment for our services as providers, we also process information about purchase, payment information, chargebacks, information necessary to prevent frauds, scoring etc.
- **Car plate numbers.** We process car plate numbers for the purpose of identifying users when MobileApp services are accessed using the car plate number as a reference.

## **B. PURPOSES OF THE PROCESSING OF PERSONAL DATA**

We process your personal data as a data controller for the processing purposes set out below, on the basis of the legal bases set out here, for a limited period of time and only to the extent described here.

### **B.1 Provision of services, launching Ready2Pay services**

We primarily process personal data to provide you with our services, to provide you with MobileApp and requested services, in particular when you register in the MobileApp, create a user account, contact us for further information, ensure KYC process when providing Ready2Pay services, launch of the Ready2Pay service, ensuring payment through our MobileApp. As part of this, we may also send you messages about the conclusion and performance of a contract, new product and service releases, payment reminders, etc.

For this purpose, we process your Contact details, User information in MobileApp, Data in connection with fulfilment of the agreement, Ready2Pay data (for KYC process), Personal data processed during provision of Ready2Pay services.

Payments are made via services of Adyen which is described in part C of this privacy policy. With Adyen, your information may also be shared due to the fact that separate agreement with Adyen is also concluded when Ready2Pay services are provided.

The legal basis for this processing is the performance of the contract between you and us and the need to take steps at your request before entering into the contract or, where you are not directly party to the contract (if you are, for example, an employee of our customer or person acting on behalf of customer), our legitimate interest in the performance of any contract entered into.

The data are processed for the duration of the concluded contract and for the period necessary for the performance of the obligations under such contract, or until the expiry of 10 years from last transaction according to mutual agreement concluded.

### **B.2 Ensuring payments in the MobileApp**

We need to process personal data to fulfil our service - to enable payment for services we provide. We will also process personal data for possible assistance with solving problems regarding payment or complaints. We also have access to some data for the billing of our remuneration. Adyen will process personal data to comply with its obligations under the law (mainly for anti-money laundering purposes).

For this purpose, we process Payment data.

The legal basis for this processing is performance of contract (provision of service) and fulfillment of legal duties. Data are processed for the duration of the service and thereafter for 3 years from the individual transaction. Personal data processed for compliance with legal obligations (anti-money laundering legislation) is processed for 10 years from the last provision of the service or transaction.

### **B.3 Protection of rights and duties and protection against frauds and misuse**

We may also process your data to protect us from frauds, money laundering and unauthorized use of our MobileApp and services and your services to ensure their safe use. Also, we may use personal information to protect our own claims.

For this purpose, we process your Contact details, User information in MobileApp, Data in connection with fulfilment of the agreement, Ready2Pay data (for KYC process), Personal data processed during provision of Ready2Pay services, Payment data.

The legal basis for this processing is our legitimate interest in protecting our rights and duties and protection against frauds and misuse.

We process the data until a maximum of 10 years after the end of the concluded contract. This period may be changed according to the current state and also according to the specific findings and caused frauds.

#### **B.4 Support and promotion of our products and services**

We may process the data you provide when you review, register, or purchase our services to inform you about our other products, services or promotions, news, announcements, new releases, etc.

For this purpose, we process your Contact details, User information in MobileApp, Data in connection with fulfilment of the agreement.

The legal basis for this processing is our legitimate interest in supporting and promoting our products and services. The data is processed until a maximum of 2 years after the termination of the contract concluded with you.

In addition to objecting to the processing of data for this purpose, you may opt out of receiving any newsletter at any time by using the unsubscribe links provided in the footer of each message sent.

#### **B.5 Fulfilling legal obligations**

We may also process your personal data in order to comply with our legal obligations, particularly in the area of taxes, accounting, AML and fraud detection. At the same time, we need to be prepared to provide cooperation to state authorities if we are required to do so by law.

For this purpose, we process your Contact details, User information in MobileApp, Data in connection with fulfilment of the agreement, Ready2Pay data (for KYC process), Personal data processed during provision of Ready2Pay services, Payment data.

The legal basis for this processing is the fulfilment of our legal obligations. Those data are processed for the period of time required by law.

#### **Processing related to the use of the MobileApp**

##### **B.6 Site operation and security (necessity)**

We process your personal data for the operation of the MobileApp and its security, i.e. for the presentation of information on the MobileApp, the internal functioning of the MobileApp, your identification as a Creator or Customer when browsing and repeated visits to the MobileApp, and for ensuring your security.

For this purpose, we process technical data when using MobileApp that may be stored in your browser.

The legal basis for this processing is our legitimate interest in the proper functioning and safe operation of our MobileApp. Data are processed, as a rule, for the duration of your visit to the MobileApp, for a maximum of 1 year from the date of collection.

### **C. SHARING OF PERSONAL DATA**

At the same time, we may share personal information with third parties who help us provide our products and services to you. These parties act as our data processors and will only process personal data for us, within the scope of our processing purposes set out above. Specifically, this includes:

- **Adyen N.V.**, a company registered in Amsterdam under number 34259528 and having its seat at Simon Carmiggeltstraat 6-50, 1011 DJ in Amsterdam, the Netherlands to secure payments.
- **Amazon Web Services Emea Sarl** providing Amazon Web Services where personal data from MobileApp are stored. Amazon company is registered under Data Privacy Framework: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000TOWQAA4&status=Active>.
- **Car wash operators** to which we provide services.
- **WolkAbout Technology s.r.o.**, having its seat at Václavské náměstí 841/3, 110 00 Prague 1, Czech Republic, which provides development, operations and support services.
- **Semptra D.O.O.**, having its seat at Nikole Tesle 42, Novi Sad, Serbia, which provides development, operations and support services.
- **Car wash machine manufacturer** which provides (machine) support services
- **Local distributor, subsidiary or service company of car wash machine manufacturer** which provides (machine) support services

In addition to this, we may share your personal data with certain third parties as data controllers for the purpose of "Fulfilling Legal Obligations" where we are obliged to do so under applicable legislation (in particular, administrative authorities, police authorities and judicial authorities). Similarly, we may be obliged to share your data with persons who claim to have been harmed by your conduct.

We also share your personal data with third parties as data controllers to help us process your payments for the services you have ordered as part of the purpose of "Provision of services and related information". These partners include Adyen company.

Moreover, your personal data can only be accessed at Ready2Wash by persons who are authorised to do so, and even then, only to the extent required in connection with the aforementioned purposes. Encryption is always used for transmitting data that is collected during registration or access to the Ready2Wash services.

Where we share your personal data with controllers and processors in third countries (outside the EEA), we only do so where there is a decision by the European Commission that a particular country outside the EEA provides an adequate level of data protection, including where controllers or processors have adopted additional data protection measures such as Binding Corporate Rules (BCRs) or Standard Contractual Clauses (SCCs).

### **D. YOUR RIGHTS IN PROCESSING AND THE POSSIBILITY OF EXERCISING THEM**

Just as we have rights and obligations when processing your personal data, you have certain rights when processing your personal data as set out in the following paragraphs. You have the right to (i) request access to your personal data; (ii) withdraw your consent; (iii) request rectification of your personal data; (iv) request erasure of your personal data; (v) request restriction of the processing of your personal data; (vi) request portability of your personal data; (vii) object to the processing of your personal data; or (viii) lodge a complaint with the relevant supervisory authority.

In all matters related to the processing of your personal data, whether it is a question, the exercise of rights, sending a complaint to our hands, etc., you can contact us at support [support@ready2wash.com](mailto:support@ready2wash.com).

Your request will be processed without undue delay, at most within 1 month. In exceptional cases, in particular due to the complexity of your request, we are entitled to extend this period by a further 2 months. We will, of course, always inform you of any such extension and the reason for it.

You also have the right to lodge a complaint with the supervisory authority as described below.

#### **D.1 Right of access**

You have the right to obtain confirmation from us as to whether or not we are processing your personal data. If we process your personal data, you also have the right to request access to information about the purpose and scope of the processing, the recipients of the data, the duration of the processing, the right to rectification, erasure, restriction of processing and to object to the processing, the right to file a complaint with a supervisory authority and the sources of the personal data (this information is already provided in this document). You can also ask us for a copy of the personal data we process. We provide the first copy free of charge; further copies may be subject to a fee. The scope of the data provided may be limited so as not to interfere with the rights and freedoms of others.

#### **D.2 Right to withdraw consent**

You have the right to withdraw your consent to the processing of personal data at any time. However, the withdrawal of consent does not affect the lawfulness of the processing prior to such consent, nor does it lead to the termination of the processing of personal data that has already been anonymized.

#### **D.3 Right to repair**

You have the right to request us to correct inaccurate personal data concerning you. Depending on the purpose of the processing, you may also have the right to have incomplete personal data completed, including by providing an additional declaration.

#### **D.4 Right to erasure (right to be forgotten)**

You have the right to request the deletion of your personal data in cases where:

- We no longer need your personal data for the purposes for which it was collected or processed;
- you withdraw the consent on the basis of which the personal data was processed and there is no further reason for processing it;
- you object to processing and there are no other overriding reasons for processing, or you object to processing for direct marketing purposes;
- personal data are processed in violation of the law.

However, you cannot exercise this right where the processing is necessary for compliance with our legal obligations or tasks entrusted to us in the public interest or for the establishment, exercise, or defense of legal claims.

#### **D.5 Right to restriction of processing**

You have the right to request restriction of the processing of your personal data in cases where:

- you contest the accuracy of your personal data; in this case, you may request a restriction of processing until the accuracy of the personal data has been verified;
- the processing is contrary to the law and instead of erasure, you request a restriction of the processing of personal data;
- We no longer need your personal data for the purposes for which it was collected or processed, but you require it for the establishment, exercise, or defense of legal claims;
- you have objected to the processing of your personal data; in this case, you may request a restriction of processing until it is verified that our legitimate interests prevail.

#### **D.6 Right to portability**

You have the right to obtain a copy of your personal data that we process by automated means on the basis of your consent or for the performance of a contract. We will transmit this data in a commonly used and machine-readable format to you or to a controller designated by you, if technically feasible. The scope of the data provided may be limited so as not to interfere with the rights and freedoms of others.

#### **D.7 Right to object**

You have the right to object to the processing of your personal data that we process on the basis of our legitimate interest. We will stop processing your data if there are no other overriding reasons for processing or if the processing is not necessary for the establishment, exercise, or defense of legal claims or if you object to processing for direct marketing purposes.

### **E. RIGHT TO FILE A COMPLAINT**

In addition to the possibility of exercising your rights with our company, you can also file a complaint with the relevant supervisory authority, which is the Office for Personal Data Protection located at Pplk. Sochora 27, 170 00 Prague 7.

### **F. CHANGES TO THIS INFORMATION**

This processing information is effective as of 01.06.2024.. We are entitled to change this processing information from time to time, so please check it regularly. We will post any changes to this document on our website.

