

INFORMATION CLAUSE

Below, we present information on the rules for processing your personal data by: SARL TOP MONAKO, with its registered office in Monaco, holding RCI Number ("Trade and Industry Register") 23 S 09495 and VAT number FR94000180124, located at Château Périgord I (Socle), 6 LACETS SAINT LEON, 98000 Monaco, with a share capital of 15,000.00 Euros, (hereinafter: "Administrator" or "Data Controller" or "SARL TOP MONAKO"). This information is provided based on Articles 13 and 14 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 (hereinafter referred to as: "GDPR").

DATA CONTROLLER AND CONTACT DETAILS

SARL TOP MONAKO, with its registered office in Monaco, holding RCI Number 23 S 09495 and VAT number FR94000180124, located at Château Périgord I (Socle), 6 LACETS SAINT LEON, 98000 Monaco, with a share capital of 15,000.00 Euros.

The Administrator has appointed a Data Protection Officer (DPO), who can be contacted via email at: dpo@zubau.com or by post at the address of the Data Controller's registered office. The DPO can be contacted regarding any issues related to the processing of personal data and exercising rights related to data processing.

PURPOSES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

Your personal data will be processed by the Administrator for the following purposes:

- a) To enable you to use the website <https://zubau.com/> (hereinafter: "Service") and the services provided by the Data Controller through it (the legal basis for processing is Article 6(1)(b) of the GDPR);
- b) To manage the registration process in the Service, i.e., the activity of creating an account as a Service user (hereinafter: "User"), logging into the User's account, or pursuing claims (the legal basis for processing is Article 6(1)(b) of the GDPR);
- c) To prevent fraud, including money laundering and other illegal activities (the legal basis for processing is Article 6(1)(c) of the GDPR);
- d) To ensure accountability in data processing (the legal basis for processing is Article 6(1)(c) of the GDPR);
- e) To explain circumstances of unauthorized use of electronic services (the legal basis for processing is Article 6(1)(c) of the GDPR);
- f) For direct marketing of products or services via electronic and telephone communications (the legal basis is your consent and Article 6(1)(a) of the GDPR);
- g) For direct marketing, including customer profiling (the legal basis is your consent and Article 6(1)(a) of the GDPR);
- h) To handle complaints and protect against claims by the Data Controller (the legal basis for processing is Article 6(1)(f) of the GDPR).

Your data may also be processed for secondary purposes (as long as they relate to SARL TOP MONAKO's activities and are connected with the above primary purposes) in the following areas

(the legal basis for processing is Article 6(1)(f) of the GDPR):

- a) Data archiving;
- b) Ensuring the proper functioning of the Service;
- c) Creating internal reports and analyses;
- d) Conducting internal audits;
- e) Generating statistics on page views;
- f) Adapting the Service to User needs;
- g) Creating User profiles based on prior history;
- h) Conducting statistical research;
- i) Providing business, economic, or legal advice to the Data Controller.

SOURCE OF PERSONAL DATA

Your data was obtained directly from you during the registration process and while using the Service.

Your data may also be obtained from external databases, based on voluntary consent to the transfer of such data. This data is used to support marketing and sales activities, i.e., to customize marketing approaches to individual Users, for profiling purposes, and for sending marketing communications.

TYPES OF PERSONAL DATA

Your personal data being processed includes:

- **Identifying information**, including: name, surname, PESEL number, ID number, type and form of employment, employer's address and contact information, financial situation data;
- **Contact details**, including email address and phone number;
- The Data Controller also collects information during your use of the Service. This data is collected automatically and includes, in particular:

a) Technical information such as details of the device you are using during your visit to the Service, network information, software, and Internet connection, browser type and version, time zone settings, browser plug-ins, platform and operating system, screen resolution, location, and font encoding;

b) Information regarding your visits to the Service, including the full URL (including date and time), products viewed or searched for, referrer/exit pages, files viewed, page response times, download issues, visit durations on specific pages, interaction data (scrolling, clicking, mouse movements), and page exit methods, date/time stamps, and user activity data. For more information on cookies, please refer to the Cookie Policy.

DATA RETENTION PERIOD

SARL TOP MONAKO will retain your personal data for the duration of your relationship with SARL TOP MONAKO. Data required to fulfill legal obligations will be retained for as long as required by law — legal basis under Article 6(1)(c) of the GDPR or for the period during which SARL TOP MONAKO may bear legal consequences for non-fulfillment — legal basis under Article 6(1)(f) of the GDPR.

DATA SUBJECT RIGHTS

You have the right to access your personal data, request correction, deletion, portability, or restriction of processing, as well as the right to withdraw consent.

RIGHT TO OBJECT

You may object to the processing of your personal data at any time, where the legal basis for processing is the legitimate interest of the Administrator or the public interest. In this case, upon reviewing your request, SARL TOP MONAKO will no longer process your data unless there are legitimate grounds for further processing or for the establishment, exercise, or defense of legal claims.

RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

You have the right to lodge a complaint with the supervisory authority, should you believe that the processing of your personal data violates legal provisions.

Commission de Contrôle des Informations Nominatives

Address: Le Concorde - 11 rue du Gabian, 98000 MONACO

Tel: (+377) 97.70.22.44

VOLUNTARY OR MANDATORY PROVISION OF DATA

In cases where personal data processing is required to enter into an agreement with SARL TOP MONAKO, the provision of your data is a condition for entering into this agreement. The provision of personal data is voluntary but necessary for the conclusion and execution of the agreement. If you do not provide the personal data, the agreement will not be concluded.

DATA RECIPIENTS

The Administrator may transfer personal data to entities processing data on its behalf, such as IT service providers, law firms, accounting, payroll service providers, archival, and tax services companies.

Data may also be transferred to relevant authorities and bodies as required by law, e.g., the President of the Personal Data Protection Office, the prosecutor's office, and the police.

TRANSFER OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

Your personal data may be transferred outside the European Economic Area in the context of the Administrator's use of service providers offering IT solutions that may store personal data on servers outside this area (including the United States) or in connection with the provision of services related to the Administrator's business operations. Transfers will occur if necessary, based on a European Commission adequacy decision or using appropriate legal safeguards, especially standard contractual clauses approved by the European Commission. Personal data may be transferred to a third country based on one of the criteria listed in Article 49(1) of the GDPR.