

## Data Protection Policy of Wortex LLC.

Wortex LLC is aware of the trust that you are putting in us. For this reason, we would like to comprehensively inform you about our approach to handling your personal data. In particular, we would like to inform you about what data is collected during your visit and / or the use of our web site and our online services, and what use they are subject to in detail.

Insofar as we have received personal data from you by other way (e.g. by e-mail or unsolicited application), the following data protection declaration also applies. We use various techniques on our website that are used to improve usability, effectiveness and safety. In this context, data collection may occur by us or third parties (technical service providers) employed and commissioned by us.

Last updated: 11/12/2020

### Definitions

- Enterprise - means Wortex, a registered enterprise.
- GDPR - means the General Data Protection Regulation.
- Responsible Person - means Violetta Chernik.
- Register of Systems - means a register of all systems or contexts in which personal data is processed by the Enterprise.

### 1. Data protection principles

The Enterprise is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific

or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;

- and processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## 2. General provisions

- This policy applies to all personal data processed by the Enterprise.
- The Responsible Person shall take responsibility for the Enterprise’s ongoing compliance with this policy.
- This policy shall be reviewed at least annually.
- The Enterprise shall register with the Information Commissioner’s Office as an organisation that processes personal data.

## 3. Lawful, fair and transparent processing

- To ensure its processing of data is lawful, fair and transparent, the Enterprise shall maintain a Register of Systems.
- The Register of Systems shall be reviewed at least annually.
- Individuals have the right to access their personal data and any such requests made to the Enterprise shall be dealt with in a timely manner.

## 4. Lawful purposes

- All data processed by the Enterprise must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- The Enterprise shall note the appropriate lawful basis in the Register of Systems.
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Enterprise’s systems.

## 5. Data minimisation

- The Enterprise shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## 6. Accuracy

- The Enterprise shall take reasonable steps to ensure personal data is accurate.
- Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## 7. Security

- Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- Enterprise securely stores personal data using modern software. Enterprise guarantees the personal data will be deleted after the first appeal.
- When personal data is deleted this should be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place.