

PERSONAL DATA PROTECTION POLICY of FUMBI NETWORK j. s. a.

under Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) and Slovak Act No. 18/2018 Coll. on Personal Data Protection

1. Introduction

FUMBI NETWORK j. s. a. takes the protection of personal data seriously. This Personal Data Protection Policy (the “Policy”) explains how we process personal data in connection with:

- the **technical operation of the FUMBI Platform**,
- the provision of **FUMBI Credit** to Users of the Platform,
- marketing communication carried out by FUMBI NETWORK j. s. a.

Terms used in this Policy that are not expressly defined have the meaning set out in the **Platform Terms of Use Agreement**, which governs the rights and obligations between FUMBI NETWORK j. s. a. and the User of the Platform in connection with the technical operation of the Platform and the provision of FUMBI Credit.

The FUMBI Platform serves as technological infrastructure. The Platform itself is not an investment service, a crypto-asset service or any other regulated financial service. Regulated services are provided separately by the relevant companies within the FUMBI group, in particular FUMBI, s. r. o. and FUMBI Wealth Management, o. c. p., a. s., as separate controllers of personal data.

2. Controller and contact details

The controller of personal data is:

FUMBI NETWORK j. s. a.

registered seat: Suché myto 6, 811 03 Bratislava – Staré Mesto district

Company ID: 52 005 895

registered in the Commercial Register of the City Court Bratislava III, Section: Sja, Insert No. 57/B

e-mail: info@fumbi.network

3. What personal data we process

We process mainly the following categories of personal data:

- **Data concerning the User of the Platform’s user account and use of the Platform:** e-mail address, account identifiers, technical settings, login logs.
- **Communication data:** data provided when communicating with FUMBI NETWORK j. s. a. in connection with the technical operation of the Platform or the administration of FUMBI Credit.

- **Data related to FUMBI Credit within the meaning of the Platform Terms of Use Agreement:** data necessary for the recording, use and control of FUMBI Credit within the Platform.
- **Technical data and cookies:** IP address, device and browser type, cookies and similar technologies.

FUMBI NETWORK j. s. a. does not process personal data for the purpose of providing crypto-asset services or investment services. However, to the extent set out in the Platform Terms of Use Agreement, it may obtain, record and disclose documents concerning the origin of funds or the use of FUMBI Credit to companies within the FUMBI group, in particular FUMBI, s. r. o. and FUMBI Wealth Management, o. c. p., a. s., where such documents are necessary for their own assessment or for compliance with their legal obligations.

4. Purposes and legal bases of processing

We process personal data only to the extent necessary for the following purposes:

A) Operation of the Platform

- purpose: creation and administration of the user account, ensuring the functionality of the Platform
- legal basis: **performance of a contract** (Article 6(1)(b) GDPR)

B) FUMBI Credit

- purpose: recording, drawing, use, control and settlement of FUMBI Credit, including the possible disclosure of data to companies within the FUMBI group when FUMBI Credit is used, as well as obtaining, recording and disclosing documents concerning the origin of funds or the use of FUMBI Credit in cases set out in the Platform Terms of Use Agreement
- legal basis: **performance of a contract** (Article 6(1)(b) GDPR), **legitimate interest** of FUMBI NETWORK j. s. a. or companies within the FUMBI group in preventing misuse of the Platform, proper administration and settlement of FUMBI Credit and disclosure of documents necessary for their own assessment or compliance with their legal obligations (Article 6(1)(f) GDPR), or compliance with a **legal obligation**, where such obligation applies to FUMBI NETWORK j. s. a. (Article 6(1)(c) GDPR)

C) Security of the Platform

- purpose: protection of IT infrastructure, prevention of misuse, incident handling
- legal basis: **legitimate interest** (Article 6(1)(f) GDPR)

D) Communication related to the operation of the Platform and FUMBI Credit

- purpose: communication related to the technical operation of the Platform and the administration of FUMBI Credit
- legal basis: **performance of a contract** and/or **legitimate interest**

E) Marketing of FUMBI NETWORK j. s. a.

- purpose: informing about products and services of FUMBI NETWORK j. s. a., satisfaction surveys
- legal basis: **legitimate interest** or **consent**, depending on the communication channel used and cookie settings; marketing communication is sent mainly to existing Users of the Platform to a reasonable extent; where required by law or by the use of a specific tool, the processing is based on consent
- unsubscribe: at any time via the link in the message or by e-mail at info@fumbi.network

F) Marketing for companies within the FUMBI group

FUMBI NETWORK j. s. a. may, on the basis of a contract, carry out marketing activities for companies within the FUMBI group, in particular FUMBI, s. r. o. and FUMBI Wealth Management, o. c. p., a. s., as a processor of personal data. In such case, the controller of personal data is the relevant company within the FUMBI group and details of the processing are provided in its own personal data protection policy.

5. Recipients of personal data

Personal data may be disclosed to:

- providers of IT, hosting, analytics and marketing tools,
- companies within the FUMBI group, in particular FUMBI, s. r. o. and FUMBI Wealth Management, o. c. p., a. s., where necessary for the operation of the Platform, administration, use or settlement of FUMBI Credit, marketing or disclosure of documents concerning the origin of funds or the use of FUMBI Credit,
- public authorities, where required by law.

If personal data are transferred outside the European Union or the European Economic Area, we ensure that such transfer is carried out in accordance with the GDPR and with appropriate safeguards for the protection of personal data.

6. Cookies and similar technologies

FUMBI NETWORK j. s. a. is the **controller of cookies** used on the Platform, including its web interfaces. We use cookies for:

- ensuring the basic functionality and security of the Platform,
- analytics and improving the user experience,
- marketing and personalisation of content, if you have given consent.

Necessary cookies are always used; other categories of cookies are used only to the extent of your consent.

Detailed information about individual categories of cookies and their purpose, as well as the option to **set your preferences**, for example consent or refusal for analytical or marketing cookies, is available

through the cookie settings directly on the Platform, via the “**Cookie Settings**” button or a similar option in the cookie banner.

7. Retention period

We retain personal data only for the period necessary to fulfil the purposes for which they were obtained and subsequently for the period required by legal regulations or necessary to protect our legal claims.

Data concerning the user account and use of the Platform are retained for the duration of the user account and subsequently for the period necessary for its cancellation, settlement of mutual rights and obligations and protection of legal claims.

Data related to FUMBI Credit are retained for the duration of the user account and for the period necessary for the recording, settlement and control of FUMBI Credit.

Data contained in accounting, tax and other legally required documents are retained for the period set by applicable legal regulations.

Communication, technical and security data are retained for the period necessary to handle communication, ensure the operation of the Platform, resolve incidents and protect legal claims.

Documents concerning the origin of funds that FUMBI NETWORK j. s. a. obtains and discloses to the relevant company within the FUMBI group are retained only for the period necessary to obtain and disclose them and to demonstrate that this procedure was carried out, unless legal regulations require a longer retention period.

Data processed on the basis of consent are retained until consent is withdrawn or until the expiry of the period for which consent was granted.

Cookies and similar technologies are retained according to the type of cookies and the settings specified in the cookie banner or in the cookie settings on the Platform.

8. Rights of data subjects

The data subject has the right to request access to personal data, rectification, erasure, restriction of processing, the right to object to processing based on legitimate interest, as well as the right to data portability, where the conditions under the GDPR are met.

You have the right to lodge a complaint with the competent data protection supervisory authority if you believe that the processing of your personal data is not in compliance with the GDPR or that your rights are not being respected.

Contact details of data protection supervisory authorities in all EU Member States are available at: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

You may exercise your rights by e-mail at **info@fumbi.network**.

9. Security

We adopt appropriate technical and organisational measures to protect personal data against unauthorised access, loss or misuse, including encrypted communication and security measures at the infrastructure level.

10. Changes to the Policy

We may update this Policy. The current version will always be available on the Platform or on the relevant website.

This Personal Data Protection Policy is effective as of: **1 August 2026**.