

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

pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) and 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 Platform Users**,
- marketing communications carried out by FUMBI NETWORK j. s. a.

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

Notice:

As of 31 December 2025, FUMBI NETWORK j. s. a. does not provide crypto-asset services. Personal data processed in connection with the provision of crypto-asset services are processed by **FUMBI, s. r. o.** as an independent controller, in accordance with its own Personal Data Protection Policy.

2. Controller and Contact Details

The controller of personal data is:

FUMBI NETWORK j. s. a.

Registered office: Suché mýto 6, 811 03 Bratislava – Staré Mesto, Slovak Republic

Company ID (IČO): 52 005 895

Registered in the Commercial Register of the Municipal Court Bratislava III, Section: Sja, File No.: 57/B

E-mail: info@fumbi.network

3. Categories of Personal Data We Process

We process in particular the following categories of personal data:

- **Platform User account and Platform usage data:** e-mail address, account identifiers, technical settings, login logs.
- **Communication data:** data provided in communications with FUMBI NETWORK j. s. a. in connection with the technical operation of the Platform or the administration of FUMBI Credit.

- **FUMBI Credit-related data** pursuant to 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 AML/KYC purposes or any other data related to the provision of crypto-asset services.**

4. Purposes and Legal Bases of Processing

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

A) Platform Operation

- **Purpose:** creation and management of user accounts, ensuring the functionality of the Platform
- **Legal basis:** performance of a contract (Article 6(1)(b) GDPR)

B) FUMBI Credit

- **Purpose:** recording, use and control of FUMBI Credit, including necessary communication related to its administration
- **Legal basis:** performance of a contract (Article 6(1)(b) GDPR), or, where applicable, compliance with a legal obligation (Article 6(1)(c) GDPR)

C) Platform Security

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

D) Communication Related to Platform Operation 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 primarily to existing Platform Users in a reasonable scope; where required by law or by the use of a specific tool, processing is based on consent)
- **Opt-out:** at any time via a link in the message or by e-mail to info@fumbi.network

F) Marketing for FUMBI, s. r. o.

FUMBI NETWORK j. s. a. may, on the basis of a contractual arrangement, provide marketing activities for **FUMBI, s. r. o. as a processor of personal data.**

5. Recipients of Personal Data

Personal data may be disclosed to:

- providers of IT, hosting, analytics and marketing tools,
- companies within the FUMBI group, where necessary for the operation of the Platform or marketing activities,
- public authorities, where required by law.

Where personal data are transferred outside the European Union or the European Economic Area, we ensure that such transfers are carried out in accordance with GDPR and subject to appropriate safeguards.

6. Cookies and Similar Technologies

FUMBI NETWORK j. s. a. acts as the controller of cookies used on the Platform (including its web interfaces). Cookies are used for:

- ensuring the basic functionality and security of the Platform,
- analytics and improvement of user experience,
- marketing and content personalisation, where consent has been granted.

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

Detailed information about individual cookie categories and their purposes, as well as the possibility to set your preferences (e.g. consent to or refusal of analytics or marketing cookies), are available via the **cookie settings** directly on the Platform (the “Cookie Settings” button or an equivalent option in the cookie banner).

7. Data Retention

Personal data are retained only for the period necessary to fulfil the purposes of processing, in particular:

- for the duration of the contractual relationship,
- for statutory retention periods (accounting, tax),
- for limitation periods applicable to the protection of legal claims.

8. Rights of Data Subjects

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

You have the right to lodge a complaint with the competent data protection authority if you believe that we process your personal data inconsistently with the GDPR or do not respect your rights.

Contact details of data protection 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 implement appropriate technical and organisational measures to protect personal data against unauthorised access, loss or misuse, including encrypted communication and infrastructure-level security measures.

10. Changes to the Policy

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

This Personal Data Protection Policy is effective as of: 31 December 2025.