



ROYAL MARKET

PRIVACY POLICY

1. THE ROYAL MARKET EU s.r.o., ID: 07418337, with registered office at Vaclavske namesti 832/19, 110 00 Prague 1 – Nove Mesto, registered in the Commercial Register under C 300699 administered by the Municipal Court in Prague

(the "**Company**" hereinafter).

1. INTRODUCTION

When processing personal data, the Company is governed by the relevant legislation on the protection of personal data, in particular 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 (General Data Protection Regulation) ("GDPR").

By confirming your consent to the processing of your personal data when using THE ROYAL MARKET platform (the "Platform" hereinafter), you allow the Company to use your personal data to the extent necessary for the use of the Platform.

This policy sets out the basic principles by which the Company processes personal data of users of the Platform and sets out its responsibilities in processing personal data. This policy fulfils the Company's information obligation to data subjects within the meaning of Article 13 of the GDPR.

2. INFORMATION ON PERSONAL DATA PROCESSING



The Company hereby provides you with information about your rights related to the processing of your personal data by the Company in connection with your use of the Platform, including the possibility of using other software platforms of the Company ("Processing Ground").

The Company is the data controller, i.e. the person who determines the purposes and means and decides on the processing of your personal data.

The processing of your personal data is carried out by the Company on the basis of your consent to the processing of your personal data by the Company for one or more Reasons for Processing, as the case may be. You have the right to withdraw your consent to the processing of your personal data at any time.

The processing of your personal data is carried out by the Company in relation to a specific Reason for Processing. The processing of your personal data is carried out so that the Company can provide you with services related to the specific Reason for Processing in the highest possible quality. Your personal data are processed by the Company from the time you give your consent to the processing until the time that consent is withdrawn. Thereafter, the Company only retains your data for a period of necessary to ensure the technical removal of your data from the Company's databases. The Company only retains those of your personal data that are necessary for the exercise of the Company's rights and performance of the Company's obligations or where required by law. The processing of your personal data does not involve automated decision-making or profiling that would have legal consequences for you or affect you in a similarly significant way.

The Company only processes personal data to the extent necessary for the use of the Platform and to the extent specified in the contract, the subject of which is, among other things, the use of the Platform.

These personal data are included by the Company in a database related to the Reason for Processing, is further recorded by the Company in the database and is used only for the purpose related to the Reason for Processing in order to provide the highest quality of services.



The Company shall treat your personal data with due care and in accordance with the applicable law. The Company shall protect your personal data to the maximum extent possible consistent with the technical level of the means available. The Company has strict rules governing which specific person or department may have access to your personal data and what personal data they may process. In the event that your personal data are transferred outside the Company to external processors, the Company has ensured an adequate level of security protection in accordance with the relevant legislation.

As a matter of principle, the Company does not pass on your personal data to anyone outside the Company and the Company Group, except where:

- it is necessary for the performance of the contract, in particular to ensure the full functionality of the use of the Platform,
- the Company has your express consent,
- the Company is required or authorized to do so by law (for example, by law enforcement authorities),
- one of the agendas is provided for the Company by an external processor (the Company does not transfer your personal data to countries outside the European Union and the EEC).

You have the rights in relation to your personal data specified in Article 6 below. You also have the right to withdraw your consent to the processing of your personal data at any time, including separately for any of the Processing Reasons. You can withdraw your consent simply by sending an email to the Company at info@royalcc.market.

Your data protection rights are fully respected by the Company. Should you exercise them, or should you have any questions regarding the Company's processing of your personal data, please contact the Company directly through the following communication channels:

Email: info@royalcc.market

Address: THE ROYAL MARKET EU s.r.o., Václavské náměstí 832/19, Nove Mesto, 110 00 Praha 1 – Nove Mesto, Czech Republic.



3. PURPOSE OF PERSONAL DATA PROCESSING

Personal data are processed for the following purposes:

- 1) use of the Platform and performance of the contract, the subject of which is, among other, the use of the Platform – if you are a customer of the Company (investor), the Company needs to keep certain information for the purpose of contract performance.
- 2) Own marketing – own marketing means that the data are used for the Company's promotional activities to existing customers, in search of potential customers and other target groups.
- 3) Compliance with legal obligations – certain data and documents are retained by the Company as required by specific legislation (tax laws, accounting laws, etc.).
- 4) Protecting legitimate interests – the Company also retains certain data and documents in the event of potential disputes, for the purpose of defending and proving itself in such disputes or in pursuing and enforcing its own claims.

The above purposes entitle the Company to process your personal data for a limited period of time without your consent if you are a customer (investor) or business partner.

4. GENERAL PRINCIPLES FOR PERSONAL DATA PROCESSING

4.1 Legality, Fairness & Transparency

The Company processes personal data lawfully, fairly and transparently in relation to the data subject.

4.2 Limitation by Purpose



Personal data are collected by the Company only for specific, explicit and legitimate purposes and is not further processed in a way that is incompatible with those purposes.

4.3 Data Minimizing

The Company processes personal data to the extent proportionate, only relevant and limited in relation to the purpose for which it is processed.

4.4 Accuracy

The Company processes personal data accurately to the extent objectively possible and updates them where necessary. The Company has internal processes in place to ensure that Personal Data that are inaccurate in relation to the purposes for which they are processed are rectified or erased.

4.5 Limited Retention Period

Personal data are retained for no longer than is necessary for the purposes for which they are processed. This period must take into account the possibility of ensuring the Company's obligations under the law (e.g. mandatory archiving), legal relationships (e.g. warranty period) and unlawful situations (e.g. compensation for damages) that may arise in relation to data subjects and the claims related to these obligations.

In general, the company processes personal data for a period of 10 years from the end of the performance of the contract, the subject of which is, inter alia, use of the Platform for the purpose of settling any claims for damages and claims for defective performance. During this period, the Company may also use the personal data for direct marketing.

4.6 Integrity & Confidentiality



Taking into account the state of the art and available security measures, the cost of implementation and the likelihood and severity of privacy risks, the Company uses appropriate technical and organizational measures to ensure adequate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage. These measures include both physical means of protection of personal data processed and electronic security of electronically processed data.

4.7 Liability

The Company, as the data controller, is responsible for and must be able to demonstrate compliance with the above principles.

4.8 Risk-based Approach

The greater the risk that the type of processing carried out by the Company may interfere with the interests or fundamental rights and freedoms of the data subject, the greater the measures to be taken to ensure the transparency and security of that processing.

5. DATA PROTECTION IN PROCESSING

In order to demonstrate the compliance with these principles, the Company should implement data protection in its processes and activities.

The Company shall collect as little personal data as possible.

The Company maintains the accuracy, integrity, confidentiality and relevance of personal data based on the purpose of processing. In order to prevent the theft, misuse or abuse of



personal data and to prevent personal data breaches, adequate security measures designed to protect personal data are applied.

Whenever the Company uses a third party, supplier or business partner, to process Personal Data on its behalf, it shall always ensure that the processor provides sufficient security measures to protect Personal Data appropriate to the risks involved. A questionnaire on the processor's compliance with the requirements of the GDPR may be used for this purpose.

The Company shall contractually oblige the supplier or business partner to provide the same level of data protection as the Company itself provides. The supplier or business partner must only process personal data to fulfil its contractual obligations to the Company or on the Company's instructions and not for any other purpose. If the Company processes personal data jointly with independent third parties, the Company must enter into a data processing agreement or similar agreement with the supplier or business partner.

6. YOUR RIGHTS TO YOUR DATA

6.1 Right of Access

The Company offers you access to your personal data that it processes. This means that you can contact the Company and the Company will inform you of what personal data it has collected and processed and the purposes for which such data are used.

6.2 Right to Rectification

You have the right to have any inaccurate, incomplete, outdated or unnecessary personal data held about you by the Company corrected or completed after you contact the Company. In some cases where the Company uses official data, we may ask you to contact the relevant authority directly to request that your data be corrected to ensure that the correction is carried out in the proper official manner necessary for such records.



6.3 Right to Erasure (Right to Be Forgotten)

You may ask the Company to erase your personal data from the Company's systems and records. The Company will comply with this request unless it has a legitimate reason for retaining the data.

6.4 Right to Object

You may object to certain uses of your data where such data have been processed for purposes other than those necessary for the performance of the Company's services or to comply with legal obligations. You may also object to any further processing of your personal data after your prior consent has been given, or you may withdraw your previously given consent at any time. If you object to any further processing of your personal data, this may result in narrowing of your ability to use the Company's services.

You have the right to prohibit the Company from using your personal data for direct marketing, market research and profiling purposes.

6.5 Right to Restrict the Processing

You may ask the Company to restrict the processing of certain personal data. However, this may lead to narrowing the use of the Company's services.

6.6 Right to Data Portability

You have the right to receive the personal data you have provided to the Company in a structured and commonly used format. The Company notes that this only applies to data



that you have personally provided directly to the Company, and the Company processes them either with your consent or for the purpose of performing a contract.

6.7 How to Exercise These Rights

These rights may be exercised in person at the Company's registered office, by registered letter or by emailing to info@royalcc.market.

You have the right to request a copy of the information the Company holds about you. If you would like a copy of some or all of your personal information, please send an email or letter to the Company at the following addresses:

Email: info@royalcc.market

Address: THE ROYAL MARKET EU s.r.o., Václavské náměstí 832/19, Nove Mesto, 110 10 Praha 1 - Nove Mesto.

6.8 Right to File a Claim with the Office for Personal Data Protection

If you are dissatisfied with the way your data are handled, you have the right to lodge a complaint with the competent data protection authority: in the Czech Republic, the Office for Personal Data Protection, ID: 70837627, with the registered office at: Pplk. Sochora 27, 170 00 Praha 7, Czech Republic (www.uoou.cz).