

LEGITAM P.S.A.

PRIVACY POLICY — WEBSITES

for the legit.am and legal.legit.am websites and the privacy.legit.am portal

Controller: Legitam Prosta Spółka Akcyjna ("Legitam P.S.A."), with its registered office at ul. Weselna 5, 46-300 Świercze, Poland.

Document version: 1.0 / 2026 (replaces the version dated 10 April 2026)

Effective date: 28 August 2026

Language Versions and Interpretation

These documents are provided in English, Italian, French, Polish, and German for your convenience.

For Consumers: In the event of any material discrepancy between the language versions, the version in the official language of your country of residence (or the language in which you concluded the agreement) shall prevail for the purpose of interpretation, ensuring that your rights under mandatory local consumer protection laws are fully preserved.

For Non-Consumers (B2B): The English version shall be the sole governing and legally binding version for the purpose of interpretation.

In all cases, nothing in this clause shall limit or exclude any mandatory rights granted to you by the applicable law of your country of residence.

Relationship to other documents: This Privacy Policy covers only personal data processed in connection with the use of the **websites** legit.am, privacy.legit.am and legal.legit.am. The processing of data of **Legitam Mobile Application** Users (Account, community content, telemetry data, device identifiers) is governed by a separate Privacy Policy — Mobile Application, available at legal.legit.am/privacy-policy.html. The detailed rules on the use of cookies are set out in the Cookie Policy.

§1. DATA CONTROLLER

1.1. The controller of personal data within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "GDPR") is Legitam Prosta Spółka Akcyjna, with its registered office at ul. Weselna 5, 46-300 Świercze, Poland.

1.2. The Controller has appointed a Data Protection Officer, who may be contacted on all matters concerning the processing of personal data and the exercise of rights under the GDPR: dpo@legit.am.

1.3. For other privacy-related matters, the address privacy@legit.am is available.

§2. SCOPE

2.1. This Policy applies to the Controller's three websites:

- **legit.am** — an informational and marketing site containing, among other things, a contact form and information about the products and services of Legitam P.S.A.;
- **privacy.legit.am** — a portal for managing the Account, submitting Account deletion requests and requests to exercise GDPR rights, and for making legal documents available;
- **legal.legit.am** — the site publishing the legal documents of the Legitam ecosystem; it contains no forms and no cookies and stores the selected language version only in the browser's local storage (localStorage).

2.2. This Policy **does not apply** to data processed in the Legitam Mobile Application. A separate Privacy Policy — Mobile Application applies to the Application. Where a User uses both the websites and the Application, both documents apply, each within its own scope.

2.3. The Controller's websites may contain links to third-party services (including the App Store, Google Play, and social-media profiles). The Controller is not responsible for the privacy practices of those services — see §12.

§3. DATA COLLECTED

3.1. Data provided voluntarily by the User

- **Contact form / business enquiries** (legit.am): first and last name or company name, e-mail address, optionally telephone number and job title, the content of the message, and any attachments.
- **E-mail correspondence** sent to the Controller's addresses: the data contained in the body of the message and in the sender's signature.
- **Requests submitted through the privacy.legit.am portal**: the e-mail address associated with the Account and the data necessary to verify the User's

identity and handle the request (for example, Account deletion or the exercise of GDPR rights).

3.2. Data collected automatically

- **Server logs:** IP address, date and time of the request, the URL of the requested resource, the HTTP response code, browser and operating system information (user agent), and the referring page (referrer).
- **Analytics data** (only after consent to analytical cookies has been given): the number and duration of visits, pages viewed, traffic source, approximate geographic location derived from the IP address, and device and browser type.
- **Cookies and similar technologies:** their scope and purposes are described in the Cookie Policy.

The Controller does not collect special categories of personal data (Article 9 GDPR) through its websites and asks that such data not be included in forms or correspondence.

§4. PURPOSES AND LEGAL BASES FOR PROCESSING

Purpose of processing	Legal basis
Responding to an enquiry submitted via the contact form or by e-mail, and conducting correspondence	Article 6(1)(b) GDPR (steps prior to entering into a contract) or Article 6(1)(f) GDPR (legitimate interest — handling enquiries)
Assessing opportunities for commercial cooperation and contacting a prospective business partner	Article 6(1)(f) GDPR (legitimate interest — direct marketing of the Controller's own products and services)
Handling an Account deletion request or a request to exercise GDPR rights submitted through the privacy.legit.am portal	Article 6(1)(c) GDPR (legal obligation under Articles 12 and 15–22 GDPR)

Website traffic analytics and statistics (Google Analytics)	Article 6(1)(a) GDPR (consent given via the cookie banner)
Ensuring the security and stability of the websites, detecting abuse, and maintaining server logs	Article 6(1)(f) GDPR (legitimate interest — security of IT systems)
Establishing, pursuing, or defending claims	Article 6(1)(f) GDPR (legitimate interest)
Complying with obligations arising from law (including tax and accounting obligations)	Article 6(1)(c) GDPR

§5. RETENTION PERIODS

Category of data	Retention period
Contact-form enquiries and e-mail correspondence	12 months from the end of the correspondence; where cooperation is established, for its duration and until the applicable limitation periods for claims expire
Requests submitted through the privacy.legit.am portal	for the period necessary to handle the request, and thereafter for 3 years in order to demonstrate accountability (Article 5(2) GDPR)
Server logs	up to 12 months, unless longer retention is necessary in connection with a security incident

Analytics data in Google Analytics	in accordance with the retention setting in the tool, and no longer than 14 months
Cookies	in accordance with the periods set out in the Cookie Policy (up to 13 months)
Data processed on the basis of consent	until consent is withdrawn

§6. RECIPIENTS OF DATA

6.1. The Controller does not sell personal data. Data may be disclosed to the following categories of recipients:

- **Hosting and server infrastructure provider** — for the storage of website data and logs;
- **E-mail service provider** — for handling correspondence;
- **Google Ireland Limited / Google LLC** — for the Google Analytics service, only after consent to analytical cookies has been given;
- **IT and technical support providers** — for the maintenance and development of the services;
- **Legal, tax, and accounting advisers** — to the extent necessary to provide services to the Controller;
- **Public authorities** — only where the obligation to disclose arises from law.

6.2. Entities processing data on the Controller's behalf act under data processing agreements meeting the requirements of Article 28 GDPR.

§7. TRANSFERS OF DATA OUTSIDE THE EEA

7.1. As a rule, data is processed within the European Economic Area.

7.2. The use of Google Analytics may involve the transfer of data to Google LLC, based in the United States. The transfer takes place on the basis of the European Commission's adequacy decision of 10 July 2023 concerning the EU–US Data Privacy

Framework and, additionally, on the basis of standard contractual clauses (Article 46(2)(c) GDPR).

7.3. A User may obtain a copy of the safeguards applied to the transfer by contacting the Data Protection Officer at dpo@legit.am.

§8. USER RIGHTS

8.1. Users have the following rights:

- the right of access to their data and to obtain a copy of it (Article 15 GDPR);
- the right to rectification (Article 16 GDPR);
- the right to erasure (Article 17 GDPR);
- the right to restriction of processing (Article 18 GDPR);
- the right to data portability (Article 20 GDPR) — in respect of data processed by automated means on the basis of consent or a contract;
- the right to object to processing based on the Controller's legitimate interest, including direct marketing (Article 21 GDPR);
- the right to withdraw consent at any time, without affecting the lawfulness of processing carried out before its withdrawal (Article 7(3) GDPR).

8.2. Requests should be sent to dpo@legit.am. The Controller responds without undue delay and no later than within one month of receiving the request; in complex cases this period may be extended by a further two months, of which the User will be informed.

8.3. Users have the right to lodge a complaint with the supervisory authority — the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych), ul. Stawki 2, 00-193 Warsaw, Poland.

8.4. In accordance with Article 77 GDPR, the User may also lodge a complaint with the supervisory authority of the Member State of their habitual residence or place of work, in particular: in France — the Commission Nationale de l'Informatique et des Libertés (CNIL, www.cnil.fr); in Germany — the data protection authority of the federal state (Land) in which the User resides, or the Federal Commissioner for Data Protection and Freedom of Information (BfDI, www.bfdi.bund.de); in Italy — the Garante per la protezione dei dati personali (www.garanteprivacy.it).

§9. VOLUNTARY NATURE OF PROVIDING DATA

Providing personal data is voluntary but necessary in order to use certain functions: without an e-mail address it is not possible to respond to an enquiry submitted through the contact form, and without data identifying the Account it is not possible to handle a request submitted through the privacy.legit.am portal. Consent to analytical cookies is entirely voluntary and does not affect the ability to use the websites.

§10. DATA SECURITY

10.1. The Controller applies technical and organisational measures appropriate to the risk to the rights and freedoms of data subjects, including: encryption of transmission using the TLS protocol (HTTPS), access control based on the principle of least privilege, regular software updates, and backups.

10.2. Despite these measures, the transmission of data over the internet is not entirely secure, and the Controller cannot guarantee the complete security of data transmitted to the websites.

10.3. In the event of a personal data breach resulting in a high risk to the rights or freedoms of natural persons, the Controller will notify the data subjects in accordance with Article 34 GDPR.

§11. COOKIES

The rules on the use of cookies and similar technologies, the categories of cookies used, their validity periods, and how consent is managed are described in detail in the Cookie Policy, which supplements this Policy.

§12. LINKS TO THIRD-PARTY WEBSITES

The Controller's websites may contain links to external services. Once a User navigates to such a site, the privacy policies of its operators apply. The Controller recommends reviewing them before providing any personal data.

§13. DATA OF MINORS

The Controller's websites are not directed at persons under the age of 16, and the Controller does not knowingly collect their personal data. Data of a person under that

age obtained without the required consent will be deleted promptly upon becoming aware of it.

\$14. CHANGES TO THIS PRIVACY POLICY

The Controller reserves the right to amend this Policy, in particular in connection with changes in law, in the scope of services provided, or in the tools used. The Controller will give at least 14 days' advance notice of material changes by means of a notice on the website. The current version of the Policy, together with its effective date, is always available at legal.legit.am.

\$15. CONTACT

Controller: Legitam P.S.A., ul. Weselna 5, 46-300 Świercze, Poland

Data Protection Officer: dpo@legit.am

E-mail (privacy): privacy@legit.am

General contact: contact@legit.am

Supervisory authority: President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw, Poland

Effective date: 28 August 2026

This Privacy Policy (Websites) is effective as of 28 August 2026 | Compliant with the GDPR (Regulation (EU) 2016/679) | Legitam P.S.A.