

## Privacy Policy

**We respect your right to privacy. This Privacy Policy sets out details of the data that we may collect from you, how we may use them and how may you use your rights as a data subject.**

- (A) **TRIBAL FINANCIAL SERVICES LTD**, a limited liability company having its registered seat at 71-75 Shelton Street, London, England, WC2H 9JQ, UK, Company no.: 12176883, <https://be-money.com> (hereinafter the „Tribal“) processes your data with due care, in accordance with all applicable laws and regulations, in particular with the regulation (EU) 2016/679 of the European Parliament and of the Council, the General Data Protection Regulation (hereinafter the “**GDPR**”) and the Act No. 18/2018 Coll. on the protection of personal data and on the alteration and amendment of some acts as amended.
- (B) This Privacy Policy was last modified on 11 March 2020 and may be occasionally updated to reflect changes in legislation, so please review it from time to time. You can always find the most recent version on our website <https://be-money.com>. If we make substantial changes, we will take steps to notify you. This Privacy Policy applies to all personal data that Tribal processes during the provision of its services and recruitment process, including the personal data of visitors of the company’s website and social media.
- (C) This Privacy Policy only covers data processing carried out by Tribal. The Privacy Policy does not address, and we are not responsible for, the privacy practices of any other parties.

### GENERAL INFORMATION

#### 1 Personal data processed and sources of data

- 1.1 Tribal uses two types of information about you: (i) personal data and (ii) technical data.
- 1.2 We collect your personal data in variety of ways including, but not limited to, during our recruitment process or subscription to a newsletter on the company’s website or via the contact form. We may collect and process the following personal data about you: your e-mail address.
- 1.3 We and/or our authorised external service providers (e.g., Google Analytics, Facebook and Mailchimp) may automatically collect technical data when you visit or interact with our services or website. Technical data may include, in particular, the browser name, the type of computer or device, time spent on website, interaction with the services, URL of the website you visited before and after visiting the services, the time and date of user visits, surfing habits, IP address, operating system and other similar technical information. In limited number of cases it is possible to use technical data and identify you by them as an individual, thus make them personal data according to applicable legal regulations, however, we never use technical data to identify you as an individual.

#### 2 Cookies

- 2.1 We also use cookies which are small files locally stored on your computer when you visit our website.
- 2.2 We use third-party cookies, specifically cookies of Mailchimp, Google and Facebook Pixel.
- 2.3 We use *functional* cookies, that allow us, and our partners, to collect standard internet log information and details of your behavioral patterns upon visiting our websites. This is done to provide you with a better experience and to facilitate the use of certain functions.
- 2.4 We also use *analytical* cookies which allow to, for instance, recognise and count the number of users and to see how users move around when they’re using our websites. These anonymous data help us to improve the way our websites work.

- 2.5 The cookies will not be used for any purposes other than the ones stated above. When you visit our websites you may choose to accept or refuse cookies by selecting the appropriate settings for your browser. You can also set your browser to warn you whenever you receive a new cookie. Feel free to contact us if you want to know more at [privacy@be-money.com](mailto:privacy@be-money.com).

## **PERSONAL DATA PROTECTION**

### **3 Identity and contact details of the controller**

- 3.1 The controller of your personal data is our company, i.e. Tribal.
- 3.2 To learn more about personal data management or if you have any other questions, you're welcome to contact us at the e-mail address [privacy@be-money.com](mailto:privacy@be-money.com)

### **4 Purpose and legal basis for processing**

- 4.1 We process your personal data for several purposes:

a) **TO SEND NEWS AND MARKET OUR FUTURE EVENTS AND ACTIVITIES**

This purpose includes mainly the following processing activities:

- sending you information about our company, services and activities (through email);
- delivering targeted invitations and promotional offers relating to our activities (through email).

We process the following personal data for this purpose: your e-mail address.

We process the above personal data on the following legal basis: your consent in accordance with Article 6 (1) (a) of GDPR (granted when subscribing to our newsletter or applying for jobs on our website). You always have the right to withdraw this consent by sending an email to: [privacy@be-money.com](mailto:privacy@be-money.com).

b) **TO EVALUATE, DEVELOP AND IMPROVE OUR SERVICES AND ACTIVITIES**

This purpose includes mainly the following processing activities:

- analysing collected data;
- creating anonymous statistics;
- analysing any trends in the use of our website and services,

all performed, in particular, in order to understand what activities our web visitors and applicants are interested in, how we can improve our website, activities and events or what kind of marketing we should use.

We process your e-mail address together with the technical data described under clause 1.3 for this purpose.

We process the above personal data on the following legal basis: legitimate interest (in evaluating, developing and improving our services, products and systems) in accordance with Article 6 (1) (f) of GDPR.

### **5 Recipients**

- 5.1 We only share your personal data within the organisation of Tribal and the group of companies into which Tribal belongs.
- 5.2 We do not share your personal data with any recipients outside of Tribal and the group of companies into which Tribal belongs unless one of the following circumstances applies:

a) IT IS NECESSARY FOR THE COMPLIANCE WITH OUR LEGAL AND CONTRACTUAL OBLIGATIONS TOWARDS YOU

To the extent that our external service providers (sub-processors) need access to your personal data to help us perform our services for you, Tribal has taken the appropriate contractual and organisational measures to ensure that your personal data are processed in accordance with all applicable laws and regulations.

Below is a non-exclusive list of our sub-processors:

- Mailchimp (Rocket Science Group)
- Google Analytics (Google LLC)
- Facebook Pixel (Facebook Ireland Limited)

The list of external service providers we use may change from time to time as we change or remove some of the providers listed above and/or put in place other providers to assist us in providing the services.

b) FOR LEGAL REASONS

We may share your personal data with recipients outside Tribal if we have a good-faith belief that access to and use of your personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, security or technical issues; and/or (iii) protect the interests, properties or safety of Tribal, our users or the public as far as in accordance with the law. When possible, we will inform you about such processing.

## 6 Transfer to countries outside EU/EEA

6.1 Tribal may transfer your personal data to countries outside the European Union and the European Economic Area where we engage with external service providers. In such case, we transfer your personal data only to a country that are considered to have an adequate level of protection in accordance with the EU Commission's decision or there are appropriate safeguards in place to protect your personal data, such as standard contract clauses, binding internal company rules or US Privacy Shield. Regardless of the country in which your personal data is processed, Tribal takes reasonable technical, legal and organisational measures to ensure that the level of protection is the same as in the European Union and the European Economic Area. If you wish to know more about international transfers of your personal data and the appropriate safeguards that we have in place to govern the transfer of your personal data, you may contact us via [privacy@be-money.com](mailto:privacy@be-money.com).

## 7 Storage period

7.1 Tribal stores your personal data only if it is legally permitted and necessary for the purposes for which the data were collected, however, no longer than 3 years.

## 8 Your rights

### 8.1 Right of access

Tribal offers you access to your personal data we process. This means you can contact us and request from us a confirmation whether or not your personal data are being processed and if so, you have the right to request access to your data, which we will provide to you in the form of a so-called "registry" (stating, in particular, purposes, categories of personal data, categories of recipients of personal data, storage periods or criteria for determining storage periods).

### 8.2 Right to rectification

You have the right to have inaccurate personal data we have stored about you rectified.

### **8.3 Right to erasure**

You may also ask us to erase your personal data from our systems. We will comply with such request unless we have a legitimate ground to not delete your personal data.

### **8.4 Right to object**

You have the right to object to processing that is based on a legitimate interest of ours if you have personal reasons that relate to the situation. We may however continue to process your information, despite your objection to the processing, if we have compelling legitimate reasons for the processing that outweigh your privacy interest. Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

### **8.5 Right to restriction of processing**

You may request us to restrict certain processing of your personal data. If you restrict certain processing of your personal data, this may lead to fewer possibilities to use our services and website.

### **8.6 Right to data portability**

You have the right to receive your personal data from us in a structured, commonly used and machine-readable format in order to transmit the personal data to another controller.

### **8.7 How to use your rights**

You may exercise your rights above, free of charge, in writing by sending a letter to our company's address or e-mail (to [privacy@be-money.com](mailto:privacy@be-money.com)). We may require confirmation of your identity depending on your request.

## **9 Complaint**

- 9.1 In case you consider our processing activities of your personal data to be inconsistent with the applicable data protection laws, you may lodge a complaint with the local supervisory authority for data protection.

## **10 Information security**

- 10.1 We take all reasonable, appropriate security measures to protect Tribal and our visitors from unauthorised access to or unauthorised alteration, disclosure or destruction of personal data we hold. Measures include, where appropriate, encryption, firewalls, secure facilities and access rights systems. Should despite of the security measures, a security breach occur that is likely to have negative effects to your privacy, we will inform you about the breach as soon as reasonably possible. If you have any questions, feel free to contact us at [privacy@be-money.com](mailto:privacy@be-money.com)