PRIVACY POLICY

TEDEE APIs and SKDs

I. GENERAL INFORMATION

- 1. The controller of your ("User") personal information is Tedee Sp. z o. o., based in Warszawa, 21/57 Karola Bohdanowicza Street, 02-127 Warszawa, Poland ("Tedee" or "Controller").
- 2. Tedee has not appointed a Data Protection Officer. For matters related to data protection, please contact us at e-mail: rodo@tedee.com or in writing to the Company's registered office address indicated above.

II. SCOPE OF DATA

- 1. The controller shall process only the following types of User's data:
 - a) First name and last name
 - b) Email address
 - c) Company or organization (if applicable)
 - d) Technical metadata related to integration activities (e.g., IP address, API call logs) (jointly: "Data").

III. PURPOSES AND BASES OF PERSONAL DATA PROCESSING BY THE CONTROLLER

- 1. Data will be processed in order to secure:
 - a) Registration and management of Developer accounts (on the basis of Article 6(1)(b) of the GDPR);
 - b) Communication regarding integration support and updates (on the basis of Article 6(1)(f) of the GDPR);
 - c) Compliance with legal obligations (e.g., cybersecurity) (on the basis of Article 6(1)(f) of the GDPR);

- d) Monitoring misuse or breaches of the Terms of Use (on the basis of Article 6(1)(f) of the GDPR);
- e) Asserting or securing claims (on the basis of Article 6(1)(f) of the GDPR).
- 2. Developer interactions with the APIs and SDKs, including any associated personal data (such as identifiers, access tokens, or usage metadata), may be automatically recorded in system logs. These logs are processed in connection with the provision, monitoring, and maintenance of the Developer Services.

In particular, log data may be temporarily stored and processed for technical and security-related purposes, including but not limited to:

- ensuring the stability, performance, and integrity of the APIs and SDKs,
- diagnosing issues and testing new or modified functionalities,
- creating and managing security backups,
- detecting integration errors or operational anomalies, and
- protecting against unauthorized access, misuse, or malicious activity.

Such processing is carried out on the basis of Tedee's legitimate interest (pursuant to Article 6(1)(f) of the GDPR) in maintaining the secure and effective operation of its Developer Services.

IV. DATA RETENTION

Personal data collected in connection with Developer Services will be stored for the duration of:

- Your active use of the Developer Services
- Plus a period of up to 3 years for archiving, compliance, and dispute resolution purposes

If you deactivate your Developer access or request deletion, we will retain only the minimum necessary information for legal defense or auditing.

V. RECIPIENTS OF DATA

1. In connection with the provision of services, Data will be disclosed to external entities, including in particular providers responsible for the operation of IT systems, entities

- such as banks and payment operators, entities providing accounting, legal, audit, consulting, courier services.
- 2. In case of obtaining the User's consent, his/her data may also be made available to other entities for their own purposes, including marketing purposes.
- 3. Data can be transferred to a third country/international organization.
- 4. The Application does not collect any information automatically except for the information specified in Section II above.

VI. USER'S RIGHTS

- 1. The User has the right to access his personal data, obtain a copy of them, the right to rectify, erase, restrict processing, the right to data portability, the right to object to the processing of the data on the basis of the Controller's legitimate interest or to the processing for direct marketing purposes, the right to withdraw consent at any time without affecting the legality of processing (if the processing is carried out on the basis of consent), which was performed on the basis of consent before its withdrawal.
- 2. The right to rectify Data is exercised in relation to a User who has an account in the Application also by allowing him/her to edit the data directly in the "User Profile" section.
- 3. In case the processing of personal data is considered to violate the provisions of the GDPR or other data protection regulations, the data subject may file a complaint with the Polish President of the Office for Personal Data Protection.
- 4. A request concerning the exercise of data subjects' rights may be submitted in writing or by e-mail to the contact details of the Data Controller indicated below.
- 5. The request should, if possible, precisely indicate what it concerns. In particular, what right the requesting person wishes to exercise and the subject of the request.
- 6. If the Controller is not able to determine the content of the request or identify the person submitting the request on the basis of the notification made, it will ask the applicant for additional information.

- 7. Requests will be responded to within one month of receipt. If it is necessary to extend this deadline, the Controller will inform the applicant of the reasons for such extension.
- 8. The response will be provided to the e-mail address from which the application was sent, and in case of applications sent by letter, by ordinary mail to the address indicated by the applicant, unless the content of the letter indicates the desire to receive feedback to the e-mail address (if such e-mail address was provided).

VII. ENTRY INTO FORCE

The Regulations enter into force on June, 24, 2025.