

Changes to the Allegro Finance sp. z o.o. Privacy protection policy from February 16, 2026

## Allegro Finance sp. z o.o. Privacy protection policy

### Appendix of Allegro Finance Terms & Conditions

### Section 1. Definitions, Purposes, and Scope of Application of the Policy

#### DEFINITIONS

1. **Personal Data** — within the meaning of the definition contained in Article 4(1) of the GDPR, personal data are understood as information about a natural person identified or identifiable by one or more specific factors determining, e.g., physical, physiological, genetic, mental, economic, cultural, or social identity, including first and last name, contact number, email address, [information provided through User requests or instructions](#).

(...)

### Section 2. Source of Personal Data Processed by the Company

We can obtain your data from various sources:

A. Directly from you, using third-party identity verification or identification services, [and in connection with information provided by you through inquiries or instructions](#);

(...)

### Section 3. Scope of Personal Data Processed by the Company

(...)

A unique identification and decision making about the possibility of establishing a relationship with you or a party associated with you, as well as the need to prevent financial crimes may require the processing of Personal Data not specified in the Policy. As a rule, the Company processes data in the following scope:

A. Users who are natural persons (including those using payment instruments issued by the Company):

(...)

- Other Personal Data disclosed in particular by the User and public authorities in the course of using the Company's services (e.g., during the complaint or enforcement \*procedure);
- information provided by you through inquiries or instructions placed in automated tools to support the Company's operations.

(...)

## H. Creditors:

- Identification data, e.g., first name(s), last name(s), unique identification numbers (e.g. PESEL (Personal ID No.), NIP (Tax Identification Number), REGON (National Business Registry Number));
- Contact details, e.g., mailing address, contact number, email address;
- Other Personal Data disclosed, in particular, by the creditor, public authorities (e.g., during enforcement, security, complaint proceedings related to the assignment agreement).

In the case of direct contact with the User service team/helpline of the Company, its recording may also be processed, about which you will be informed.

The application of financial security measures may involve the processing of data relating to the holding of, or association with, political positions, which is related to the determination under the AML and terrorist financing law. whether:

- you hold a politically exposed position,
- you are a family member of a politically exposed person or a person known to be a close associate of a politically exposed person.

## H. Creditors:

- ~~Identification data, e.g., first name(s), last name(s), unique identification numbers (e.g., PESEL (Personal ID No.), NIP (Tax Identification Number), REGON (National Business Registry Number));~~
- ~~Contact details, e.g., mailing address, contact number, email address;~~
- ~~Other Personal Data disclosed in particular by a creditor or public authorities (e.g., in the course of enforcement, security, complaints proceedings, or proceedings related to the assignment agreement).~~

## Section 4. The purpose and legal grounds for the processing of your personal data by the Company

Depending on the services or functionalities you use, there are different purposes and legal grounds for processing Personal Data by the Company and periods during which the Company may store or use your Personal Data.

For each of the purposes of processing, we have specified the legal basis and the maximum period for the storage of Personal Data. After the indicated period, we will not use your Personal Data for the indicated purpose. However, this does not mean that we will delete them in every case. We will retain your Personal Data for the longest period indicated for specific services of the Company. For example, if you opt out of the Company's services, we will stop processing your Personal Data for the purpose of providing the Company's services. We will store them for the period provided by law, for example to enable the exercise of your rights, and to be able to comply with legal obligations provided for in accounting, tax and anti-money laundering regulations.

**If artificial intelligence (AI) systems or models are used, the Company processes Personal Data on the basis of a legitimate interest, unless the specific use requires other legal grounds, which we will specifically indicate in such cases.**

Below we have described standard actions on Personal Data in connection with the use of services or functionalities provided by the Company. More detailed information on the processing of Personal Data when using certain services may also be found in the Terms & Conditions of those services.

### **CONCLUDING AN AGREEMENT WITH THE COMPANY AND ITS PERFORMANCE**

(...)

In connection with the performance of services, we process your Personal Data according to the rules described in the table. In addition, your Personal Data may be processed for other purposes, including analytical and marketing purposes, and to guarantee the security of our services, as you will learn from further sections of this part of the Policy. **For the purposes described in this part, we may use artificial intelligence (AI) systems or models.**

(...)

### **USER SERVICE AND CONTACT FORM**

(...)

In relation to the handling of content addressed to the Company, including through the contact form, we process your Personal Data according to the rules described in the table. Your Personal Data may also be processed for other purposes, including analytical and marketing purposes, and to guarantee the security of our services. Continue reading to learn more. **For the purposes described in this part, we may use artificial intelligence (AI) systems or models.**



(...)

## MARKETING ACTIVITIES

The Company may also use your Personal Data to carry out marketing activities, including where you provide your Personal Data or give your consent to their processing. In return, the Company makes content or services available to you. **For the purposes described in this part, we may use artificial intelligence (AI) systems or models.**

(...)

## ANALYTICAL AND STATISTICAL ACTIVITIES AND SURVEYS

(...)

In connection with the performance of analytical and statistical activities, we process your Personal Data according to the rules described in the table. Your Personal Data may also be processed for other purposes, including in particular to guarantee the security of our services, as you will learn from further sections of this part of the Policy. **For the purposes described in this part, we may use artificial intelligence (AI) systems or models.**

(...)

## ENSURING SECURITY OF THE SERVICES PROVIDED AND ENFORCING THE TERMS & CONDITIONS

(...)

In order to guarantee an adequate security level and prevent abuse and fraud, the Company may obtain and record Personal Data transmitted to the server by web browsers or your devices (which include, in particular: technical components of the device, **how it is used**, your browser settings, and details of your viewing behavior on Allegro) in such a way as to create a unique digital “fingerprint” of the devices or instances of applications that you use.

**In order to counteract abuse, fraud, activities that violate rules of morality, the Allegro Terms & Conditions, and attempts to use your Account without authorization, the Company provides Lexisnexis Risk Solutions (EUROPE) Limited with Personal Data and certain Personal Data from your online interactions. These data allow querying the anonymous digital identity network (DIN) consisting of events originating from the entities participating in the network. Personal data outside the IP address is provided by us in a masked form in such a way that it is not possible to identify you. Information about the processing of data by Lexisnexis Risk Solutions (EUROPE) Limited can be found [here](#).**

In order to prevent abuse, fraud, and acts that violate the terms of our services, applicable laws (including national or international restrictive measures), or that negatively affects security, we automatically process Personal Data relating to the use of our services and products, including analyzing links with other parties whose personal data we process. In order to counteract the occurrences listed above, we will make decisions in your case based on automatic data processing, including profiling. **For the purposes described in this part, we may use artificial intelligence (AI) systems or models.**

(...)

## Section 6. Personal Data Recipients

The recipients of your Personal Data may be:

(...)

D. Other parties, if this results from the [rules or](#) terms of services provided by us and this Policy.

We cooperate with specialized providers of data storage services, analytical services, debt collection services, and IT services. In this case, your Personal Data will be processed exclusively on behalf of and for the purposes of Allegro Finance in accordance with the concluded data processing agreements. [The company also cooperates with entities offering tools based on artificial intelligence \(AI\) systems or models.](#)

## Section 7. Transfers of Personal Data to Countries Outside the European Economic Area

(...)

At the same time, as part of cooperation with processors, data processing may be further entrusted to parties that may transfer data to countries outside the European Economic Area. Parties that systematically process data for Allegro Finance include:

- Genesys Cloud Services BV with its registered office in Amsterdam, the Netherlands, in connection with the use of Personal Data processing services offered by this party to ensure the provision of services offered by the Company as part of Allegro Finance;
- Google Cloud Poland sp. z o. o. with its registered office in Warsaw, Poland, in connection with the use of Personal Data processing services offered by this party and provided outside the European Economic Area to ensure the provision of payment services by Allegro Finance;
- [Lexisnexis Risk Solutions \(EUROPE\) Limited, based in Dublin, Ireland, in connection with the use of the ThreatMetrix service to ensure the security of the provision of services by the Company offered on Allegro;](#)
- Microsoft Ireland Operations, Ltd with its registered office in Dublin, Ireland, in connection with the use of Personal Data processing services offered by this party to ensure the provision of services offered by the Company as part of Allegro Finance;
- SFDC Ireland, Ltd (SalesForce) with its registered office in Dublin, Ireland, in connection with the use of Data processing services offered by this party to ensure the provision of services by Allegro Finance;



- Snowflake Computing Netherlands, B.V. with its registered office in Amsterdam, the Netherlands, in connection with the use of Personal Data processing services offered by this party to ensure the provision of services offered by the Company as part of Allegro Finance.

(...)