

WEBSITE PRIVACY POLICY

H2PL.IO

GENERAL TERMS

This privacy policy of the website available at www.mokocapital.com (hereinafter: "Website" or "Internet Site") is informative, which means that it does not impose any obligations on persons using the Website. The Privacy Policy primarily contains rules regarding the processing of personal data collected by the Administrator at the Website, including the grounds, purposes and duration of the processing of personal data and the rights of data subjects, as well as information on the use of cookies and similar technologies and analytical tools at the Website.

The Administrator of the personal data collected through the Website is H2PL LIMITED LIABILITY COMPANY with its registered office in Warsaw (registered office and address for delivery: ul. Zawrat 15, 02-702 Warsaw); entered in the Register of Entrepreneurs of the National Court Register under KRS number 0000630548; the register court where the company's documentation is kept: District Court for the Capital City of Warsaw in Warsaw, XIII Commercial Division of the National Court Register; NIP: 5213743816; REGON: 365076693, e-mail address: biuro@h2pl.io - hereinafter referred to as "**Administrator**" and being at the same time the Owner of the Website.

Personal data on the Website are processed by the Administrator in accordance with the applicable legal provisions, in particular in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in relation to the processing of personal data and on the free movement of such data and repealing Directive 95/46/WE (General Data Protection Regulation on Data Protection) - hereinafter referred to as the "**RODO**" or the "**RODO Regulation**". Official text of the RODO Regulation: <http://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32016R0679>.

The use of the Website is voluntary. Similarly, the provision of personal data by the user using the Website is voluntary, with the reservation that if the user fails to provide certain data required for the use of a certain Website functionality, this may result in the impossibility to use this functionality (e.g. contact form). In such a case, provision of personal data is a contractual requirement, and if the data subject wishes to use a specific functionality made available on the Site by the Administrator, he/she is obliged to provide the required data. Each time, the scope of data required to use a Website feature is indicated by the Administrator on the Website (e.g. before filling in the contact form).

The Administrator exercises special care to protect the interests of persons to whom the personal data it processes relate, and in particular is responsible for and ensures that the data it collects are: (1) processed lawfully; (2) collected for specified, legitimate purposes and not subjected to further processing incompatible with those purposes; (3) substantively correct and adequate in relation to the purposes for which they are processed; (4) kept in a form which permits identification of data subjects for no longer than is necessary to achieve the purpose of processing; and (5) processed in a manner which ensures adequate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, by means of appropriate technical or organizational measures.

Taking into account the nature, scope, context and purposes of the processing and the risk of violation of the rights or freedoms of natural persons of varying probability and gravity, the Administrator shall implement appropriate technical and organizational measures to ensure that the processing is carried out in accordance with the RODO Regulation and to be able to demonstrate this. These measures shall be reviewed and updated as necessary. The Administrator uses technical measures to prevent unauthorized persons from acquiring and modifying personal data transmitted electronically.

All words, phrases and acronyms appearing in this Privacy Policy and beginning with a capital letter shall be construed in accordance with their meanings as set forth herein.

BASIS OF DATA PROCESSING

The Administrator is authorized to process personal data where - and to the extent that - at least one of the following conditions is met: (1) the data subject has given his or her consent to the processing of his or her personal data for one or more specified purposes; (2) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (3) processing is necessary for compliance with a legal obligation to which the Administrator is subject; or (4) processing is necessary for the purposes of

legitimate interests pursued by the Administrator or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Processing of personal data by the Administrator requires each time the existence of at least one of the of the aforementioned conditions. Specific conditions for processing of personal data of the Website users by the Administrator are indicated in the next point of the privacy policy - in relation to the given purpose of processing of personal data by the Administrator.

PURPOSE, BASIS AND DURATION OF DATA PROCESSING ON THE WEBSITE

In each case, the purpose, basis and duration and recipients of the personal data processed by the Administrator result from the activities undertaken by the respective user on the Website.

The Administrator may process personal data on the Website for the following purposes, on the following grounds and for the period as set out in the table below:

Purpose of data processing	Legal basis for data processing	Data storage period
Usage of electronic services made available by the Administrator on the Website	Article 6(1)(b) of the RODO Regulation (fulfilment of a contract) - processing is necessary for the fulfilment of a contract to which the data subject is a party, or to take steps at the request of the data subject prior to entering into a contract, such as, for example, responding to an inquiry sent by a user via a contact form	The data are kept for the time necessary to execute, terminate or otherwise expire the contract concluded with the Administrator, e.g. for the time necessary to answer the user's inquiry sent via the contact form.
Direct marketing	Article 6(1)(f) of the RODO Regulation (legitimate interest of the Administrator) - processing is necessary for the purposes deriving from the Administrator's legitimate interests - consisting in ensuring the Administrator's interests and good reputation	The data shall be stored for the period of existence of a legitimate interest pursued by the Administrator, however, not longer than the period of limitation of claims against the data subject resulting from the Administrator's business activities. The period of limitation shall be determined by law, in particular the Civil Code (the basic limitation period for claims related to the running of a business activity is three years). The Administrator shall not process data for direct marketing purposes in the case of an effective objection to such processing by the data subject.
Determining, pursuing or defending claims that Administrator may assert or that may be asserted against Administrator	Article 6(1)(f) of the RODO Regulation - processing is necessary for purposes deriving from the Administrator's legitimate interests - consisting of determining, asserting or defending claims which may be raised by the Administrator or which may be raised against the Administrator	The data shall be stored for the period of time during which there is a legitimate interest pursued by the Administrator, however, not longer than the period within which the data subject's claims against the Administrator in respect of its business activities are time-barred. The period of limitation shall be determined by law, in particular the Civil Code (the basic limitation period for claims that may be raised against the Administrator is six years).

Use of the Website and ensuring its proper operation	Article 6(1)(f) of the RODO Regulation (legitimate interest of the Administrator) - processing is necessary for purposes stemming from the Administrator's legitimate interests - consisting in running and maintaining the Website	The data shall be stored for the period of existence of a legitimate interest pursued by the Administrator, however, not longer than the period of limitation of the Administrator's claims against the data subject on account of the Administrator's business activities. The period of limitation shall be determined by law, in particular the Civil Code (the basic limitation period for claims related to business activities is three years).
Keeping statistics and analysing traffic on the Website	Article 6(1)(f) of the RODO Regulation (legitimate interest of the Administrator) - processing is necessary for purposes stemming from the Administrator's legitimate interests - consisting in statistics and Website traffic analysis in order to improve the functioning of the Website	The data are stored for the period of existence of a legitimate interest pursued by the Administrator, however, not longer than the period within which the Administrator's claims against the data subject arising out of the Administrator's business activities are time-barred. The period of limitation shall be determined by law, in particular the Civil Code (the basic limitation period for claims related to business activities is three years).

DATA RECIPIENTS ON THE WEBSITE

For the proper functioning of the Website, it is necessary for the Administrator to use the services of external entities (such as a software provider). The Administrator only uses the services of such processors who provide sufficient guarantees to implement appropriate technical and organizational measures so that the processing meets the requirements of the RODO Regulation and protects the rights of the data subjects.

Transfer of data by the Administrator does not take place in every case and not to all recipients or categories of recipients indicated in the privacy policy - the Administrator transfers data only if it is necessary for the realization of a given purpose of personal data processing and only to the extent necessary for its realization.

Personal data may be transferred by the Administrator to a third country, whereby the Administrator ensures that, in such case, this will be done in relation to a country providing an adequate level of protection - in accordance with the RODO Regulation, and the data subject is able to obtain a copy of their data. The Controller may transfer currently collected personal data only to the United Kingdom and only if and to the extent necessary to fulfill the given purpose of the processing in accordance with this Privacy Policy.

Personal information of Website users may be transferred to the following recipients or categories of recipients:

- **service providers providing the Administrator with technical, IT and organizational solutions enabling the Administrator to run its business, including its Website and electronic services** (in particular software providers for running the Website, e-mail and hosting providers and providers of business management and technical support software for the Administrator) - the Administrator shall make the collected user's personal data available to the chosen provider acting on its behalf only in the case and to the extent necessary to carry out the given purpose of data processing in accordance with this Privacy Policy.
- **providers of legal and advisory services providing the Administrator with legal or advisory support (in particular a law firm)** - The Administrator shares your personal data with a selected provider acting on its behalf only if and to the extent necessary to carry out the given purpose of data processing in accordance with this Privacy Policy.
- **providers of social plug-ins, scripts and other similar tools placed on the Site that enable the browser of the Site visitor to retrieve content from the providers of said plug-ins** (e.g. the "Like" or "Share" button) and to transmit the visitor's personal data to these providers for this purpose.

PROFILING

The RODO Regulation requires the Controller to provide information on automated decision-making, including profiling as referred to in Article 22(1) and (4) of the RODO Regulation, and, at least in those cases, relevant information on the modalities of such decision-making, as well as on the significance and the envisaged consequences of such processing for the data subject. With this in mind, the Administrator provides information on possible profiling in this section of the privacy policy.

The Administrator may use profiling on the Site for direct marketing purposes, but decisions made on its basis by the Administrator do not relate to the conclusion or refusal of a contract or the ability to use the Site. The use of profiling may result, for example, in the Site displaying advertisements that may be relevant to a person's interests or preferences. Despite the profiling, it is up to you to decide whether you want to visit the Site again.

Profiling on the Site involves automatically analyzing or predicting a person's behavior on the Site, or by analyzing a person's past history of activities on the Site. Such profiling is subject to the Administrator having personal data on the person in question in order to be able to display advertisements to that person, e.g. in the Google or Facebook advertising network.

The data subject has the right not to be subject to a decision which is based solely on automated processing, including profiling, and which produces legal effects concerning the data subject or significantly affects the data subject in a similar manner.

RIGHTS OF THE DATA SUBJECT

Right of access, rectification, restriction, erasure or portability - the data subject has the right to request from the Administrator access to his/her personal data, their rectification, erasure ("right to be forgotten") or restriction of processing and has the right to object to the processing and has the right to data portability. Detailed conditions for exercising the rights indicated above are indicated in Articles 15-21 of the RODO Regulation.

Right to withdraw consent at any time - a person whose data are processed by the Administrator on the basis of expressed consent (pursuant to Article 6(1)(a) or Article 9(2)(a) of the RODO Regulation) has the right to withdraw consent at any time without affecting the legality of the processing that was performed on the basis of consent before its withdrawal.

Right to lodge a complaint to the supervisory authority - the person whose data is processed by the Administrator has the right to lodge a complaint to the supervisory authority in the manner and mode specified in the provisions of the RODO Regulation and Polish law, in particular the Personal Data Protection Act. The supervisory authority in Poland is the President of the Office for Personal Data Protection.

Right to Objection - The data subject has the right to object at any time - on reasons related to his or her particular situation - against the processing of personal data concerning him or her based on Article 6(1)(e) (public interest or tasks) or (f) (legitimate interest of the controller), including profiling on the basis of these provisions. In that case, the controller shall no longer be permitted to process such personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or grounds for the establishment, exercise or defence of claims.

Right to object to direct marketing - where personal data are processed for the purposes of direct marketing, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, including profiling, to the extent that the processing is related to such direct marketing.

In order to execute the rights referred to in this section of the privacy policy, you may contact the Administrator by sending a relevant message in writing or by e-mail to the Administrator's address indicated at the beginning of the privacy policy.

WEBSITE COOKIES AND ANALYTICS

Cookies are small information in the form of text files sent by a server and stored on the Website visitor's side (e.g. on the hard drive of a computer, laptop or smartphone memory card - depending on the device used by the visitor to our Website). Detailed information on Cookies as well as the history of their creation can be found, inter alia, here: https://en.wikipedia.org/wiki/HTTP_cookie.

Cookies that may be sent by the Website can be divided into different types, according to the following criteria:

<p>Due to their supplier:</p> <ol style="list-style-type: none"> 1) own (created by the Administrator's Website) and 2) owned by third parties (other than the Administrator) 	<p>Due to their storage period on the device of the person visiting the Website:</p> <ol style="list-style-type: none"> 1) session (stored until you leave the Website or turn off your web browser) and 2) permanent (stored for a specific time defined by the parameters of each file or until manual removal) 	<p>Due to the purpose of their use:</p> <ol style="list-style-type: none"> 1) necessary (enabling proper functioning of the Website), 2) functional/preferential (enabling adjustment of the Website to the visitor's preferences), 3) analytical and performance (gathering information about the manner of use of the Website), 4) Marketing, advertising and social (gathering information about the person visiting the Website for the purpose of displaying personalized advertising and conducting other marketing activities, including on Websites separate from the Website, such as social networking sites)
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The Administrator may process the data contained in cookies when visitors use the Website for the following specific purposes:

<p>Purposes of using cookies on the Administrator's Website</p>	storing data from completed forms and surveys (essential and/or functional/preferential cookies)
	adapting the content of the Website to individual user preferences (e.g. regarding colors, font size, page layout) and optimising the use of the Website (functional/preference cookies)
	keep anonymous statistics showing how the Website is used (analytical and performance cookies)
	remarketing, i.e. studying the behavioural characteristics of visitors to the Website by analysing their actions anonymously (e.g. repeated visits to specific pages, keywords, etc.) in order to create a profile of them and provide them with advertisements tailored to their predicted interests, also when they visit other Websites belonging to the advertising network of Google Ireland Ltd. (Marketing, advertising and social networking cookies)

Checking in the most popular web browsers which cookies (including the duration of the cookies and their provider) are being sent at a given moment by the Website is possible in the following way:

<p>In Chrome browser:</p> <p>(1) in the address bar click on the lock icon on the left, (2) go to the "Cookies" tab.</p>	<p>In Firefox browser:</p> <p>(1) in the address bar, click on the shield icon on the left, (2) go to the "Allowed" or "Blocked" tab, (3) click on the "Site-to-Site Tracking Cookies", "Social Media Tracking Elements" or "Content with Tracking Elements" box</p>	<p>In Internet Explorer browser:</p> <p>(1) click the "Tools" menu, (2) go to the "Internet Options" tab, (3) go to the "General" tab, (4) go to the "Settings" tab, (5) click the "View Files" box</p>
<p>In Opera browser:</p> <p>(1) in the address bar click on the</p>	<p>In Safari browser:</p> <p>(1) click the "Preferences" menu, (2)</p>	<p>Regardless of your browser, you can use the tools available at:</p> <p>https://www.cookie-matrix.com/</p>

lock icon on the left, (2) go to the "Cookies" tab.	go to the "Privacy" tab, (3) click the "Manage Website data" box	or: https://www.cookie-checker.com/
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By default, most web browsers available on the market accept the storage of cookies. You can determine the conditions for the use of cookies through the settings of your web browser. This means that you can, for example, partially restrict (e.g. temporarily) or completely disable the storage of cookies - in the latter case, however, this may affect certain functionalities of the Website.

The cookie settings of your Internet browser are relevant to your consent to the use of Cookies are important for your consent to the use of cookies by our Website - according to the regulations, such consent can also be given through your browser settings. Detailed information on how to change the settings for cookies and how to delete them yourself in the most popular web browsers is available in the help section of your web browser and on the following pages (by clicking on the link):

[in Chrome browser](#)

[in Firefox browser](#)

[in Internet Explorer browser](#)

[in Opera browser](#)

[in Safari browser](#)

[in Microsoft Edge browser](#)

The Administrator may use Google Analytics and Universal Analytics services on the Website provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). These services help the Administrator keep statistics and analyse traffic on the Website. The data collected is processed by the above services to generate statistics which help administer the Website and analyse the Website traffic. The data are of an aggregate nature. When using these services on the Website, the Administrator collects such data as the source and medium of obtaining visitors to the Website and their behaviour on the Website, information about the devices and browsers from which they visit the Website, IP and domain, geographical data and demographic data (age, gender) and interests.

You can easily prevent Google Analytics from collecting information about your activities on the Website, for example by installing the browser add-on provided by Google Ireland Ltd. available here: <https://tools.google.com/dlpage/gaoptout?hl=en>.

The Administrator may use on the Website the Facebook Pixel service provided by Facebook Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland). This service helps the Administrator to measure the effectiveness of advertisements and to find out what actions visitors take on the Website, and to display tailored advertisements to those visitors. You can find detailed information about how Facebook Pixel works at the following web address: https://www.facebook.com/business/help/742478679120153?helpref=page_content.

You can manage the operation of Facebook Pixel by setting up ads in your Facebook.com account: https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen.

FINAL STATEMENTS

The Website may contain links to other Websites. The Administrator encourages the visitors to familiarize themselves with the privacy policy established there after having visited other Websites. This privacy policy concerns only this Administrator's Website and personal data processed in connection with its use.