

ROLAN TRADE SP. Z O.O.

Privacy Policy.

1. General provisions

ROLAN TRADE SP. Z O.O. International Business Company Number KRS: 0000758151 (hereinafter referred to as the “Company”) highly appreciates the relationships with the existing and potential clients (hereinafter referred to as “Clients”) and visitors of the Company resources, and understands the importance of security and privacy of their personal data.

Company operates in full compliance with the International Safe Harbour Privacy Principles and the existing legislation. We always pay a due attention to the privacy protection of your personal data. Visitors of the Company Internet resources can view most of the pages of our website, but the amount of the information that is being collected from the visitors does not exceed the volume of data that is normally collected at the work protocols of an average internet server. However, in order for us to provide you with the basic services, we may require some of your personal details. Any information received from you is used solely and exclusively for the purpose of improving the quality of our services and to make our services as well as the contents of the Company Internet resources simpler and more comfortable to use.

This Privacy Policy is maintained to explain to the visitors of the site the main reasons and the ways that the Company collects, stores, protects and uses the personal details of its clients.

By accepting the terms and conditions of the Customer Agreement and/ or using the services of the Company, The Client, thereby, gives its full consent to the collection, storage, protection and use of his (her) personal data in accordance with this Privacy Policy. In case of non-acceptance of this Privacy Policy the use of the services of the Company must be terminated.

2. The Internet resources that are under this Privacy Policy

This Privacy Policy applies to all the Internet resources of the Company (web sites, domains, as well as all subordinate objects that are owned or controlled, and / or managed by the Company) and does not apply to the web sites of other (non-affiliated)

companies connected with the Company via hypertext links.

The Company acts on the assumption that the user who resorts to the Company Internet resources:

- uses the Internet resources of the Company on his or her own behalf and reliably states the personal data when it is needed;
- defines and controls the settings of the software that is used;
- has the opportunity to get acquainted with this Privacy Policy by clicking on the hypertext link "Privacy Policy" from any page of the Company Internet resources.

3. Rights of Client concerning personal data

We guarantee to the Clients of the Company that we comply with the following rights:

- The right to get information in respect of whether the Company keeps the Clients' information allowing to identify the his/ her identity;
- The right to the removal of the personal data that is retained by the Company;
- The right to the specification or correction of his/ her personal data retained by the Company;
- The right to follow the methods of use of the personal data. Any promotional materials that we send to you (eg, mailshots or newsletters), would contain technological capacities that allow you to stop its subsequent distribution.
- The right to change the way that we use your personal data (for example, if you decide to subscribe to the particular newsletter, etc.).

Client has right to disclose his/ her own personal information in any legitimate way. We are not responsible for any actions of the third parties, who may obtained access to the Client's personal information as a result of the stated above distribution of the personal data, or obtained access to the Client's personal data illegally.

4. Collection, storage, protection and use of personal data of Client

Collection

The following refers to personal data of Clients:

- personal information stated by Client when completing the electronic forms as well as when writing messages to the Company, requests via the feedback form on the Company Internet resources, etc.

The information may include: name, date of birth, address, passport details, telephone, e-mail, trading experience etc;

- financial documents provided by Client in order to confirm the fact of transaction: certified payment order, bank statements, copies of credit cards, etc:

- standard data that the

http-server receives for the access to the Company online resources (IP-address of the host, address of the requested Internet resource, time, type, and information about the browser that sent the request for the resource, the type of the user's operating system, the page address, from which the transition to the requested resource was made);

- the information that is automatically received at the time of the access to the resources of the Source with the use of cookies.

Storage and protection

We take all the necessary measures to protect personal data from unauthorized access, alteration, disclosure or destroying. These measures include, in particular, internal monitoring of the collection, storage and processing the data and the security measures, including appropriate encryption and physical protection of data in order to prevent unauthorized access to the personal database. The company commits not to provide access to Clients' personal data to anyone except the employees, agents, partners and associates of the Company to the extent that is required to conduct business, including, banking and credit relationships. The Company guarantees the compliance with this Privacy Policy by the stated parties, including taking the necessary

measures concerning the storage and protection of the personal data of the Clients. The Company is eligible to disclose the personal data of the Clients to the federal or state regulating and law enforcement authorities under which jurisdiction of the Company is located, as a response to appropriate legal requests to provide such information, as well as to disclose such information where requested by the Court Order.

Use of personal data of Clients

The Company uses personal data of Clients in order to provide high quality of products and services rendered, perfect execution of its contractual obligations with clients and, ultimately, the success of the business in general. Personal data of Clients allows us to maintain the feedback, including the prompt distribution of the correspondence about the latest news, products and services, bonuses and promotional offers from the Company, as well as to offer our support on a wide range of issues.

Besides, we may use your personal data in order to identify you as a Client, to accelerate the procedures concerning the transfer and withdrawal of funds, and in order to execute our marketing research etc. Information about the Client's credit card is used solely for processing of payments and fraud prevention. We do not use this information for any other purposes; when the service is rendered all the relevant data is deleted.

The data that is not of a personal nature is obtained for the statistics related to the use of the Company Internet resources, their productivity and efficiency. We use the statistics to improve customer service, simplify work with our Internet resources and improve the quality of the materials.

Links to Internet resources of third parties

The Company Internet Resources may contain hypertext links to the Internet resources of other (non-affiliated) companies. When going to another Internet resource by any of these links, you are moving away from the Company Internet resource. Please be aware that we do not manage, of course, Internet resources of other companies, neither can we control their privacy protection policy and, obviously, their policy may be different from the one of the Company. The personal data that you give to other companies do not fall under the operation of this Privacy Policy. We recommend,

therefore, that you familiarize yourself with privacy policies of other companies before providing them with your personal information.

Statement regarding under age persons

The Company admits the necessity of assuming a liability for the protection of information received from under age persons. We insistently recommend parents to instruct their children in such a manner that when using the Internet, the children never disclose their real names, addresses or phone numbers without prior permission of adults. The Company commits not to use the information provided by children under the age of 12 years old. It is recommended for teenagers of 13-17 years old to familiarize themselves with our Privacy Policy under the permission of their parents and contact us if they want to learn more about our guarantee of personal data privacy. The persons under the age of 18 years old are not allowed to use any products and services of the Company rendered via Internet, without the permission of their parents or tutors. We are addressing to the parents and tutors for vigilance in order to prevent access to the web sites and services which are not appropriate for minors.

The routine of correspondence sent to the Company

All the correspondence sent to us by the Clients or visitors of the Company Internet resources, is treated by the Company as confidential and may only be published with the written consent of senders. The address, the phone number and other personal details of the sender cannot be used without his/ her consent for any purpose other than responding to the Client, and only regarding the matter, that the initial letter from the client was referring to.

Final Provisions

This Privacy Policy is an open document for general use. The current edition is available on our site and has a permanent address - https://santrapay.com/privacy_policy.html. The Company reserves the right to change

the Privacy Policy, notifying about any changes on the webpage situated at the above address. Date of the current edition would be indicated at the top of the page. Changes that are made in this Privacy Policy will be published on this page. In the case of significant changes to the Policy, we will notify you in more evident way (eg. by sending a newsletter via e-mail). Please send your comments on this Privacy Policy, to the e-mail addresses shown under the «Contacts» Section on the Company internet resources. Special Notice This website uses Google Analytics, a web analysis service of Google Inc. («Google»). Google Analytics uses so-called «Cookies», text files that are stored in your computer which allow them to make an analysis of your use of the website. The cookies created with information about your use of this website are usually transferred to a Google server in the U.S. and it is stored there. Google uses this information on the instructions of the owner of the web site to analyze your preferences, compiling reports on activities related to the website as well as update other services related of the website and Internet.

The IP - address transmitted by your browser within Google Analytics is not merged with other data of Google. You can prevent the saving of Cookies configuring software on your browser. However we should warn you that in this case you may not be able to use the full functionality of this website. In addition, you can prevent data registration at Google, created by Cookies and related to the use of the website (including your IP-address) as well as the processing of the data by Google, if you download and install an integrated browser module in the link below:

<https://tools.google.com/dlpage/gaoptout?hl=en>.