

## Privacy Notice

# Principles for processing personal data

Updated February 1<sup>st</sup> 2021

These Principles provide a general description of how PayEx processes Personal Data. They apply when PayEx is the data controller and when you use, have used or have expressed an intention to use, or in any other way associate with one of the services supplied by us, including such circumstances established before these Principles came into force.

Specific information on the processing may be found in agreements and in separate privacy notices applicable for specific products or services. Where such information exists, the specific notices will take precedence before these principles. Separate privacy notices may also be presented adjacent to temporary offers or campaigns.

If you are an employee or candidate to a job at PayEx, we will provide you with the relevant information on the processing of your personal data in your contact with us.

The companies within the PayEx group that may be acting as personal data controller are PayEx Sverige AB (556735-5671), PayEx Norge AS (979 315 503), PayEx Danmark A/S (70986914) and PayEx Suomi Oy (215 68 11-3). You can find contact information for all PayEx companies [here](#).

## 1. Definitions

**Contractual obligation:** legal ground describing the performance of a contract to which a data subject is party

**Customer:** a natural person who uses, has used or has expressed a desire to use, or in some other way can be related to one of the services supplied by PayEx.

**Personal Data:** all information that makes it possible, directly or indirectly, to identify a natural person.

**Processing:** all handling of Personal Data (incl. collection, registration, recording, storage, transfer, deletion, etc).

**PayEx:** May refer to PayEx Sverige AB (556735-5671), PayEx Norge AS (979 315 503), PayEx Danmark A/S (70986914) and PayEx Suomi Oy (215 68 11-3).

**Third party:** a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

## 2. Categories of Personal Data

Personal data can be collected directly from you, through the use of our services, or from external sources, such as public or private registers or third parties.

The categories of personal data that we collect and process are listed below.

### Examples of information that we collect directly from you

Identification Information	Name, personal ID number, date of birth, information on identity documentation (e.g. copy of passport, ID card)
Contact Information	Address, telephone number, e-mail address, communication language
Communication and Interaction Information	Sound recordings, e-mails, messages sent through other communication tools such as social media, information related to your visits to PayEx websites or through other PayEx channels
Payment Information	Bank account number, credit and debit card data (card number, expiration date, CVV, CVC)
Information on origin of assets and relationships to legal persons	Information on whether you are a person in a politically exposed position or if you are included in any external sanction lists

### Examples of information that we collect from other sources or third parties

Financial information <i>Collected through your use of our services or from sources such as credit agencies</i>	Transaction information, credits, income, debts, payment remarks, accounts, ownership
Information on origin of assets and relationships to legal persons <i>Collected from external information agencies and credit agencies</i>	Information on whether you are a person in a politically exposed position or if you are included in any external sanction lists
Information received and/or created when fulfilling a legal obligation <i>Collected from authorities (courts, credit agencies, public databases, the tax and enforcement authorities)</i>	Details of income, credit commitments, property holdings, records of non-payment and debts.
Information on your tax residency <i>Collected from authorities and/or public databases</i>	Country of residence, tax identification number
Device information <i>Collected from your use of our services and third party software</i>	IP addresses, browser settings, screen resolution, operating system

Information on goods and services <i>Collected through your use of our services</i>	Details about type of products and services purchased
Data related to services <i>Collected through your use of our services</i>	Completed transactions, concluded and cancelled agreements, submitted applications, enquiries and complaints
Information on preferences and customer satisfaction <i>Collected through your activity level, which services are being used, personal settings and questionnaire responses</i>	Preference information and survey responses

### 3. Our purposes and legal basis for processing personal data

The law states that a data controller must have a clear purpose and legal grounds for processing personal data. Below you will find a summary of our purposes and legal grounds, including which categories of personal data that are processed in each case.

<b>Purpose</b>	<b>Category of personal data</b>	<b>Legal ground</b>
To enter into, supply and administer our relationship with you	Identification information, contact information, payment information, information on goods and services, financial information, data related to services, device information	Contractual obligation
To perform credit assessment before granting credit	Identification information, contact information, financial information, information on origin of assets and relationships to legal persons, information on goods and services, tax residency	Legal obligation
To supply additional services, carry out customer surveys and market analyses	Identification information, contact information, information on goods and services, information on preferences and customer satisfaction	Legitimate interest
To verify identities, to prevent, discover, investigate and report potential money laundering or financing of terrorism, controls of subjects to financial sanctions and whether customers are	Identification information, contact information, financial information, information on origin of assets and relationships to legal persons, information received and/or created when	Legal obligation

<b>Purpose</b>	<b>Category of personal data</b>	<b>Legal ground</b>
persons in a politically exposed positions	fulfilling a legal obligation, tax residency	
To approve and manage access control and functionality of digital services and to prevent abuse of the same	Identification information, data related to services, device information	Legitimate interest
To improve technical systems and IT infrastructure	Identification information, information on goods and services, device information, information on preferences and customer satisfaction	Legitimate interest
To establish and defend legal claims	Identification information, contact information, payment information, information on goods and services, financial information, information on origin of assets and relationships to legal persons, data related to services, information received and/or created when fulfilling a legal obligation, tax residency, sound recordings	Contractual and/or legal obligation depending on the type of claim
To improve interactions between customers and Customer Services and to conduct quality assurance	Sound recordings of telephone calls which may include identification information, contact information, payment information, information on goods and services, financial information	Legitimate interest

Further information regarding our assessment of legitimate interest can be received upon request.

#### 4. Profiling, personal offers and automated decision-making

We employ automatic decision-making for credit assessments and risk management.

Profiling refers to automatic processing of personal data used to assess credit worthiness of our customers, in order to analyze or predict financial situation or, for transaction monitoring, to counteract fraud or money laundering and financing of terrorism.

Information regarding automated decision-making can be found in the general terms for each specific service.

You have the right to not be the subject of an automated decision based on solely automated processing, including profiling, that has legal consequences for you or which affects you in a similarly significant way.

#### 5. Recipients of personal data

In order to deliver our services to you and depending on the service, we may share your personal data with one or more of the following categories of recipients:

##### 6.1 The Swedbank Group

Data may be shared within the Swedbank Group (which PayEx is a part of as a wholly-owned subsidiary) based on our legitimate interest to conduct business. Companies in the Swedbank Group may also act as processors in the delivery of our services.

##### 6.2 Subcontractors and Suppliers

We may share personal data with processors such as consultants, suppliers of software and storage and companies providing printing services.

##### 6.3 The Authorities

We may disclose information to authorities such as the police, tax and enforcement agencies, financial supervisory and other supervisory agencies in our countries of operations when we have a legal obligation to do so, for instance to prevent money laundering and to counteract terrorist financing.

##### 6.4 Credit rating institutions

We may share personal data with a credit rating institution when you apply for a credit service, such as a credit account.

##### 6.5 PayEx corporate customers

We transfer your personal data when you make a purchase in a store or online, to administer transactions and/or invoicing.

##### 6.6 Payment service providers

We may share your personal data with payment service providers (PSPs) in order to process payments within some of our services.

##### 6.7 Companies working with financial crime prevention

To prevent criminal activities such as fraud, we may share your personal data with companies that perform controls and verification of identity and accuracy of the information you have provided us with.

##### 6.8 Debt collection agencies

We may share your personal data when reporting to credit agencies or when selling unpaid debts to third parties.

## 6. Security measures

PayEx protects the confidentiality of your personal data through the implementation of appropriate technical and organizational security measures that prevent unauthorized access, illegal processing or removal of data, unintentional loss, amendment or destruction.

If you wish to receive more information on how we work with technical and organizational security measures, please contact us (contact information is provided in section 11).

## 7. Cookies

Cookies are small text files stored on your computer (or mobile phone or other device connected to the Internet) when you visit a website. We use cookies on our websites (payex.se, payex.no, payex.dk and payex.fi, swedbankpay.se, swedbankpay.no, swedbankpay.dk, swedbankpay.fi).

Necessary cookies enable basic functions, such as navigation, whereas performance cookies may be used to enable other website functionality and statistics to help us understand how you interact with the website.

If you wish to receive more information about our use of cookies and the way they may collect information about you, please see our cookie policy available on our websites.

## 8. Geographical area for personal data processing

In general, your personal data will be processed within the European Union/European Economic Area (EU/EEA). We may however transfer and process your information outside the EU/EEA in exceptional cases, such as when you use your card outside of this geographical area.

We will always ascertain that the country on question has an adequate level of protection and/or that appropriate security measures have been implemented at the processor, for instance through the signing of standard contractual clauses (SCC).

You can receive further information on the transfer of personal data outside the EU/EEA upon request.

## 9. Storage periods

Your personal data will not be retained for longer than strictly necessary; this normally means that we will store only relevant information for as long as we have an ongoing relationship and for a maximum of 10 (ten) years thereafter, depending on the relevant legislations that apply to our business, for instance, counteracting money laundering (5 years) and accounting (5, 6 or 7 years depending on).

## 10. Your rights regarding your personal data

10.1 You have the right to demand that your personal data is completed if incomplete or corrected if incorrect.

10.2 You have the right to object against certain types of processing.

10.3 Under certain circumstances, you have the right to demand deletion of your personal data.

10.4 Under certain circumstances, you have the right to request restricted processing of your personal data.

10.5 You have the right to receive information on which personal data we process about you and, in such case, request access to your personal data.

10.6 When personal data is processed based on your consent, you have the right to revoke the consent at any time.

10.7 You have the right to be excluded from being subject to automated decision-making, including profiling, when such decision-making has legal or similarly significant consequences for you.

10.8 You have the right to submit complaints regarding the processing of personal data if you feel that the processing breaches your rights and interests. Complaints must be submitted to the national supervisory authority where you are registered.

Sweden: [www.imy.se](http://www.imy.se)

Norway: [www.datatilsynet.no](http://www.datatilsynet.no)

Denmark: [www.datatilsynet.dk](http://www.datatilsynet.dk)

Finland: [www.tietosuoja.fi](http://www.tietosuoja.fi)

## 11. Contact information

You may contact us with questions or requests for register access, to revoke a previously given consent, to object to direct marketing, or to exercise any of your rights regarding the processing of your personal data.

The easiest way is to get in touch with our Data Protection Officer, send an e-mail to:

[dpo@payex.com](mailto:dpo@payex.com)

or write to:

PayEx Sverige AB  
Attn: Data Protection Officer  
SE-621 88 Visby

Contact information for PayEx Group companies can be found at:

<https://payex.com/about-payex-group/company-information/>

## **12. Other data controllers and processors**

If a PSP or other party such as a physical store or an e-store is processing your personal data for purposes of their own, we kindly refer you to their respective privacy policy.

If processors are used to process your personal data or if personal data is transferred to other recipients, all processing occurs in accordance with the applicable law, our instructions and requirements. If you would like to know more about the processors we use, please contact us at [dpo@payex.com](mailto:dpo@payex.com).

## **13. Latest version of the principles for processing**

The latest version of this document is always available on our website at <https://payex.se/dataskydd>

You can also have a copy of the latest version sent to your home by calling our switchboard on +46 (0) 498 – 20 20 00.