

Privacy Notice

Principles for processing personal data

Valid from 25 May 2018

The principles of how PayEx processes personal data are described in the Principles for processing personal data, hereinafter referred to as the Principles.

If you conclude a purchase agreement for a service provided by a company belonging to the PayEx group, the company you purchase the service from is responsible for the processing of the personal data that you provide or which is otherwise collected in connection with the agreement.

If you purchase a financial service from PayEx, for example by opening a savings account or line of credit, this service is always purchased from PayEx Sverige AB (556735-5671), 621 88 Visby, which makes this the controller of the data being processed in connection with the agreement.

If you receive a debt collection claim from PayEx, the PayEx company that sent the claim is the controller of the personal data being processed in the collection matter. More information about this processing is found in the collection letter. The companies within the PayEx group that may be acting as the collection agent 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](#).

The Principles apply if a Customer uses, has used or has expressed an intention to use, or in any other way is associated with, one of the services supplied by PayEx, including such circumstances established before the Principles came into force.

1. Definitions

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

2. General terms

The Principles provide a general description of how PayEx processes Personal Data. Specific information on processing of Personal Data may also be contained in agreements and other documents related to PayEx services.

PayEx safeguards, within the scope of the applicable legislation, the confidentiality of Personal Data, and has appropriate technical and organisational measures in place to protect Personal Data from unauthorised access, illegal processing or removal of data, unintentional loss, amendment or destruction.

PayEx may use data processors to process Personal Data, or transfer Personal Data to other recipients. In such cases PayEx takes the necessary measures to ensure that the processors process the Personal Data in accordance with PayEx's instructions, as per the applicable law, and requires adequate security measures to be in place. If you would like to know more about the processors used by PayEx, please contact us at dpo@payex.com.

PayEx uses cookies on its website. A cookie is a small text file stored on your computer (or mobile phone or other device connected to the Internet) when you visit a website. Cookies can be used, for instance, to make the website more user-friendly. The PayEx cookies policy can be found [here](#).

3. Categories of Personal Data

Personal Data can be collected from a Customer, through the Customer's use of services and from external sources, such as from public and private registers, or from a third party.

Categories of Personal Data that PayEx mainly, but not exclusively, collects and processes are:

Identification Information such as name, personal ID number, date of birth, information on identity documentation (e.g. copy of passport, ID card).

Contact Information such as address, telephone number, e-mail address, communication language, etc.

Financial Information such as transactions, credits, income, debts, accounts and ownership.

Information on origin of assets and relationships to legal persons as well as other data that allows PayEx to carry out investigations with regard to money laundering and prevention of financing of terrorism, as well as to ensure that international sanctions are complied with, including the purpose of the business relationship and if the Customer is a person in a politically exposed position.

Information received and/or created when fulfilling a legal obligation such as information deriving from enquiries from authorities, such as the Swedish Tax Agency, courts, the Swedish Enforcement Authority, details of income, credit commitments, property holdings, records of non-payment and debts.

Information on the Customer's residence for tax such as information on country of residence, tax identification number, etc.

Communication Information collected when the Customer communicates with PayEx via e-mail, telephone, visual and/or sound recording, e-mail, messages and other communication tools, such as social media, Personal Data related to the Customer's visits to PayEx websites or communication via other PayEx channels, etc.

Data related to services such as the agreement's fulfilment or lack thereof, including completed transactions, concluded and cancelled agreements, submitted applications, enquiries and complaints, etc.

Information on habits, preferences and customer satisfaction such as activity level in use of services, which services are being used, personal settings, questionnaire responses, etc.

4. The purpose and legal basis for processing Personal Data

PayEx processes Personal Data mainly:

To manage the customer relationship and supply and administer access to products and services

To enter into and fulfil an agreement, keep Personal Data up to date and correct by verifying and updating Personal Data by means of external and internal registers based on: fulfilment of an agreement; or implementing measures at the Customer's request before entering into an agreement; or due to compliance with legal obligations.

To carry out credit and risk assessments

To carry out credit and risk assessment in order to determine which services and products, and terms, may be offered to a Customer, and to comply with the applicable legislation with regard to credit and other risk assessment when providing credit and other financial services, capital requirements for PayEx, internal calculations and analyses based on: fulfilment of an agreement; or implementing measures at the Customer's request before entering into an agreement; or compliance with legal obligations; or PayEx's legitimate interest in healthy risk management.

To protect the Customer's and/or PayEx's interests

In order to guarantee PayEx's and/or the Customer's security and other rights for PayEx and the Customer (visual and/or recording) based on: the legitimate interests of PayEx to protect its Customers, employees, visitors and their and PayEx's assets.

To supply additional services, carry out customer surveys and market analyses and compile statistics

To offer the Customer other services from PayEx or carefully selected partners, including personal offers based on: consent from the Customer; or PayEx's legitimate interest in offering additional services.

To carry out customer surveys and market analyses, and compile statistics; organise competition and campaigns for a Customer based on: consent from the Customer; or PayEx's legitimate interest in improving PayEx services, improving the Customer's experience as a user of the services and developing new products and services.

Compliance with legal obligations and verification of identity

To follow the applicable legislation, including in relation to checks (due diligence) of the Customer, prevent, discover, investigate and report potential money laundering or financing of terrorism, if the Customer is subject to financial sanctions or if the Customer is a person in a politically exposed position and to verify identity based on: fulfilment of the contract; or implementing measures at the Customer's request before entering into an agreement; or compliance with legal obligations; or PayEx's legitimate interest in healthy risk management and corporate governance.

To prevent the misuse of services and safeguard suitable conditions for the services

To approve and manage access control and functionality of digital channels, prevent unauthorised access and abuse of such channels and to safeguard information security based on: fulfilment of an agreement; or implementing measures at the Customer's request before entering into an agreement; or compliance with legal obligations; or consent from the Customer; or PayEx's legitimate interest in controlling access to and the functionality of digital services.

To improve technical systems and IT infrastructure, adapt display of the service to the Customer's user device, and develop PayEx service, including by testing and improving technical systems and IT infrastructure based on: PayEx's legitimate interest in improving technical systems and IT infrastructure.

To establish, exercise and defend legal claims

To establish, exercise and defend legal claims based on: fulfilment of the agreement; or being able to implement measures at the Customer's request before the agreement is entered into; or compliance with legal obligations; or PayEx's legitimate interest in taking legal measures.

5. Profiling, personal offers and automated decision-making

5.1 Profiling refers to the automatic processing of Personal Data used to assess certain personal characteristics of the Customer in order to analyse or predict, for instance, the Customer's financial situation; or, for transaction monitoring, to counteract fraud or money laundering and financing of terrorism. Automatic decision-making is used for credit assessments and risk management. The above is undertaken to comply with legal obligations, to fulfil an agreement with the customer or based on PayEx's legitimate interest in providing customised services.

5.2 PayEx may process Personal Data in order to improve the Customer's user experience of the digital services, for example by adapting display of the services to the Customer's user device and by creating suitable offers. PayEx may also process Personal Data in order to provide customised offers of PayEx services. Such marketing may be based, among other things, on services used by the Customer and how the Customer uses such services, as well as how the Customer relates to PayEx's digital channels.

If you do not want to receive direct marketing from PayEx, you can send an e-mail to dpo@payex.com

6. Recipients of Personal Data

Personal Data is shared with other recipients, such as:

- 6.1 Authorities, such as the Swedish Tax Agency, the Swedish Enforcement Authority, the Swedish Financial Supervisory Authority and other supervisory authorities.
- 6.2 the Swedbank Group (which PayEx is part of as a wholly-owned subsidiary).
- 6.3 Third parties who maintain databases and registers, e.g. credit registers, population registers, trade registers, securities registers or other registers that contain or supply Personal Data, and insolvency administrators.
- 6.4 Credit rating institutions.
- 6.5 Merchants where you make a purchase.
- 6.6 Processors with whom PayEx shares Personal Data as per point 2.3 above.

7. Geographical area for personal data processing

7.1 In general, the Personal Data will be processed within the European Union/European Economic Area (EU/EEA), but may in some cases be transferred and processed in countries outside the EU/EEA.

7.2 Transfer and processing of Personal Data outside the EU/EEA may occur where there is a legal basis to do so, i.e. in accordance with a legal obligation or the Customer's consent, and where appropriate security measures are in place. Appropriate security measures means that:

- There is an agreement in place that includes EU standard agreement clauses or other approved clauses, codes of conduct, certifications, etc. approved in accordance with the General Data Protection Regulation;
- The country outside the EU/EEA where the recipient is located has a suitable level of data protection as determined by the EU Commission;
- The recipient is certified in accordance with Privacy Shield (applies to recipients in the USA).

7.3 On request, the Customer can be given further information on the transfer of Personal Data to countries outside the EU/EEA.

8. Storage periods

Personal Data will not be processed for longer than is necessary. Personal Data will be saved for as long as the agreement relationship is in force and for a maximum of 10 years thereafter, with consideration of the rules on statutory limitation. In some cases, the data may be saved for a longer period due to the legislation on capital requirements which PayEx must comply with. Other deadlines may also apply when Personal Data is saved for purposes other than due to the agreement relationship. The storage period may then be based on PayEx complying with the relevant legislation with regard to, for instance, counteracting money laundering (5 years) and accounting (7 years).

9. The customer's rights as the data subject

A Customer (data subject) has rights relating to the processing of the Customer's Personal Data. Such rights include, in general, the right to:

- 9.1 Demand that Personal Data be corrected if it is insufficient, incomplete or incorrect.
- 9.2 Object against certain processing of the Customer's Personal Data.
- 9.3 Demand deletion of Personal Data.
- 9.4 Restrict the processing of Personal Data.
- 9.5 Receive information on Personal Data processed by PayEx and, in such a case, receive a copy of the said Personal Data. (Register excerpt)
- 9.6 Obtain Personal Data supplied by him/her and which is processed based on consent or an agreement in writing or in a commonly used electronic format and, where possible to have such Personal Data transmitted to another service provider (data portability).
- 9.7 Revoke consent to process the Customer's (the data subject's) Personal Data.
- 9.8 Not to be subject to complete automated decision-making, including profiling, if such decision-making has legal consequences or similarly significantly affects the Customer. This right does not apply if the decision-making is necessary for entering into or fulfilling an agreement with the Customer, or if the decision-making is permitted in accordance with the applicable legislation, or if the Customer has given their express consent.
- 9.9 Submit complaints regarding the processing of Personal Data to the Swedish Data Protection Authority, datainspektionen.se if the Customer feels that the processing of Personal Data breaches the Customer's rights and interests as per the law.

10. Contact information

10.1 The Customer can contact PayEx with questions, requests for register extracts, requests to revoke consent or object to direct marketing, or if the Customer wishes to request other rights or submit complaints regarding the processing of Personal Data. The easiest way to contact the PayEx Data Protection Officer is at dpo@payex.com.

10.2 Contact information for PayEx group companies can be found on the PayEx website at <http://payex.se/om-payex/foretagsinformation/>

To contact the PayEx Data Protection Officer and to exercise your rights as a data subject:

PayEx Sverige AB

Attn. Data Protection Officer

SE-621 88 Visby

dpo@payex.com

11. Latest version of the Principles

The latest version of the Principles is always available on our website at payex.se/dataskydd. You can also have a copy of the latest version sent to your home by ringing our switchboard on +46 (0)498-20 20 00.