

Information about MobilePay's processing of personal data

Effective from 3rd of May 2023

Vipps MobilePay, branch of Vipps MobilePay AS, Norway ("MobilePay") is an e-money institution that resides in Denmark and offering payment platforms, payment solutions and other services to its customers in Greenland and Denmark. Vipps MobilePay AS is the data controller for the processing of its customers' personal data described in this privacy notice.

MobilePay is a part of Vipps MobilePay AS, which consists of Vipps MobilePay AS and its branches.

As part of our business, we collect and process data about you (personal data). We do this to offer you the best services and solutions, to comply with our agreements with you and to meet various statutory requirements.

As part of our activities, we also collect and process data about you (personal data) when you interact with us as a person linked to one of our business customers. You may be an authorised signatory, beneficial owner, director, employee, guarantor, pledger or third party linked to our business customer. Additionally, we also treat information concerning sole-traders as personal data if the data is individually identifiable and if the information relates to them as an individual.

We take all relevant measures to protect your personal data in accordance with the applicable legislation.

This information about our processing of personal data describes how MobilePay protects your personal data and your statutory rights and freedoms.

Why do we collect and process your personal data?

We collect and process data about you to enable us to offer you the best services and solutions, to protect you against fraud, to fulfil our agreements with you and to meet the statutory requirements imposed on us as an e-banking institution.

This means that we collect and process personal data when:

- You have entered into or are considering entering into a contract with us regarding a service or a product, therefore we need to process the data to be able to perform our part of the contract. See Article 6.1(b) of the General Data Protection Regulation
- You have given us your consent to use your personal data for one or more specific purposes, see Article 6.1(a) of the General Data Protection Regulation
- We process the data to comply with a legal obligation, see Article 6.1(c) of the General Data Protection Regulation, for example in accordance with; Anti Money Laundering Act, Tax Act, Bookkeeping Act, Payment Act, Data Protection Act and Civil Registration System Act
- Processing is necessary to pursue the legitimate interests of MobilePay, see Article 6.1(f) of the General Data Protection Regulation. For example, this may be to prevent unauthorised use or loss, to strengthen IT and payment

security and/or as part of direct marketing purposes. In this context, we only collect and process your personal data if our interest overrides your interest, and your rights are not adversely affected by such processing.

- Where processing is beneficial for the third party that you and MobilePay are linked to (e.g. a business customer), to pursue a legitimate interest, see Article 6.1(f) of the General Data Protection Regulation. For example, if the business customer has a business or commercial reason for processing your personal data, such as to manage the services and products requested by the business customer, and to give you the necessary access to digital services. Or if such data sharing will aid MobilePay or the business customer to live up to trading standards and comply with legal obligations in an easier and practical manner such as for the validation of customers age where it is necessary to validate under national legislation.

What personal data do we collect and process?

We collect and process different types of personal data depending on what services or products you have ordered or are interested in, including

- Basic personal data, e.g. your name, contact details, address, telephone number, nationality and country of

- residence as well as your civil registration (CPR) number
- Financial information, e.g. your income, if relevant
- If necessary, information about your occupation, if relevant
- Information about your family and household, if relevant
- Identity documentation, such as a photocopy of your passport, driving licence or birth certificate
- Account numbers and parts of payment card numbers
- Messages and pictures, if relevant
- Location (geographical), if relevant
- How you use our apps, what mobile device you use, your operating system and your IP address, including traffic data, location data, behavioural data, and other communication data
- Information about the services and products we provide to you, including how you use them and your preferences in this connection.

We may process other types of personal data if it is necessary for the specific product or service we provide or if it is required by law.

Sensitive data

- We collect sensitive data to the extent necessary to offer you a product or service. In those cases, we ask for your explicit consent, see Article 9(2)(a) of the

General Data Protection Regulation, for details.

- If we have a statutory right to collect sensitive data, for example in connection with legal claims or our obligation to prevent or detect fraud or money laundering and other types of crime see Article 9.2(f) of the General Data Protection Regulation.

Our ability to offer you the best services and solutions greatly depends on how well we know you. Consequently, it is important that the information you provide to us is correct and accurate and that you inform us of any changes.

When and how do we collect and process your personal data?

We collect and process personal data for onboarding purposes in relation to identification and verification and in connection with our provision of our services and products, specifically to be able to ensure that these products and services function properly, including;

- Payment services
- Connected functions
- Digital solutions

We also collect and process the data in connection with other activities related to specific services and products, including;

- Customer service and administration
- Communication of necessary information regarding our services and products

- Development and management of our products, services and business by using data analytics and statistics, including to test our systems
- Marketing of our services and products- if we have your permission for this or are allowed such marketing by law. We use cookies and similar technology on our website, including for marketing via digital channels and social media platforms such as Facebook. We refer you to our cookie policy for further information. If we have your permission, we track your interests based on your preferences when interacting with our application, websites, emails, or text messages. We look at your active engagement such as clicking on URL links to open content or swiping a button to consent to a service. We also look at the transactions you perform, the aggregation and segmentation (i.e., division into relevant target groups) of this data in order to gain insight and to communicate to you and other users, i.e., to create customised messages based on statistical applications, websites or application use patterns or to engage with our social media platforms and other digital marketing.
- Fixing of fees and prices for our services and products
- Identification, verification, and approval of customers
- Risk management
- Recovery of outstanding debt

- To protect you and Vipps MobilePay AS and its branches against fraud and to meet statutory requirements such as prevention of money laundering.

We collect the data directly from you or by observing your actions, e.g., when:

- You fill in applications or other forms when ordering services and products
- You submit specific documents to us
- You talk to us on the phone. When you call us and when we call you at your request or to follow-up on your inquiry, the conversation may be recorded and stored for documentation and security purposes. Before an employee answers a call or before you enter a call queue, you will be notified if the call is being recorded. However, in a few situations, for example in case of a long waiting time, your call may be redirected to a non-recorded employee without you being notified thereof
- You use our website, our mobile applications, products and services
- You participate in customer surveys or promotions that we have organised
- You communicate with us via electronic media, including emails.

Third parties and your personal data Personal data from third parties

We obtain and process your personal data from third parties, including from:

- Enterprises, banks, payment, and service providers, including the services for which you have registered. We collect and process data to execute payments and prepare payment summaries and the like. In addition, we process the data to provide the services you receive from us.
- The Danish Central Office of Civil Registration (CPR) and other publicly accessible sources and registers. For example, we collect and process the data to verify the accuracy of your data such as your age.
- The bank with which you have your beneficiary account as a business customer.
- The bank(s) with which you have your beneficiary account and/or sender account or linked payment card as a private customer.
- Vipps MobilePay AS and its branch entities. We collect and process data from the entities' notifications to the State Prosecutor for Serious Economic and International Crime (SØIK) in accordance with the Danish Anti-Money Laundering Act.

Third parties and group companies with whom we share your personal data

In some cases, we share your personal data with third parties:

- If you have asked us to transfer an amount to another beneficiary, we disclose the data about you which are

necessary to identify you and perform the contract. The same applies if you have registered for services in MobilePay that require that the third party receives data about you if we have your consent, or if we are entitled/required to do so by law.

- The bank(s) with which you have your beneficiary account and/or sender account or linked payment card as a private customer. We do this to verify that the payment card/account belongs to you and can be used for payments.
- External business partners (including Vipps MobilePay AS and its branches business customers) if we obtained your consent to do so or if it is permitted under existing legislations.
- Service providers authorised as an account information service, payment initiation service or card-based payment instrument provider, if you request such a service provider to receive information about you.
- We disclose data about you to public authorities if we are required to do so by law or in accordance with court orders or requests from the police, the enforcement court or other authorities.
- This could include the State Prosecutor for Serious Economic and International Crime (SØIK) in accordance with the Danish Anti-Money Laundering Act, the Danish tax authorities in accordance with the Danish Tax Control Act and the Danish central bank (Danmarks

Nationalbank) for statistical and other purposes.

- We may disclose your data to individuals holding a power of attorney, lawyers, accountants, or others you have authorised us to share the information with.
- We may disclose your data to third parties who process personal data on our behalf as a "data processor".

Data Transfers to non-EU/EEA Countries

- We may transfer your personal data to the partner banks in Greenland who are acting as controllers, if any transactions to be made in connection with Greenland. Also, we may transfer your personal data to the public authorities within Greenland if we have legal obligation to do so.
- We transfer personal data to data processors, including data processors in third countries outside the EU and the EEA, in connection with IT development, hosting and support.
- We ensure that your rights are protected and that the level of protection is maintained in connection with such data transfers, e.g., through the use of standard contracts approved by the European Commission or the Danish Data Protection Agency (Datatilsynet). You can obtain a copy of these standard contracts by contacting us.

For how long do we store your personal data?

We store your data for as long as it is necessary for the purpose for which your data have been collected and are being processed. We therefore always store your data for as long as we provide a financial service or product to you. When your business relationship with us terminates, we will usually store your data for another 7 years. We do this primarily to meet our obligations under the Danish Bookkeeping Act, the Danish Anti-Money Laundering Act, and the Danish Financial Supervisory Authority's requirements. In certain circumstances, we store your data for a longer period of time. This applies, for example, if the statute of limitation is 10 years, in which case we can store the data for up to 10 years.

Profiling and automated decisions

Profiling

Profiling is a form of automated processing of your personal data. We only use profiling and data modelling to prevent money laundering, to detect fraud and the risk of fraud and to assess the likelihood of default.

Automated decisions

With automated decisions, we use our systems to make decisions based on the data we have about you. For example, we use automated decisions to prevent fraud. Automated decisions enable us to make sure that our decisions are quick, fair, efficient, and correct based on the data we have.

Your rights

Right of access to your personal data and to obtain information

You may access the personal data which we have collected and which we process, including where they come from and the purposes for which they are processed. You can obtain information about the period for which we store your data and about who receives data about you, to the extent that we disclose personal data in Denmark and abroad. Your right of access may, however, be restricted by legislation, or the data may be subject to an exemption from the right of access such as the overriding interest of another data subject, public interest and national defence, or protection of our business secrets and practices.

You can obtain information about how an automated decision was made and the effects of the decision, and you are entitled to manual processing of any automated assessment.

Right to object

In certain circumstances, you have the right to object to our processing of your personal data. This applies, for example, when the processing is based on our legitimate interests.

Rectification of data

If data is inaccurate, you are entitled to have the data rectified. If data is incomplete, you are entitled to have the data completed, including by means of providing us with a supplementary statement.

Right to erasure (Right to be forgotten)

You are entitled to have your data erased if the data is no longer necessary in relation to the purposes for which it was collected. However, please note that your data might not be deleted right away if we are obliged to retain data under existing legislations or if it is necessary for the establishment, exercise, or defence of a legal claim.

Restriction of processing

If you believe that the data, we have collected about you are inaccurate, or if you have objected to our use of the data, you may demand that we restrict the processing of the data to storage. Processing will be restricted to storage only until the accuracy of the data can be verified, or until it can be checked whether our legitimate interests override your interests.

If you are entitled to request us to erase the data, we have collected about you, you may instead request us to restrict our processing of such data to storage. If we only need to process the data, we have collected about you to assess a legal claim, you may also demand that other processing of the data be restricted to storage. However, we may be entitled to process the data for other purposes, including to assess a legal claim, or if you have granted your consent to this.

Withdrawal of consent

You may withdraw your consent at any time. Please note that if you withdraw your consent, we may not be able to offer you specific services or products. You should also note that we may

continue to process your personal data, e.g., to perform an agreement we have entered with you or if we are entitled to do so by law.

Data portability

If we process data based on your consent or an agreement, and the data processing is automated, you have a right to receive a copy of your data in an electronic machine-readable format.

Updates

We update this information about our processing of personal data on a regular basis. In case of a change, the 'effective from' date at the top of this document will be amended. Any changes to this information about our processing of personal data apply to you and your data with immediate effect. If changes affect how your personal data are processed, we will take reasonable steps to notify you of the changes.

Contact details and how to complain

You are always welcome to contact us if you have any questions about your rights or if you want to enforce them or you would like to hear more about how we collected and process your personal data. You can contact our data protection department at privacy@vippsmobilepay.com

If you are dissatisfied with how we collected and process your personal data and your contact with our data protection department has not led to a satisfactory outcome, you can contact our complaints handling service: Vipps MobilePay, branch of Vipps MobilePay AS, Norge, Vester Søgade 10, 6th, DK-1601 Copenhagen V, email:

klage@mobilepay.dk. You can also lodge a complaint with the Danish Data Protection Agency: Datatilsynet, Carl Jacobsens Vej 35, 2500 Valby Tlf. 33 19 32 00, <https://www.datatilsynet.dk> email: dt@datatilsynet.dk or with the Norwegian Data Protection Authority: Datatilsynet, P.O. Box 458 Sentrum NO-0105 Oslo Tlf. +47 [22 39 69 00](tel:22396900), postkasse@datatilsynet.no