

# Privacy Policy

## 1. GENERAL INFORMATION

Open Payments Europe AB, company registration number 556973-2737, having its registered address at Torsgatan 8E, 111 23, Stockholm (“**Open Payments**” “**we**” or “**us**”). This document contains a policy statement regarding Open Payments’ collection, use and processing of Personal Data (“**Privacy Policy**”). This privacy policy is applicable when you use our service Open Payments Services as described in the Terms and Conditions for Open Payments Services the (“**Service**”).

All definitions in this Privacy Policy shall be interpreted in accordance with applicable data protection laws which refers to the General Data Protection Regulation (Regulation no. 2016/679) and the Directive on Privacy and Electronic Communications (Directive 2002/58/EC), as well as the national implementations and related national legislation.

## 2. PROCESSED DATA

We will process the following personal data when you are using the Service after having registered an account for the Service for the purposes and legal ground set out below in section 3:

- (a) name;
- (b) email address;
- (c) telephone number;
- (d) company ID & name;
- (e) IP address;
- (f) information about your use of the Service;
- (g) PEP identification;
- (h) beneficial owner;

We are unable to provide you with the Service unless you provide us with the personal data above. The processing of the personal data above is necessary to enter into the agreement with us and is necessary to maintain the contractual relationship between you and us, and for you to use the Service.

## 3. PURPOSES OF PROCESSING AND LEGAL GROUND

We will process the personal data set out above for the following purposes: to inform you about updates of the Service or the terms and conditions, to administrate your user account, to enable and provide the Services and integration with third party services, to ensure the technical functioning of the Service and to prevent use of the Service in breach of the terms, and to otherwise provide the Service according to the terms and conditions on the legal ground fulfilment of contract;

to send you alerts or messages by e.g. email, including to provide you with marketing of our and our related parties’ products and services based on our legitimate interest

to provide you with information and marketing about Open Payments existing and future services;

to improve and develop the Service or new services and products and to analyse your use of the Service based on our legitimate interest to improve our service; to enforce the terms of use, including to protect our rights, property and safety and also the rights, property and safety of third parties if necessary based on our legitimate interest to maintain sufficient IT-security, to evade fraud and to protect the Service from cyber threats or illegal activities as well as to protect Open Payments in the event of a legal proceeding connected to the personal data ; and to fulfil requirements by law to which we are subject, for example to prevent anti money laundry (AML).

#### **4. DISCLOSURE OF PERSONAL DATA**

We may share and disclose your personal data to banks who are integrated in the Service, service providers hosting the Service, IT-suppliers and suppliers engaged by Open Payments for Open Payment's marketing efforts. Open Payments may also disclose personal data if required under applicable law or due to a decision of a competent authority.

Please note, when using the Service you may be directed to other websites where the personal data collected is not in our control. The privacy policy of the other website will govern the personal data obtained from you on that website.

#### **5. RESPONDING TO LEGAL REQUESTS AND PREVENTING HARM**

We may access, preserve and share your personal data in response to a legal request (like a search warrant, court order or a subpoena or the like), or when necessary to detect, prevent and address fraud and other illegal activity, to protect ourselves, you and other users, including as part of investigations.

#### **6. COOKIES, PIXELS AND OTHER SYSTEM TECHNOLOGIES**

We collect information by using technology such as cookies, pixels and tags (on your browser or device). For information about how we use this type of technologies, please see our cookie policy (available here [\[insert hyperlink\]](#)).

#### **7. RETENTION**

We store your personal data up to five years for Open Payments to fulfil the purposes for which the personal data was collected and to perform the Service. However, Open Payments may retain personal data for a longer period of time if required by law or in order for Open Payments to protect itself in the event of a legal proceeding.

#### **8. DATA SECURITY**

We aim to ensure that you at all times remain confident in trusting Open Payments with your personal data. In this respect, Open Payments has implemented adequate security and organizational measures necessary to protect your personal data.

#### **9. YOUR RIGHTS**

You have the right to request access and further information concerning the processing of your personal data, or request that we correct, rectify, complete, erase

or restrict the processing of your personal data. You have the right to obtain a copy of the personal data that we process relating to you free of charge. For any additional copies requested by you, we may charge a reasonable fee based on administrative costs.

If the processing is based on the legal grounds consent or fulfilment of contract you have the right to data portability. Data portability means that you can receive the personal data that you have provided to us, in a structured, commonly used and machine-readable format, and have the right to transfer such data to another data controllers.

## **10. CONTACT INFORMATION**

To exercise your rights, or if you have any questions regarding our processing of your personal data, please contact us at the following address:

Open Payments Europe AB  
Attn. Function Responsibility  
Torsgatan 8E 111 23 Stockholm  
Sweden

Or by using our contact form and writing “Privacy” in the subject field: <https://www.openpayments.io/company#contact>. Note that you should sign the request to receive information of the processing of your personal data yourself.

If you have any complaints regarding our processing of your personal data, you have the right to file a complaint to the competent data protection authority. You can find out more about the local data protection authorities under the following link [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)

## **11. NOTICE OF CHANGES TO THE PRIVACY POLICY**

If we make changes to this Privacy Policy we will notify you via our website, by posting a new version of the Privacy Policy with reasonable advance notice. If your consent is required due to the changes, we will provide you additional prominent notice as appropriate under the circumstances and, ask for your consent in accordance with applicable law.