

## Information about Airwallet's processing of personal data

*Effective June 29, 2020*

As part of our business, we record and use information about you (personal data). We do this to offer you the best solutions, to comply with our agreements with you and to comply with various legal requirements.

As part of our activities, we also record and use information about you (personal information) when you interact with us as a person affiliated with one of our corporate clients. You may be an underwriter, legal owner, director, employee, or third party affiliated with our corporate client.

We take all appropriate measures to protect your personal information following applicable law.

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

### Why do we register and use your personal information?

We record and use information about you to provide you with the best advice and solutions, to protect you from fraud, to comply with our agreements with you, and to comply with the legal requirements we are required to provide.

This means that we register and use personal data when:

- You have entered into or are considering entering into an agreement with us on a service or product, cf. the Personal Data Regulation. Article. 6.1(b)
- You have given us consent to use your data for a specific purpose, cf. the Personal Data Regulation. Article. 6.1(a)
- We are legally obligated to do so, cf. the Personal Data Regulation. Article. 6.1(c), e.g.
  - The Money laundering Act
  - Bookkeeping Act
  - Payments Act
  - The Data Protection Act
- It is necessary to pursue legitimate interests of Airwallet, cf. the nature of the Personal Data Regulation. 6.1(f). This may be, for example, to prevent abuse or loss, to strengthen IT and payment security, and/or as part of direct marketing purposes. In this context, we only record and use your personal information if our interest clearly outweighs your interest in not processing your personal information.

- When necessary, in order for Airwallet or the business customer to whom you are affiliated to pursue a legitimate interest, cf. the Personal Data Regulation article. 6. I. (f). It may be if Airwallet or the business customer have a business or commercial justification for using your personal information, such as managing the services and products requested by the business customer and providing you with the necessary access to digital services. We may also use your personal information if we need it to prevent abuse and loss or to enhance IT and payment security and/or as part of direct marketing purposes. In this context, we will only use your personal information if our interest clearly outweighs your interest in not processing your personal information.

## What personal information do we record and use?

We record and use different types of personal information depending on what services or products you have ordered or are interested in, including:

- Basic personal information, such as your name, contact information, address, telephone number, citizenship and country of residence
- any information about your profession
- ID documentation, eg photocopies of passports, driver's licenses or birth certificates
- Account numbers and parts of payment card numbers
- How to use our apps, what mobile device you use, your operating system and your IP address
- Information about the services and products we provide to you, including how to use them and your preferences in this regard.

### *Sensitive information*

We only record sensitive information to the extent necessary to advise you or offer you a product or service.

We may also register other personal information if necessary to provide you with certain products or services or if required by law.

## Why and how do we register and use your Personal Information?

We record and use personal information in connection with the delivery of our services and products, including:

- Payment services
- Associated functions
- Digital solutions.

We also record and use the information in connection with other activities related to certain services and products, including:

- Customer service, consulting and administration
- Development and administration of our products, services, and business, including testing our systems
- Marketing our services and products
- Setting fees and prices for our services and products
- Identification and approval of customers
- Risk management
- To protect you and Airwallet from fraud
- To meet statutory requirements.

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

- You fill out applications or other forms when ordering services and products
- You submit certain documents to us
- You talk on the phone with us. When you call us and when we call you at your request or as a follow-up to your inquiry, the conversation can be recorded and stored for documentation and security purposes. You will be informed if the conversation gets recorded. However, in a few cases, for example, during long waiting times, your call may be forwarded to an employee where the call is not recorded anyway, without being notified.
- You use our website, our mobile apps, products and services
- You participate in customer surveys or campaigns that we have organized
- You communicate with us via electronic media, including e.g. e-mails.

## How long do we store your personal information?

We store your information for as long as necessary for the purpose for which your data has been recorded and used. Therefore, we always store your information as long as we provide a service or product to you. When your business relationship with us has ended, we usually store your information for another 7 years. This is primarily done to fulfill our obligations under the Accounting Act, the Money Laundering Act, and the requirements of the Danish Financial Supervisory Authority. In some cases, we store your information for an extended period of time. This applies, for example, if the limitation period is 10 years, in which we can store the information for up to 10 years.

## Third parties and your personal information

## Third parties with whom we share your personal information

In some cases, we share your personal information with third parties inside and outside the Airwallet:

- If you have asked us to transfer an amount to another recipient, we will provide the information about you that is necessary to identify you and fulfill the agreement.
- The bank(s) from which you, as a private customer, have your recipient and/or sender account or associated payment card. We do this to identify that the debit card/account belongs to you and can be used for payments.
- We disclose information about you to public authorities where required by applicable law or as a result of court orders and inquiries from the police, bailiff or other authorities, including the State Attorney for Special Economic and International Crime (SEIC) in accordance with the Danish Money Laundering Act, to the tax authorities in accordance with the Tax Control Act and to Danmarks Nationalbank in connection with statistical purposes and similar purposes.
- We may disclose your information internally within the company and to external business partners if we have your consent or we have a statutory right to do so, for example, by submitting court orders.
- In connection with IT development, hosting, and support, we transfer personal data to data processors, including third-country data processors outside the EU and the EEA. We ensure that your rights are protected and that the level of protection is maintained in connection with such data transfers, for example through the use of standard contracts approved by the European Commission or the Data Protection Agency. You can get a copy of these standard contracts by contacting us.

## Profiling and automated decisions

### Profiling

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

### Automated decisions

With automated decisions, we use our systems to make decisions based on the information we have about you. For example, we use automated decisions to prevent fraud. Automated decisions enable us to ensure that our decisions are fast, fair, efficient, and accurate based on the information we have.

## Your rights

### Insight into your personal information

You can gain insight into the personal data we have recorded and use, including where they come from and what we use them for. You can find out how long Airwallet stores your information and who receives information about you, to the extent we disclose personal data in Denmark and abroad. However, your right to access may be limited by law or exempt from the right of access.

### Manual treatment

You can gain insight into how an automated decision is made as well as the effects of the decision, and you are eligible for manual processing of any automated assessment.

### Right to object

In some cases, you have the right to object to our processing of your personal data. This applies, for example, when the treatment is based on our legitimate interest.

### Opposition to direct marketing

You have the right to object to our use of your personal data for direct marketing purposes, including profiling in connection with such purpose.

### Correction or deletion of Airwallet data

If our data is incorrect, incomplete, or irrelevant, you are entitled to have the information corrected or deleted with the restrictions resulting from applicable law or rights to process data. These rights are referred to as "the right to rectification", "the right to erase" and "the right to be forgotten".

### Limited use

If you believe that the information we have recorded about you is incorrect or you have objected to our use of the information, you may require that we limit the use of the information for retention. Use is limited only until the accuracy of the information can be verified or until it can be verified that our legitimate interests outweigh your interests.

If you are eligible to request us to delete the information we have recorded about you, you may instead request us to limit the use of this information for retention. If we only need to use the information we have recorded about you to assess a legal claim, you may also require that other uses of the information be restricted to retention. However, we may be entitled to use the information for other purposes, including to assess a legal claim or if you have consented to it.

## **Withdrawal of consent**

You can revoke consent at any time. Please note that if you revoke consent, we may not be able to offer you certain services or products. Please note that we also continue to use your personal information, eg to comply with an agreement we have entered into with you, or if we have a statutory right to do so.

## **Data portability**

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

## **Updates**

We regularly update this information about our processing of personal data. In the event of a change, the "applicable from" date will change at the top of this document. Any changes to this information regarding our processing of personal data apply immediately to you and your data. If changes affect how your personal information is processed, we will take reasonable steps to tell you about the changes.

## **Contact information and appeal**

You are always welcome to contact us if you have any questions about your rights and how we register and use your personal information. You can contact our data protection department at [kontakt@airwallet.net](mailto:kontakt@airwallet.net). If you are unsatisfied with how we register and use your personal information, we can be contacted on +45 7870 9999.