

NARVI PAYMENTS OY AB'S PRIVACY NOTICE

With this Privacy Notice we provide you information on why and how we process your personal data in connection with our business operations.

We process your personal data for the following purposes as a controller:

- a) Provision of EMI services
- b) Provision of virtual currency services
- c) KYC (Know Your Customer)
- d) Communications

1) OUR INFORMATION

Contact information:

The controller of your personal data is Narvi Payments Oy Ab (business ID: 3190214-6), which is located at Maria 01 Lapinlahdenkatu 16, 00180 Helsinki.

We have appointed a DPO, whom you can contact via email at: privacy@narvipay.com.

Operations-related information:

We are an E-money Institution (EMI) and a Virtual Currency Provider (VCP) operating based on a license and registration issued by the Finnish Financial Supervisory Authority (FSA). We operate under the supervision of the FSA.

You can find more information about the controller's EMI license and VCP registration from the Financial Supervision Authority's [list](#) of supervised entities.

2) KEY TERMS AND REGULATIONS

Act on Payment Institutions (297/2010) is the law that governs businesses involving payment services.

Act on Payment Services (290/2010) is the law that governs the obligation to provide information, terms of contracts, and implementation related to payment services.

Act on Preventing Money Laundering and Terrorist Financing (444/2017) is the law that governs the prevention, detection, and investigation of money laundering and terrorist financing—also referred to as the AML Act hereinafter.

Act on Virtual Currency Providers (572/2019) is the law that governs VCPs.

Controller means the party responsible for processing the data subject's personal data.

Customer means our customers, the persons who execute payment transactions with our customers, the politically influential persons (so-called PEPs) associated with them, and the actual beneficiaries. In addition, in the case of a legal entity, the customer also means the contact persons of the legal entity.

Data subject is a term for a human being in accordance with data protection laws.

DPO is a term for an independent representative of a controller or a processor who helps the controller or the processor ensure that it complies with relevant data protection laws.

EMI is a licensed electronic money institution under the Act of Payment Institutions (297/2010).

KYC (Know Your Customer) means verifying the customer's identity, ascertaining the customer and his/her assets and backgrounds, and knowing and following the behavior that is characteristic of the customer.

The legal basis for processing means the legal ground on which the controller processes the data subject's data. The lawfulness of processing is described in Article 6 of the EU Data Protection Regulation.

Personal data means any information concerning the data subject or information by which the data subject can be identified

Privacy Notice means a document drawn up in accordance with Articles 13 and 14 of the EU Data Protection Regulation through which the controller informs data subjects of the ways their personal data is processed.

Purpose for processing means the reason why the controller processes the data subject's personal data.

3) WHY DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data in accordance with the processing purposes listed below. In the sections, you will find information on what personal data we process and for what legal basis we process your personal data.

a) Provision of EMI services

Explanation: Personal data is processed to provide EMI services to our customers.

Category of data subjects: Customers.

Categories of personal data: Contact details, payment account information, bank details, and data related to the use of payment services.

Legal basis for processing: According to Section 86 of the Act on Payment Services of Finland (290/2010), the legal basis for processing is consent.

b) Provision of virtual currency services

Explanation: Personal data is processed to provide virtual currency services to our customers.

Category of data subjects: Customers.

Categories of personal data: Contact details, payment account information, bank details, and data related to the use of virtual currency services.

Legal basis for processing: Performance of our contractual obligations with the Customers.

c) KYC (Knowing Your Customer)

Explanation: Personal data is processed to identify and know our customers.

Category of data subjects: Customers.

Categories of personal data: Personal data as required by law, such as personal identification numbers, purposes, and methods of use of the service, ownership relationships, the quality and scope of the business of the customer, and the customer's beneficial owner.

Legal basis for processing: Our statutory obligations under the Act on Preventing Money Laundering and Terrorist Financing of Finland (444/2017).

d) Communications

Explanation: Personal data is processed to carry out communications.

Category of data subjects: People who contact us.

Categories of personal data: Contact details and possibly other data disclosed to us by the data subject. Legal basis for processing: Our legitimate interests, according to which we communicate. Our interests align with those of the people who contact us, as they expect us to process their data for communications purposes.

NB! You may have a right to object to data processing for these purposes (see the section concerning your rights).

4) FROM WHERE DO WE COLLECT YOUR PERSONAL DATA?

We collect your personal data from different sources. The sources of information we use depend on our processing purposes.

a) – b) Provision of our services and c) KYC

We collect your personal data from yourself, our business partners, authorities, and different public sources, such as the trade register.

As customer identification and knowledge is a prerequisites for our business, we utilize personal data about you provided by third parties, such as information provided by identification services and sanction list providers.

d) Communications

We collect your personal data from you.

5) DO WE TRANSFER YOUR PERSONAL DATA?

We may transfer personal data to third parties as a normal course of our business. When personal data is transferred to third parties, we ensure that the transfers are carried out securely and in accordance with adequate data protection agreements.

We may also transfer personal data to third countries. When doing so, we ensure an adequate level of data protection, e.g., by using standard contractual clauses issued by the European Commission and other similar arrangements.

Personal data may be transferred to the following third parties:

- All personal data may be transferred to data storage, and communications services providers
- Data related to the use of our services may be transferred to third parties that provide KYC services to us.
- Accounting-related data may be transferred to financial management services provide

5) USE OF COOKIES

Cookies are small text files, often including unique identifiers, which are sent by web servers to web browsers, and which may then be sent back to the server each time the browser requests a page from the server.

The Company has its own website, and cookies may be obtained in order to provide the Data subject with the full range of Services provided by the Company during website visits, and in order to improve the quality of the Services provided to the Data subject's computer (device). The Company may use the following types of cookies:

- Strictly necessary cookies – these cookies are essential for the browsing of the website and use its features, such as accessing secure areas of the site. These cookies are mandatory and cannot be switched off.
- Functionality cookies – These cookies allow a website to remember choices the Customer has made in the past, like what language they prefer, or what their username and password are, so as to facilitate automatic log-in.
- Google Analytics cookies – These cookies record information such as how many pages a Customer has visited on this website, the traffic source that brought them to the website, and how much time they have spent on the page. This collected information is used to measure, monitor, and improve website performance. No sensitive personal information is collected through Google Analytics. None of this information can be used to identify or contact the Customer. It is all aggregated and, therefore, anonymized. Their sole purpose is to improve website functions. To find out about Google Analytics, click [here](#). However, for Customers who still wish to opt out of Google Analytics cookies, more information can be found [here](#).
- Facebook Marketing cookies – the Company may, from time to time, use Facebook Advertising and Facebook Pixel for re-marketing and tracking purposes. This tool allows the Company to understand and deliver ads, making them more relevant to the Customer. The collected data remains anonymous, and the Company cannot see the personal data of any individual user.

Collected data is saved and processed by Facebook. Facebook may be able to connect the data with Customer's Facebook account and use the data for their own advertising purposes (in accordance with Facebook's Data Use Policy, which can be found [here](#)). Facebook has ultimate control of the information gathered through Facebook

Advertising, and Facebook Pixel Re-Marketing. Customers can opt out of Facebook's use of cookies and Facebook Pixel Re-Marketing through settings on their Facebook Account [here](#).

a) List of cookies used by us currently:

Strictly Necessary Cookies			
Name	Provider	Purpose	Expiry
viewed_cookie_policy	GDPR cookie consent plug-in	To store whether or not the user has consented to the use of cookies. It does not store any personal data.	11 months
cookieLawInfo-checkbox-necessary	GDPR cookie consent plug-in	To store user consent for the cookies in the category "strictly necessary".	11 months
cookieLawInfo-checkbox-non-necessary	GDPR cookie consent plug-in	To store user consent for the cookies in the non-necessary categories.	11 months
PHPSESSID	PHP applications	To store and identify a users' unique session ID for the purpose of managing user sessions on the website. The cookie is a session cookie and is deleted when all the browser windows are closed.	Expires When the browsing session ends.
connectpay.com-cookies-info		To check whether a user accepts cookie Policy or not.	When the browsing session ends.

cookieLawInfo-checkbox-others	GDPR cookie consent plug-in	To store the user consent for the cookies in the category “Other”.	11 months
CookieLawInfoConsent	GDPR cookie consent plug-in	Records the default button state of the corresponding category along with the status of CCPA. It works only in coordination with the primary cookie, viewed_cookie_policy.contains values of both viewed_cookie_policy and cookieLawInfo-checkbox-necessary/cookieLawInfo-checkbox-non-necessary along with CCPA values.	1 year
cookieLawInfo-checkbox-advertisement	GDPR cookie consent plug-in	To record the user consent for the cookies in the category “Advertisement”.	11 months
cookieLawInfo-checkbox-functional	GDPR cookie consent plug-in	To record the user consent for the cookies in the category “Functional”.	11 months
cookieLawInfo-checkbox-performance	GDPR cookie consent plug-in	To store the user consent for the cookies in the category “Performance”.	11 months
cookieLawInfo-checkbox-analytics	GDPR cookie consent plug-in	To store the user consent for the cookies in the category “Analytics”.	11 months

Analytical Cookies			
Name	Provider	Purpose	Expiry
_fbp	Facebook Analytics	To store and track visits across websites.	24 Hours
_ga	Google Analytics	Used to distinguish users.	2 years
_gat	Google Analytics	To throttle the request rate to limit the collection of data on high traffic sites.	1 minute
_gat_gtag_UA_145907203_1	Google Analytics	To store a unique user ID.	1 minute
_gid	Google Analytics	To store information of how visitors use a website and helps in creating an analytics report of how well the website is performing. The data collected includes number of visitors, and where those visitors have originated from.	24 hours
SAPISID	Google	To collect user information for videos hosted by YouTube. An embedded YouTube-video collects visitor information and adjusted preferred settings. Google's tag management system uses this cookie to measure and improve the customer experience.	2 years

APISID	Google	To measure the number and behavior of Google Maps users.	10 year
HSID	Google	Cookies called 'SID' and 'HSID' contain digitally signed and encrypted records of a user's Google Account ID and most recent sign-in time. The combination of these cookies allows Google to block many types of attack, such as attempts to steal the content of forms that a Customer completes on web pages.	1 day or a maximum of 2 years
SID	Google	To authenticate users, prevent fraudulent use of sign-in credentials, and protect user data from unauthorized parties. For example, cookies called 'SID' and 'HSID' contain digitally signed and encrypted records of a user's Google Account ID and most recent sign-in time.	2 years
SIDCC	Google	To protect a user's data from unauthorized access.	2 years
SSID	Google	To collect user information for videos hosted by YouTube.	2 years

SEARCH_SAME SITE	Google	To prevent the browser from sending this cookie along with cross-site requests.	182 days
1P_JAR	Google	To display personalized advertisements on Google sites, based on recent searches and previous interactions.	1 month
NID	Google	To display personalized advertisements on Google sites, based on recent searches and previous interactions.	Session
OTZ	Google	To help customize ads on Google properties, like Google Search.	1 month

Marketing Cookies			
Name	Provider	Purpose	Expiry
fr	Facebook	To deliver, measure and improve the relevancy of ads.	3 months
test_cookie	Advertisement	To determine if the users' browser supports cookies.	15 minutes
IDE,DSID	Google AdWords	One of the main advertising cookies on non-Google sites is named 'IDE' and is stored in browsers under the domain doubleclick.net.	2 years

		Another is stored in google.com and is called 'ANID'.	
__Secure-3PAPISID ,__Secure-3PSID ,__Secure-3PSIDC	Google AdWords	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	2 years
__Secure-3PAPISID ,__Secure-3PSID ,__Secure-3PSIDC	Google AdWords	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	2 years
cb_anonymous_id		AdRoll user related.	1 years
cb_user_id		AdRoll user related.	1 years
cb_group_id		AdRoll user related.	1 years

The Customer has to express their consent or non-consent for the use of cookies. The cookies settings present the Customer with an overview of the cookie categories. The cookies (except for strictly necessary cookies) are used only when the Customer consents to their usage.

c) Delete stored cookies

If at a certain moment you have allowed the use of cookies when visiting our website and now you wish to opt out and delete the cookies collected, please find instructions on how to proceed according to your browser [here](#).

6) HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

The retention period of your personal data depends on the purposes for which we process your personal data. We inspect the necessity of the personal data stored regularly and keep records of the inspections.

a) – b) Provision of our services and c) KYC

We retain the necessary personal data for as long as it is required by law and our industry.

We will retain your customer information for at least five (5) years after the end of your customer relationship, and longer if necessary, e.g. to resolve a criminal case.

We retain data related to transactions and assignments for five (5) years, and the data will be retained by us for five (5) years after the end of the customer relationship.

We retain personal data related to the prevention and combating of money laundering, terrorist financing and fraud for at least five (5) years after the end of the customer relationship.

d) Communications

We will retain the necessary personal data for three (3) years after the contact. We retain social media information until individuals remove their information from our social media channels. Cookies: the retention period depends on each cookie used.

7) WHAT DATA PROTECTION RIGHTS DO YOU HAVE?

You may have the right to use the below listed data protection rights. The contacts concerning the rights shall be submitted to the controller's contact person. Your rights can be put into action only when you have been satisfactorily identified.

You may also have a right to complain to the supervisory authority if you think your data's processing infringes the data protection laws.

Right to inspect

The data subject has a right to inspect what data the controller has stored of him/her.

Right to rectify and erasure

The data subject has a right to request the controller to rectify or erase the personal data concerning the data subject on the grounds provided by law.

Right to restriction of processing

The data subject can request the controller to restrict the processing of the personal data concerning the data subject on the grounds provided by law.

Right to data portability

The data subject shall have a right to receive the personal data concerning him/her, which he/she has provided to the controller, in a structured, commonly used and machine-readable format where the processing is performed automatically and based on consent or a contract.

Right to object

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him/her for such marketing.

Where personal data are processed on the basis of the legitimate interests of the controller, the data subject shall have the right to object the processing of personal data concerning him/her for such purposes in accordance with the law.

Automated individual decision-making, including profiling

The data subject shall have a right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/her.

Right to withdraw consent

Where the legal basis for the processing of personal data is the consent of the data subject, the data subject shall have the right to withdraw his/her consent.

8) CAN THIS PRIVACY NOTICE BE AMENDED?

We may unilaterally amend this privacy notice. We update the privacy notice as necessary, for example, when there is a change in legislation. Amendments to this privacy notice will take effect immediately when we post an updated version on our website.

If we make significant changes to the privacy notice, or if there is a significant change in the way it is used, we will notify the data subjects.

(Last update 12.01.2023)