Privacy Notice

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PayEx Privacy Notice

This is an English translation of the Swedish Privacy Policy for PayEx Sverige AB, found here: https://payex.se/dataskydd/

You should always feel safe when providing your personal data to PayEx. We do everything we can to protect them, prevent unauthorised access, ensure that they are accurate, only process them for the purposes for which the data was collected, and delete them when they no longer need to be retained with regard to the purpose, for security reasons or under other legislation. Below we have gathered all information about how we use your personal data.

General information about the processing

Where relevant and appropriate, details and specific information regarding the processing of personal data may be set out in agreements, on websites and in other documents relating to PayEx services.

PayEx has implemented appropriate technical and organisational measures to protect personal data from unauthorised access, disclosure, loss, alteration, destruction or other unlawful processing.

PayEx uses data processors in certain cases. The data processors engaged may only process personal data in accordance with the purposes and instructions provided by PayEx for the processing. When personal data is to be processed by a data processor, a data processing agreement is entered into.

Other relevant documents

Supplementary information about cookies can be found in our Cookie Policy. Our Cookie Policy aims to inform you about how PayEx Sverige AB uses cookies and similar technologies on our websites. You can find it here: https://payex.se/om-cookies/

If you have entered into an agreement with PayEx, the terms and conditions also contain information about the processing of personal data.

1. Responsibility for your personal data

It is PayEx Sverige AB (”**PayEx**”, "we", "our", "us"), with corporate registration number 556735–5671 and with its registered office in Stockholm, that is the data controller in accordance with the EU General Data Protection Regulation (by the EU General Data Protection Regulation is meant applicable data protection legislation, for example Regulation (EU) 2016/679 and national legislation supplementing the GDPR (**"the Data Protection Regulation" or "GDPR**”)). The data controller is the entity that alone or together with others determines the purposes and means of the processing of personal data.

2. Contact details for PayEx

If you have questions about data protection and the processing of your personal data, you can contact our data protection team, or alternatively our Data Protection Officer, whom you can reach via the contact details below.

PayEx Sverige AB	**PayEx Data Protection Team**	**PayEx Data Protection Officer (”DPO”)**
Kungsgatan 36 111 35 Stockholm	att: Privacy Kungsgatan 36 111 35 Stockholm	att: DPO Kungsgatan 36 111 35 Stockholm
www.payex.se	privacy@payex.com	dpo@payex.com
Complaints: complaint@payex.com	Form for requests etc.: www.payex.se/dataskydd/dsar	
+46(0)8202400		

If you consider that PayEx processing of your personal data infringes your rights and interests under the Data Protection Regulation, you may lodge a complaint with the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten), which is the Swedish supervisory authority and works to protect your personal data.

Supervisory authority in Sweden
Swedish Authority for Privacy Protection (”**IMY**”)
Box 8114 104 20 Stockholm
www.imy.se, imy@imy.se

3. Your rights in relation to your personal data

The Data Protection Regulation gives you the right to control your personal data and PayEx is obliged to inform you about how we process your personal data. If you wish to exercise one of your rights, the easiest way is via our form at www.payex.se/dataskydd/dsar. You can also send an email to privacy@payex.com or contact us via the contact channels set out in section 2 above.

We will respond to your request without undue delay and no later than within one (1) month from the date we received it. If your request is complex or if we have received a large number of requests, we may extend this period by a further two (2) months; in such case we will inform you within the first month of the reason for the extension. If for any reason we are unable to comply with your request, we will notify you of this no later than within one month and inform you of your right to lodge a complaint with IMY and to seek judicial remedy.

Your right to object to direct marketing: You may at any time – free of charge and without stating reasons – object to our processing of your personal data for direct marketing purposes, including profiling linked to such marketing. If you object, we will immediately cease such processing. The easiest way to object is via privacy@payex.com or via the form at www.payex.se/dataskydd/dsar.

Your rights:

- **Right to erasure of your personal data**

The right to have your data erased is also known as the right to be forgotten. This means that you have the right to contact us and request that your data be erased, for example if you withdraw your consent for a processing activity, if the data is no longer needed for the purpose for which it was collected, you have objected to the processing of your personal data and there are no overriding legitimate grounds, or you object to processing for direct marketing purposes.

In certain circumstances we are unable to erase your personal data. This may be the case in situations where there is a legal requirement prescribing that we must retain the data, or the data is still necessary to fulfil the purpose for which it was collected, or the processing is necessary for the establishment, exercise or defence of legal claims. You can read more about the legal requirements that oblige us to retain certain information in section **Error! Reference source not found.**. It may also be the case that PayEx interest in processing the data outweighs your interest in having it erased.

- **Right to rectification**

Data about you that PayEx processes must be accurate and up to date; we have a responsibility to regularly ensure that the data is correct and updated. Under the Data Protection Regulation you have the right to have inaccurate data relating to you rectified. If we hold incomplete information, you may request that we supplement it.

- **Right of access**

You have the right of access, i.e. a right to access your personal data. You can use this right to find out whether we process your personal data. If we process your personal data, you have the right to access them together with information about how we use the data in a so-called "data extract". If a request is manifestly unfounded or excessive, in particular because of its repetitive character, PayEx has the right to charge a reasonable administrative fee or to refuse to comply with the request (Article 12(5) GDPR). PayEx reserves the right to take measures to verify the identity of the person requesting the extract. You can also at any time ask questions about our processing by contacting privacy@payex.com. You also have the right to be informed if something happens to your personal data that may adversely affect you.

- **Right to restriction**

In certain situations you have the right under the Data Protection Regulation to require that the processing of your personal data be restricted. You have the right to require that our processing of your personal data be restricted if you consider that data about you is inaccurate and you have requested rectification of your data. While the matter is being investigated, you may also request that the processing of the personal data in question be restricted. If you have objected to a certain processing activity, you may also have the right to have the processing restricted while we investigate your objection, e.g. if the processing is unlawful and the data subject opposes the erasure of the personal data, or if the data controller no longer needs the personal data for the purposes of the processing but the data subject needs them for the establishment, exercise or defence of legal claims.

- **Right to object**

In certain cases you have the right to object to our processing of your personal data. You can always object to our use of your personal data for direct marketing. You can also object to processing that is based on legitimate interest. You object to the aforementioned processing activities by contacting our Data Protection Team or by filling in the form you can find under section 2 above. For objections in connection with profiling and automated decision-making, see section **Error! Reference source not found.**.

- **Your rights regarding automated decision-making**

In cases where we use automated decisions, you have the right to object to the decision if the decision entails legal effects or constitutes a decision that significantly affects you. In section 5 and section 6 you can read more about how we use automated decisions. In the case of automated decisions, you have the opportunity to contest the decision and to have the decision reviewed by an employee at PayEx. More information about the right to object to automated decisions can be found on the Swedish Authority for Privacy Protection's website www.imy.se.

- **Right to data portability**

If you have consented to providing your personal data to us or if you have provided the data in connection with an agreement between us, you may request to receive the data. This is so that you can transfer the data to another recipient. You have the right to a copy of the data we hold about you and to receive it in a structured, commonly used and machine-readable format. Provided that it is safe and technically feasible, the data may be transferred directly to another data controller.

- **Right to lodge a complaint**

If you have complaints about PayEx processing of your personal data, you can contact us to raise this. You can also contact the Supervisory Authority, which works to protect your personal data. You can read more about how to lodge a complaint with us and the Supervisory Authority in section 2 above.

- **Right to withdraw consent**

If we process your personal data based on your consent, you have the right to withdraw your consent at any time. If you withdraw your consent, we will cease the processing in question. Withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal.

You can withdraw your consent at any time in cases where PayEx uses your personal data with consent as the legal basis. In section 5 you can see for which purposes we process your data with consent as the legal basis. You can withdraw your consent by sending our Data Protection Team an email or via any of the other contact channels that you can find under section 2 above.

If you are a recipient of our newsletters, you can, in addition to the contact channels described in section 2 above, also choose to unsubscribe in received emails.

4. Categories of personal data that we collect and process

Personal data means any information relating to an identified or identifiable natural person, which may range from contact details to financial data, provided that they can be linked to a natural person. Processing of personal data means an operation or a set of operations performed on personal data, such as collection, storage or transfer. Personal data may be collected directly from you, from the stores where you shop, through the use of our services and from external sources, including public or private registers and third parties. Below we describe the categories of personal data that we collect or generate through your use of our services. In section 5 you can read more about what we use the personal data for.

Contact information	Name, telephone number, email address, address, language, country of residence
Identification information	Personal identity number (or equivalent), date of birth, driving licence number, passport number, citizenship, customer number, invoice number, login details/account details, eID solution, photos and photocopies of the data subject or personal data (from identification documents), signature, customer number, invoice number, login information in business portals, powers of attorney and appointments, place of birth, national identity number, PayEx-generated identifiers, qualified electronic signatures
Demographic information	Age
Transaction information (information about payment and purchased goods or services)	Information about purchased goods or services, transaction amount, transactions, bank account number, bank name (for bank payments), account holder's name
Financial information (information about your finances)	Information about income and assets, form of employment, tax residency, information about any loans, credits and credit limits

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Financial history (information about your finances)	Information about payment history for previous loans and credits and any debts, expenditures
Information about the origin of assets and relationships with legal entities	Information about ownership and beneficial owner, payment behaviour, powers of attorney, data enabling PayEx to carry out investigative measures with respect to preventing and combating money laundering and terrorist financing and to ensure compliance with international sanctions, including ascertaining the purpose of the business relationship and whether the Customer is a politically exposed person, as well as data regarding the origin of assets such as information about your transaction partners and business activities
Communication and interaction with PayEx customer service	Email correspondence, recorded calls and chat conversations, when PayEx communicates with you in service-related matters, for example in connection with support, enquiries or complaint handling, during telephone calls, via email or other communication, for example on PayEx social media, support number/case number
Information about the device you use, e.g. mobile, tablet, computer	Device identification, IP address, browser settings, language settings, screen resolution, platform, operating system, time zone, geotags, when visiting PayEx websites, applications or web interfaces, mobile ID (MAID),
Information about your use of PayEx services	How you have used our various services (scope, frequency) and which different features of our services you have used, date and time when you used the service
Professional information	Information such as title/role/position with employer when entering into an agreement with PayEx
Information for regulatory compliance (AML/KYC/sanctions)	Information about whether you are a politically exposed person ("**PEP**"), information related to the prevention of money laundering and terrorist financing, information about whether you appear on any external sanctions lists. Includes information such as name, date of birth, place of birth, profession or position and information about why the person is listed. This information is processed pursuant to the Swedish Anti-Money Laundering Act (lag (2017:630) om åtgärder mot penningtvätt och finansiering av terrorism) and sanctions legislation.

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4.1 Personal data that we collect from other sources

In some situations we obtain personal data about you from sources other than directly from you. This may for example be the case if your claim is handled by PayEx within the framework of our debt collection or financing operations, or we are legally obliged to obtain public information about you. The information in this privacy notice constitutes the information that PayEx provides to you in these situations; however, credit reference agencies may for example inform you when a credit check has been carried out. If you have questions about how and when your personal data was obtained, or if you would like to know more about our processing, you are welcome to contact us via privacy@payex.com.

Source	Types of personal data	Purpose	Legal basis
Credit reference agencies (e.g. UC)	Financial information, payment history, debt information, credit score	Credit assessment	Legal obligation (consumer credits) (GDPR, Article 6(1)(c)). / Legitimate interest (merchants) (GDPR, Article 6(1)(f))
Merchant/store where you made a purchase	Transaction information (goods/services, amount), contact information	Invoicing, receivables management	Contract (GDPR, Article 6(1)(b)).
External sanctions lists and PEP registers (partly public data)	Name, identification data, profession/position	AML/KYC check	Legal obligation (GDPR, Article 6(1)(c)).
Companies within the PayEx and Swedbank groups	Transaction and service usage data	Risk analysis, credit monitoring, reporting	Legitimate interest (GDPR, Article 6(1)(f)) / Legal obligation (GDPR, Article 6(1)(c)).
Public registers (e.g. the Swedish Companies Registration Office (Bolagsverket))	Ownership data, beneficial owner, address	KYC, AML	Legal obligation (GDPR, Article 6(1)(c)).

Debt collection agencies and insolvency administrators (partly public data)	Debt data, payment history	Receivables management, debt collection	Legitimate interest (GDPR, Article 6(1)(f)) / Contract (GDPR, Article 6(1)(b)).

5. What your personal data is used for (purposes) and the legal basis for the processing

Below you will find a summary of the purposes for which we process personal data and the legal basis on which we process your personal data. The table also shows which categories of personal data we process for different purposes and from where personal data is collected. Depending on which PayEx service you use, different processing activities may be relevant; in the column "Purpose of the processing" you can see for which service(s) the processing is carried out.

If a processing activity is based on a balancing of interests, you can always contact us if you wish to receive more information about the assessment we have made; the easiest way to do so is by sending a message to our Data Protection Team, see section 2 above.

Purpose of the processing	Category of personal data processed and from where it is collected	**Legal basis for the processing under the GDPR**	**When our purpose for processing the personal data ceases**	**Sharing of personal data with external parties (see section 8 below for more information)**
Enter into, deliver and administer our customer relationship with you for the service(s) you use. This includes creating and sending information to you in electronic or physical format (not marketing).	Personal data collected from you: • Contact information • Identification information • Transaction information (payment information) • Financial information • Financial history • Information about your use of PayEx services • Device information. (Your device)	The processing is necessary for taking steps at your request prior to, and for the performance of, an agreement between you and PayEx, (GDPR, Article 6(1)(b)). Transaction information is processed in accordance with applicable legal requirements and	When the agreement between you and PayEx terminates or when the transaction has been completed and the transaction data is no longer necessary to process due to a legal obligation.	Information about the purchase status is shared with the store where you made the purchase When purchasing via our services, personal data may be shared with other payment service providers depending on how you have chosen to pay.

The processing of personal data takes place regardless of which of our services you have.	Personal data collected from other sources: • From the store where you made a purchase: Transaction information (information about goods/services) • Information about your finances. (PayEx and credit reference agencies) • From PayEx: Information about your use of our services • From your device: Information about the device you use, e.g. mobile, tablet, computer	the processing is necessary for compliance with a legal obligation, (GDPR, Article 6(1)(c)).		
Verify and authenticate your identity as a representative of a merchant and that you are who you claim to be by means of electronic identification or username and password. The processing of personal data is carried out, among other things, to protect your and other customers' information and takes place in the following situations:	Personal data collected from you: • Contact information • Identification information • Information about the device you use, e.g. mobile, tablet, computer The collection is made in connection with entering into an agreement with PayEx, when contact persons who are to be able to log in to portals are specified, and upon login to portals.	The processing is based on a legal obligation, (GDPR, Article 6(1)(c)). PayEx is required by law to establish the identity of our customers and to know our customer. When entering into or administering an agreement, the processing is necessary for PayEx to be able to perform the agreement with you (Article 6(1)(b) GDPR).	When you have verified your identity and when individual administration access is changed/deleted or revoked by the merchant.	During identification, collected data is processed by an external provider of the identification application. No further sharing takes place.

When you identify yourself to log in to our portals for merchants with whom we have agreements.				
Verify and authenticate your identity as an end customer and that you are who you claim to be by means of electronic identification. The processing of personal data is carried out, among other things, to protect your and other customers' information and takes place in the following situations: i) During identification in connection with payment of an invoice or when entering into an agreement with PayEx. ii) When you identify yourself to log in to one of our customer portals.	Personal data collected from you: • Identification information • Device information The collection takes place when you log in to one of our portals, or when you are in contact with our customer service and need to verify your identity.	The processing is based on a legal obligation. (GDPR, Article 6(1)(c)). PayEx is required by law to establish the identity of our customers and to know our customer. When entering into an agreement, the processing is necessary for PayEx to be able to perform the agreement with you (Article 6(1)(b) GDPR).	When you have verified your identity.	During identification, collected data is processed by an external provider of the identification application. No further sharing takes place.

iii) When you sign (with electronic identification) an application, document or other form of electronic document.				
Carry out credit assessments on merchants/stores before entering into an agreement. Credit assessment involves profiling of your ability to pay and automated decision-making. The processing of personal data takes place if you apply for any services and we have reason to assess your creditworthiness due to business risk	Personal data collected from you: • Contact information • Identification information Personal data collected from other sources: • From credit reference agencies • From PayEx: Financial information, financial history (information about your finances) • From PayEx: Information about your use of our services	The processing is based on a balancing of interests. (GDPR, Article 6(1)(f)). In the balancing of interests, PayEx has assessed that we have a legitimate interest in minimising credit risk and ensuring that credit is granted to counterparties with the ability to pay, and that the processing of personal data is necessary to achieve our purpose and that our interest outweighs your right not to have your data processed for this purpose. You can request a copy of our legitimate interest assessment (LIA) via privacy@payex.com. More information about profiling can be found in section 6.	An approved credit assessment is retained for as long as a credit relationship is ongoing and is deleted one (1) year after the end of the business relationship. A declined credit assessment is retained for three months after it was carried out in cases where no active business relationship exists. In cases where an active business relationship exists, all credit assessment documentation is retained for as long as the business relationship is ongoing and is deleted one (1) year after the business relationship.	During credit assessment, information is shared with the credit reference agency in order to identify you

To carry out customer surveys via email, SMS or telephone. The processing of personal data may take place regardless of which of our services you have and aims to maintain, develop and improve PayEx operations, the services, the customer's user experience, increase customer satisfaction and customer loyalty and strengthen the PayEx brand through surveys, analyses and statistics.	Personal data collected from you: • Contact information • Identification information • Information about your use of PayEx services	The processing is based on a balancing of interests, (GDPR, Article 6(1)(f)). In the balancing of interests, PayEx has assessed that we have a legitimate interest in producing statistics and carrying out customer surveys and market analyses for the purpose of maintaining, developing and improving our services and customer experience, and that the processing of personal data is necessary to achieve these purposes and that our interest outweighs your right not to have your data processed for this purpose. You can request a copy of our legitimate interest assessment (LIA) via privacy@payex.com.	May take place for as long as you are a customer of PayEx.	Collected data is processed by an external provider of customer survey software.
To carry out market analyses for the purpose of creating payment statistics and analysis of the payment market. The processing of personal data may take place regardless of which of our services you have.	Personal data collected from you: • Contact information • Transaction information • Information about your use of our services	The processing is based on a balancing of interests. (GDPR, Article 6(1)(f)). In the balancing of interests, PayEx has assessed that we have a legitimate interest in producing statistics and carrying out customer surveys and market analyses and that the processing of personal	May take place for as long as you are a customer of PayEx. Please note that before analysis, for the purpose of producing statistics, we pseudonymise the personal data.	The anonymised statistics are shared with other companies within the Swedbank group.

Compiled statistics are anonymised.		data is necessary to achieve our purpose and that our interest outweighs your right not to have your data processed for this purpose.		
Inform you about our offers and services through newsletter subscription. The processing of personal data may take place regardless of which of our services you have.	Personal data collected from you: • Contact information	The processing is based on your consent, (GDPR, Article 6(1)(a)). Read more in section **Error! Reference source not found.** about how you can withdraw your consent.	When you unsubscribe from the newsletter or inform us that you do not want your data to be processed for this purpose.	Collected data is processed by an external provider of customer survey and marketing software.
Handle customer service cases and customer support cases. This includes summarising telephone calls in writing, chat conversations and documenting cases and what you and PayEx have agreed upon. To identify you as a customer and that you are who you claim to be.	Personal data collected from you: • Contact information • Identification information • Information about your use of our services	Performance of contract in cases where you have one with PayEx, (GDPR, Article 6(1)(b)). The processing is based on a legal obligation, (GDPR, Article 6(1)(c)). PayEx is required by law to establish the identity of our customers and to know our customer. If you do not have an agreement with PayEx, the processing is	Up to eighteen (18) months after your case is closed, depending on which of our services the case concerned. When you have verified your identity.	Collected data is processed by external providers of customer service telephony, chat and case management software.

The processing of personal data may take place regardless of which of our services you have, or if you do not have a service, if you contact our customer service.		based on a balancing of interests, (GDPR, Article 6(1)(f)). PayEx has assessed that we have a legitimate interest in handling cases and enquiries from persons who do not have an agreement with PayEx. The processing this entails is necessary to achieve the purpose of the processing, and our interest outweighs your right not to have your data processed for this purpose. It is also in your interest to receive support and assistance on various matters.		
Recording of calls for training of our customer service staff and quality improvement purposes. The processing of personal data may take place if you call our customer service and may, during the period the recording is retained, be used for analysis and training of our customer service staff.	Personal data collected from you: • Contact information • Information about your use of our services	The processing is carried out on the basis of a balancing of interests, (GDPR, Article 6(1)(f)). PayEx has assessed that we have a legitimate interest in recording calls for training and quality improvement purposes in order to improve and quality-assure customer service. The processing this entails is necessary to achieve the purpose of the processing, and our interest outweighs your right not to have your data processed for this purpose. You can request a copy of our legitimate interest	Recorded calls are retained for ninety (90) days from the date the recording was made.	Collected data is processed by an external provider of customer service telephony software.

		assessment (LIA) via privacy@payex.com. During a telephone call you are given the opportunity to decline the recording of the call (by pressing a button on your phone).		
Use of digital AI assistance for incoming telephone calls. The processing of personal data may take place if you provide such data during a call with the PayEx VoiceBot. The call is saved as a transcription. If you do not provide any personal data, we have no reasonable means of linking the transcription to you as a person.	Personal data collected from you: • The data that you provide during a call with our AI-assisted telephone service.	The processing is carried out on the basis of a balancing of interests, (GDPR, Article 6(1)(f)). PayEx has assessed that we have a legitimate interest in transcribing and saving a transcription of the call for training and quality improvement purposes. The processing this entails is necessary to achieve the purpose of the processing, and our interest outweighs your right not to have your data processed for this purpose.	The transcription is retained for fourteen (14) days from the date the call took place.	No further sharing takes place.
Ensure security and information security in our technical systems and IT infrastructure.	Personal data collected from you: • Contact information • Identification information • Information about the device you use, e.g. mobile, tablet, computer	The processing is based on a balancing of interests, (GDPR, Article 6(1)(f)). PayEx has assessed that we have a legitimate interest in ensuring	Processing continues for the duration of your use of a service or your attempt to gain access to PayEx information assets.	No further sharing takes place.

The processing of personal data may take place regardless of which of our services you have or if you attempt to gain access to PayEx information assets.	• your use of our services	security and information security in our services. We have further assessed that the processing this entails, in order to protect your and other customers' information, is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to have your data processed for this purpose. That we offer secure services is also in your interest as a customer of PayEx.		
Analyse customer and visitor behaviour via cookies (about how you use our products and services) for the purpose of improving user experience and our products and services (necessary cookies) Read more on our Cookie Policy page. The processing of personal data may take place regardless of which of our services you have.	Personal data collected from you: • Information about the device you use, e.g. mobile, tablet, computer	The processing is based on a balancing of interests, (GDPR, Article 6(1)(f)). PayEx has assessed that we have a legitimate interest in processing your personal data for the purpose of providing a functioning website. We have further assessed that the processing this entails is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to have your data processed for this purpose.	Read more on our Cookie Policy page.	No further sharing takes place.

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Analyse customer and visitor behaviour via cookies (about how you use our products and services) for the purpose of improving user experience and our products and services (functional cookies), and to follow up on marketing activities on social media and search engines (analytics and marketing cookies). Read more on our Cookie Policy page. The processing of personal data may take place regardless of which of our services you have.	Personal data collected from you: • Information about the device you use, e.g. mobile, tablet, computer Personal data collected from other sources: • Contact details, if available, from the service where we have marketed ourselves.	The processing is based on your consent, (GDPR, Article 6(1)(a)). Read more on our Cookie Policy page about how to withdraw your consent.	Read more on our Cookie Policy page	No further sharing takes place.
Process credit assessment information for the purpose of monitoring our credit exposure. To protect your identity, we pseudonymise personal data before it is used in the analysis of credit exposure.	Personal data collected from you: • Contact information • Identification information • Financial information • Financial history Personal data collected from other sources:	The processing is based on a legal obligation, (GDPR, Article 6(1)(c)), pursuant to the Swedish Banking and Financing Business Act (lag (2004:297) om bank- och finansieringsrörelse).	Credit reports and compilation of credit exposure are retained in accordance with law.	An overall picture of our credit exposure is shared with other companies within the Swedbank group, in order to fulfil regulatory requirements on the credit granting process within the group.

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	• From credit reference agencies and PayEx: Financial information, financial history (information about your finances) • From PayEx companies: Information about your use of our services			
Carry out credit assessments before credit is granted/extended and carry out credit assessments during an ongoing credit relationship. Credit assessment involves profiling of your ability to pay and automated decision-making. Credit assessment takes place if you apply for any of our credit accounts or choose a BNPL (Buy Now Pay Later) product.	Personal data collected from you: • Contact information • Identification information • Financial information • Financial history Personal data collected from other sources: • From credit reference agencies and PayEx companies: Financial information, financial history (information about your finances) • From PayEx companies: Information about your use of our services	The processing is based on legal obligations, (GDPR, Article 6(1)(c)), which are found in the Swedish Banking and Financing Business Act (lag (2004:297) om bank- och finansieringsrörelse) and the Swedish Consumer Credit Act (konsumentkreditlagen (2010:1846)), which prescribe that PayEx has an obligation to assess whether you have the financial capacity to fulfil obligations under a credit agreement. More information about profiling and automated decision-making can be found in section **Error! Reference source not found.**.	An approved credit assessment is retained for one (1) year after the credit has been repaid. A declined credit assessment is retained for three (3) months after it was carried out in cases where no active credit relationship exists; otherwise, credit assessment documentation is retained during the credit relationship and deleted one (1) year after the end of the customer relationship.	During credit assessment, information is shared with the credit reference agency in order to identify you. See also section 7 on our use of credit reference agencies with which your data may be shared.

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Carry out credit assessments prior to decisions on legal measures within the framework of debt collection operations.	Personal data collected from you: • Contact information • Identification information Personal data collected from other sources: • From credit reference agencies and PayEx companies: Financial information, financial history (information about your finances)	The processing is based on a legal obligation, (GDPR, Article 6(1)(c)), namely the Swedish Debt Collection Act (inkassolagen (1974:182)) and the Swedish Financial Supervisory Authority's (Finansinspektionens) Regulations and General Guidelines on Debt Collection etc.	Credit assessment information is retained for as long as it is deemed relevant for completed or forthcoming debt collection measures, but no longer than one (1) year after the end of the customer relationship.	During credit assessment, information is shared with the credit reference agency in order to identify you
Prevent PayEx from being used for money laundering or terrorist financing, check whether a customer is subject to economic sanctions and check whether a customer is a politically exposed person, and to carry out risk analysis and risk assessment. The processing involves profiling, but without automated decisions on money laundering risk.	Personal data collected from you: • Contact information • Identification information • Professional information (title) • Information about the origin of assets and relationships with legal entities (Information about ownership and beneficial owner) • Information for regulatory compliance (AML/KYC/sanctions) - Information about whether you are a politically exposed person ("**PEP**")	The processing is based on a legal obligation, (GDPR, Article 6(1)(c)). PayEx is required under the Swedish Anti-Money Laundering Act (lag (2017:630) om åtgärder mot penningtvätt och finansiering av terrorism) to establish the identity of our customers and achieve customer due diligence and to take measures to prevent money laundering etc. More information about profiling and automated decision-making	The processing continues for as long as you use any of PayEx services. We carry out ongoing risk assessments for this purpose for as long as you are a customer of PayEx. The data is thereafter processed for up to five (5) years after the end of the customer relationship or ten (10) years if the data is necessary to prevent, detect or investigate money	The information may be shared with authorities in the event of suspected crime

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In the follow-up of customer due diligence where data has not changed, automated decisions may occur; in such cases you always have the right to have an automated decision reviewed by a natural person at PayEx. The processing of personal data applies if you are a business customer who has one or more of the Business-to-Business services that PayEx offers the market or are an owner or representative of such a company. For private individuals, the processing only applies if you have a direct agreement with PayEx where PayEx is the creditor and you are the borrower.	• Information about the origin of assets and relationships with legal entities Personal data collected from other sources: • Information for regulatory compliance (AML/KYC/sanctions) - information related to the prevention of money laundering and terrorist financing. • information about whether you appear on any external sanctions lists. • From credit reference agencies and PayEx companies: Financial information, financial history (information about your finances)	can be found in section **Error! Reference source not found.**.	laundering or terrorist financing.	
Prevent PayEx from being used for money laundering or terrorist financing, by monitoring and reviewing transactions (transaction	Personal data collected from you: • Contact information • Identification information • Transaction information	The processing is based on a legal obligation, (GDPR, Article 6(1)(c)) pursuant to the Swedish Anti-Money Laundering Act (lag	Up to five (5) years from the termination of the agreement, the time of the transaction or after the end of the customer	Information may be shared with authorities in the event of suspected crime.

monitoring) and carrying out risk assessments. The processing involves profiling but any decisions on money laundering risk are not automated.	Personal data collected from other sources: • From the store where you made a purchase: Transaction information (information about goods/services) From your device: • Information about the device you use From PayEx companies: • Information for regulatory compliance (AML/KYC/sanctions): calculation data on the probability of fraud, information related to the prevention of money laundering and terrorist financing Information from third parties: • Information related to the prevention of money laundering and terrorist financing. • Information about whether you appear on any external sanctions lists.	(2017:630) om åtgärder mot penningtvätt och finansiering av terrorism). More information about profiling and automated decision-making can be found in section **Error! Reference source not found.**.	relationship, or ten (10) years if the data is necessary to prevent, detect or investigate money laundering or terrorist financing.	

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Establish and defend PayEx legal claims. The processing of personal data may take place regardless of which of our services you have.	All categories of information set out in section **Error! Reference source not found.**. Where necessary to safeguard our rights in a dispute, we may also collect other categories of personal data.	The processing is based on a balancing of interests, (GDPR, Article 6(1)(f)). PayEx has assessed that we have a legitimate interest in establishing and defending PayEx legal claims, that the processing of personal data is necessary to achieve our purpose and that our interest outweighs your right not to have your data processed for this purpose. You can request a copy of our legitimate interest assessment (LIA) via privacy@payex.com.	Processing continues for up to ten (10) years from a limitation-interrupting measure or is concluded by a final judgment, settlement or limitation.	• Information regarding the case may be shared with companies within the PayEx group and the Swedbank group • Authorities (courts)
Analyse and improve our risk and credit models. Compiled statistics are anonymised. The processing of personal data takes place if you have purchased against invoice or if you have applied for any of our credit account services.	Personal data collected from you: • Identification information • Contact information • Financial information • Financial history Personal data collected from other sources: • From PayEx companies: Information about your use of our services • From store: Transaction information (information about	The processing is based on a balancing of interests, (GDPR, Article 6(1)(f)). PayEx has assessed that we have a legitimate interest in improving and further developing our risk and credit models to ensure responsible credit granting, and that we also pseudonymise your personal data in doing so. We have assessed that the processing this entails is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to	The processing continues for as long as you have a credit debt with PayEx.	No further sharing takes place

	payment and purchased goods or services)	have your data processed for this purpose. You can request a copy of our legitimate interest assessment (LIA) via privacy@payex.com.		
PayEx acquisition of claims for payment (receivables) for purchases made from our customers (stores). The processing of personal data may take place if you have purchased something against invoice or credit at a store.	Personal data collected from you: • Identification information • Contact information Personal data collected from other sources: • From store: Transaction information (information about payment and purchased goods or services)	The processing is based on a balancing of interests, (GDPR, Article 6(1)(f)). PayEx has assessed that we have a legitimate interest in processing your personal data in connection with PayEx acquiring the receivable (purchasing your outstanding debt to the store). Furthermore, we have assessed that the processing this entails is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to have your data processed for this purpose. You can request a copy of our legitimate interest assessment (LIA) via privacy@payex.com.	When the purchase has been completed.	Information about completed purchases is shared with our customer (store) where you made the purchase.
PayEx repurchase claims (repurchase of acquired receivables) for purchases	Personal data collected from you: • Identification information • Contact information	The processing is based on a balancing of interests, (GDPR, Article 6(1)(f)).	Upon completed repurchase.	Information about completed purchases is

you have made at stores affiliated with us. The processing of personal data may take place upon repurchase of a receivable arising from your purchase of something against invoice or account credit at a store.	Personal data collected from other sources: • From store: Transaction information (information about payment and purchased goods or services)	PayEx has assessed that we have a legitimate interest in the store repurchasing the receivable (purchasing your outstanding debt to PayEx). Furthermore, we have assessed that the processing this entails is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to have your data processed for this purpose.		shared with the store where you made the purchase.
Carry out fraud checks before a purchase is approved. The processing involves profiling and automated decision-making. The processing of personal data may take place if you choose to pay with one of our payment methods that involves acquisition of receivables or credit.	Personal data collected from you: • Contact information • Identification information • Transaction information (payment information, information about goods/services) • Financial information Personal data collected from other sources: • From the store where you made a purchase: Transaction information (information about goods/services) • From PayEx companies: Information about your use of our services	The processing is based on a legal obligation, (GDPR, Article 6(1)(c)) pursuant to The processing is necessary for PayEx to be able to enter into and perform the agreement with you (Article 6(1)(b) GDPR). For our financial services we are legally obliged to establish the identity of our customers (Article 6(1)(c) GDPR). (Swedish Anti-Money Laundering Act (2017:630)lag (om åtgärder mot penningtvätt och finansiering av terrorism))	After completed analysis of fraud risk, a denied purchase due to suspected fraud is retained in accordance with applicable legal requirements and authority instructions. If PayEx has identified a possible risk in the use of PayEx services, PayEx will continue to use your data for this purpose and, among other things, carry out a risk assessment of whether a risk of fraud exists. This processing	Information may be shared with authorities in the event of suspected crime

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	• From your device: Information about the device you use		continues for as long as PayEx is legally obliged to retain the data	
Prepare accounting and bookkeeping in accordance with accounting legislation and retain such records in accordance with applicable law. The processing of personal data may take place regardless of which of our services you have.	Personal data collected from you: • Contact information • Identification information • Transaction information (payment information, information about goods/services) Personal data collected from other sources: • From the store where you made a purchase: Transaction information (information about goods/services)	The processing is based on a legal obligation, (GDPR, Article 6(1)(c)), pursuant to the Swedish Bookkeeping Act (bokföringslagen (1999:1078))	During the time the accounting is compiled and seven (7) years after the end of the year in which the data was recorded.	Compiled accounting is shared with companies within the Swedbank group Compiled accounting is also shared with authorities.
Preparation and negotiation and sale of PayEx receivables to a potential buyer. The processing of personal data may take place if you purchase against invoice where PayEx is the receivables owner or if you have any of our account credit services.	Personal data collected from you: • Contact information • Identification information • Transaction information (payment information, information about goods/services) Personal data collected from other sources: • From the store where you made a purchase: Transaction	The processing is based on a balancing of interests, (GDPR, Article 6(1)(f)). PayEx has assessed that we have a legitimate interest in being able to sell receivables when needed, that it is necessary to process your personal data to achieve the purpose and that our interest outweighs your right not to have your data processed for this purpose. You can request a copy	The processing may be carried out for as long as there is an unpaid receivable.	The information may be shared with other debt collection companies and potential acquirers prior to the sale of receivables

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	information (information about goods/services)	of our legitimate interest assessment (LIA) via privacy@payex.com.		
Conduct debt collection operations, collect overdue debts and handle instalment plans or payment deferrals. The processing of personal data takes place if you have an overdue debt to PayEx or when PayEx conducts debt collection operations on behalf of another company.	Personal data collected from you: • Contact information • Identification information • Transaction information (payment information, information about goods/services) • Financial information Personal data collected from other sources: • From the store where you made a purchase: Transaction information (information about goods/services) • From credit reference agencies and PayEx: Financial information, financial history (information about your finances) • From PayEx: Information about your use of our services Communication and interaction with PayEx customer service	The processing is based on a balancing of interests, (GDPR, Article 6(1)(f)). PayEx has assessed that we have a legitimate interest in collecting lawful, overdue receivables, both on our own behalf and on behalf of the principals (creditors). You can request a copy of our legitimate interest assessment (LIA) via privacy@payex.com. Necessity: The processing of the debtor's personal data is necessary to be able to conduct debt collection operations – without the processing, the receivables cannot be collected. Balancing of interests: Since debt collection is a legally regulated and socially accepted activity requiring a special licence (debt collection licence under the Swedish Debt Collection Act (inkassolagen (1974:182))), the	When the debt has been settled.	• Other debt collection companies if sale of the debt becomes relevant, see above. • Authorities • Credit reference agencies • Other debt collection companies, in international debt collection cases

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		legitimate interest outweighs the data subjects' opposing interests, provided that the processing is carried out in accordance with the requirements of the Debt Collection Act (e.g. good debt collection practice).		
Respond to questions and communicate with you via social media (e.g. Facebook or LinkedIn). The processing of personal data takes place if you contact us via social media.	Personal data collected from you: • Contact information • Communication and interaction with PayEx customer service Personal data collected from other sources: • social media (e.g. Facebook or LinkedIn).	The processing is based on a balancing of interests, (GDPR, Article 6(1)(f)). PayEx has assessed that we have a legitimate interest in having a presence on selected social media to offer alternative contact channels to our customer service. We have assessed that the processing this entails is necessary to achieve the purpose of the processing and that our interest outweighs your right not to have your data processed for this purpose. When communicating via social media, your personal data is also processed by the social media companies in accordance with their respective privacy notices.	When your question has been answered/our communication has ended.	The information is shared via the social media company where the communication with PayEx was initiated.

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Compile your information about your purchase for the purpose of presenting transaction-related information to end customers in our portals.	The collection is made in connection with your use of our services and, for example, when you carry out payment transactions. Personal data collected from you: • Transaction information (payment information) • Identification information • Contact information	The processing is based on a balancing of interests, (GDPR, Article 6(1)(f)). In the balancing of interests, PayEx has assessed that we have a legitimate interest in collecting and presenting transaction-related information to you and that our interest outweighs your right not to have your data processed for this purpose.	May take place for as long as you are a customer of PayEx or for as long as PayEx manages a receivable for which you are liable for payment.	When you use PayEx services, e.g. Invoice or Instalment Account, information *about completed purchases may be shared with a Payment Service Provider* ("**PSP**") in cases where you have initiated a payment through a PSP.
Retain data due to legal requirements. Due to legal requirements, such as the Bookkeeping Act (bokföringslagen) and anti-money laundering legislation (penningtvättslagen), PayEx needs to retain data even after the end of the customer relationship. Such circumstances may include: fulfilling our reporting obligations to authorities, for example the Swedish Tax Agency (Skatteverket), the	All categories of information listed in section **Error! Reference source not found.** that are relevant to the legal obligation in question.	The processing is based on a legal obligation, (GDPR, Article 6(1)(c)) pursuant to the Swedish Debt Collection Act (inkassolagen (1974:182)), the Swedish Bookkeeping Act (bokföringslagen (1999:1078)), the Swedish Banking and Financing Business Act (lag (2004:297) om bank- och finansieringsrörelse), the Swedish Consumer Credit Act (konsumentkreditlagen (2010:1846)), the Swedish Payment Services Act (lagen (2010:751) om betaltjänster).	The time period varies depending on applicable law. See more information in section **Error! Reference source not found.**. PayEx will not process personal data for longer than necessary for the purposes for which the personal data was collected and only in accordance with retention rules in law and other regulations. For example, when the contractual relationship has ended, PayEx will retain personal	PayEx may disclose your personal data to authorities to comply with law or other regulations relating to, for example, taxes, combating money laundering and terrorist financing.

Swedish Police Authority (Polismyndigheten), the Swedish Financial Supervisory Authority (Finansinspektionen) and other supervisory authorities, handling incidents, handling complaints, including retaining information for this purpose, fulfilling rules and requirements in legislation regarding accounting and auditing			data for accounting purposes and for purposes related to preventing money laundering. This means that PayEx often has a legal obligation to retain data for longer than is necessary to fulfil the agreement with you.	
Processing of personal data for power of attorney When a private individual or representative of a business registers a power of attorney issued in relation to PayEx, the data is stored by PayEx in accordance with the information in the power of attorney.	Personal data collected from you: • Name and personal identity number of the grantor/agent • Administrative data such as date and registering company.	The processing is necessary to perform the assignment to which the power of attorney relates (GDPR, Article 6(1)(b)). Both you as the grantor and you as the agent provide your data in connection with the power of attorney being registered with PayEx. The processing is necessary for PayEx to be able to perform the assignment that the power of attorney gives us. The data is processed during the validity period of the power of attorney and thereafter in accordance with applicable limitation periods.	The data is retained for twelve (12) months after the power of attorney has been terminated for traceability and security reasons.	PayEx engages external technology providers to provide registers and databases that process your personal data. PayEx ensures that these providers take sufficient protective measures to handle your personal data in a secure manner.

Assignment of a creditor's claim for payment for your purchase to PayEx (so-called factoring).	Personal data collected from the assignor: • Contact information • Identification information • Financial information (information about your finances) • Financial history (information about your finances) • Transaction information (information about payment and purchased goods or services) • Device information (your device)	The processing is based on a balancing of interests, (GDPR, Article 6(1)(f)). In the balancing of interests, PayEx has assessed that we have a legitimate interest in purchasing and selling your outstanding debt. We ensure that the processing is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to have your data processed for this purpose.	Data on purchased receivables is retained in accordance with accounting rules.	Creditor
To carry out calculations in accordance with rules on capital adequacy requirements.	• Contact information • Identification information • Financial information (information about your finances) • Financial history (information about your finances) • Transaction information (information about payment and purchased goods or services)	Compliance with law (GDPR, Article 6(1)(c)). (Capital Requirements Regulation 575/2013, and Capital Requirements Directive 2013/36)	Seven (7) years after the end of the year in which the data was recorded.	PayEx may disclose your personal data to authorities to comply with law or other regulations and to the Swedbank group.

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Within the framework of improving PayEx services and products and analysing financial data, PayEx anonymises your personal data. To carry out data analyses for product development and product testing to improve our risk, fraud and credit models and for the design and development of our services.	• Contact information • Identification information • Financial information (information about your finances) • Financial history (information about your finances) • Transaction information (information about payment and purchased goods or services)	The processing is based on a balancing of interests (Article 6(1)(f) GDPR). In the balancing of interests, PayEx has assessed that we have a legitimate interest in anonymising your personal data for product development purposes and in analysing customer behaviour for the purpose of improving the service and financial data, and that our interest outweighs your right not to have your data processed for this purpose.	Occurs throughout the entire period that PayEx must retain the data in its systems, for example to fulfil the agreement with you or to comply with applicable law.	PayEx engages external technology providers to provide registers and databases that process your personal data. PayEx ensures that these providers take sufficient protective measures to handle your personal data in a secure manner.
To provide savings and payment accounts	• Contact information • Identification information • Financial information (information about your finances) • Financial history (information about your finances) • Transaction information (payment information)	The processing is necessary for PayEx to be able to perform the agreement with you (Article 6(1)(b) GDPR).	During the term of the agreement and thereafter seven years for accounting purposes.	PayEx may disclose your personal data to authorities to comply with law or other regulations, e.g. the Swedish Tax Agency (Skatteverket) with regard to interest.
Visitor registration To administer and carry out visits at PayEx Sweden's offices, visitors' personal data is registered in our visitor management system	• Personal data collected from you: • Contact information • Personal data collected from other sources: • From your host at PayEx: name and email address	The processing is based on a balancing of interests (GDPR, Article 6(1)(f)). PayEx has assessed that we have a legitimate interest in ensuring the safety of employees and visitors, maintaining access control, ensuring that all persons	The data is retained for 90 days in the main system. Notification data is anonymised within 12 hours after the meeting has ended and evacuation data is deleted upon	The data is shared with our data processor EastCoast Solutions AB (Precise Visit), with whom a data processing agreement based on the EU Standard Contractual Clauses has

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(Precise Visit). The processing takes place regardless of whether you are a customer, supplier, consultant or other external visitor.	•	on the premises can be located in an emergency such as a fire, and protecting confidential information in accordance with the Banking Act. The data processed is limited to the absolute minimum required for a specific visit, the processing is an established and expected practice in a regulated financial business, and the consequences for the data subject are assessed as low. Our assessment is that these interests outweigh the data subject's opposing interest. You may object to the processing at any time by contacting us at privacy@payex.com or via our web form.	check-out, or automatically each night.	been entered into. All data is stored within the EU/EEA and no personal data is transferred to countries outside the EU/EEA.

Regarding purposes for data that we collect from sources other than yourself, please see section 4.1 above.

6. Profiling and automated decisions

Profiling means any form of automated processing of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects such as a natural person's economic situation, health, personal preferences, interests, reliability and behaviour

For certain purposes we use profiling of you as a customer. Profiling is an automated processing of personal data that involves using personal data to assess certain personal characteristics about you. Automated decision-making may be linked to profiling, which means that an algorithm, based on the result of the profiling, makes a decision without involvement from any of our employees.

You have the right to be exempted from, contest, express views about or review decisions based solely on automated processing, including profiling, if these decisions have legal or similar consequences for you. You can contact our Data Protection Team in accordance with section 2 above, who will ensure a manual review of the decision. We may also take supplementary information into account if you provide us with such information.

Profiling is used in credit profiling, transaction monitoring, fraud and anti-money laundering checks, see section 5 and below. Of these processing activities, credit assessment, customer due diligence follow-up, execution of transactions and transaction monitoring to combat fraud also include elements of automated decision-making. Your rights in connection with automated decision-making can be found in section 3.

Credit profiling

Profiling and automated decisions that may significantly affect you, equivalent to legal consequences, are credit profiling and automated decisions on whether credit should be granted or not. Credit profiling refers to automated processing of personal data used to assess future ability to pay and to analyse or predict an economic situation. Decisions may mean that your credit application is approved or not approved, that the credit limit is set at a certain level, or that a revolving credit is restricted or closed. The most important factors that the system considers are: (i) your payment history (previous loans, credits and debts with PayEx and other creditors), (ii) your current income, debts and financial obligations (obtained from you and from credit reference agencies), (iii) credit reference information from external credit reference agencies (e.g. UC), (iv) transaction patterns and possible behavioural data from your use of our services, and (v) PayEx internal risk policy and established credit risk levels. We carry out credit profiling and automated credit decisions if you apply for a service that involves credit.

Transaction monitoring

We carry out transaction monitoring to combat fraud or money laundering and terrorist financing. We profile and make automated decisions based on your user behaviour and compare it with behaviours and circumstances that indicate different levels of risk. The most important factors that the system considers are: (i) transaction patterns and deviations from your normal behaviour, (ii) the size, frequency and counterparty of transactions, and (iii) comparison against known risk profiles and patterns. Under the Swedish Anti-Money Laundering Act (lag (2017:630) om åtgärder mot penningtvätt och finansiering av terrorism), information about all circumstances that, following assessment of suspected activities or transactions, may indicate money laundering or terrorist financing must be reported to the Financial Intelligence Unit (Finanspolisen).

Fraud check

Profiling and decisions aimed at preventing fraud take place in connection with card payments and purchases against invoice. Your behaviour is profiled to identify possible fraudulent behaviour by comparison with your previous use of our services. Profiling is carried out based on information that we collect from you, our internal information and card number data from external sanctions lists. The most important factors that the system considers are: (i) deviation from your historical purchasing behaviour, (ii) geographical deviations, and (iii) the presence of card numbers or identification data on sanctions lists. If suspicion of fraud exists after further analysis, data may be disclosed to the Financial Intelligence Unit (Finanspolisen) or the Swedish Prosecution Authority (Åklagarmyndigheten) pursuant to the Swedish Payment Services Act (lagen (2010:751) om betaltjänster).

Anti-money laundering check

Profiling and decisions aimed at preventing money laundering. Your behaviour is profiled to identify possible money laundering. The most important factors that the system considers are: (i) the structure and origin of transactions, (ii) presence on sanctions lists or PEP registers, and (iii) deviating patterns in relation to declared business relationships. Profiling is carried out based on information that we collect from you and our internal information.

Customer due diligence follow-up

Under the Swedish Anti-Money Laundering Act (lag (2017:630) om åtgärder mot penningtvätt och finansiering av terrorism), PayEx is required to know its customers. PayEx may make decisions based solely on automated processing for the purpose of ensuring adequate customer due diligence. Automated decisions may be made in cases where previously provided customer due diligence data has not been changed by you during follow-up, or based on data that PayEx obtains from external sources.

7. Sharing of your personal data

PayEx may disclose your personal data to authorities to comply with law or other regulations relating to, for example, taxes, combating money laundering and terrorist financing. PayEx may also disclose your personal data in order to provide our services. To fulfil product and service agreements, PayEx may disclose personal data relating to you to other companies in the Swedbank group and sometimes to external companies we cooperate with, such as subcontractors, payment intermediaries, payees, partners and to parties acting on the customer's behalf.

In order to deliver our services to you, we may, depending on which service you have, share your personal data with different recipients. When we share your personal data, we ensure that there is a data processing agreement or data transfer agreement between us and the recipient where such is required and that your data is protected and processed in accordance with what is described in this privacy notice.

Recipients with whom we may share your personal data:

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- **Companies within the PayEx group and the Swedbank group (of which PayEx is a part as a wholly owned subsidiary)**

  The PayEx group has operations in the Scandinavian countries and in Finland. Read more about the PayEx corporate structure here: https://www.payex.com/about-payex-group/company-information (in English).

  The Swedbank group is primarily active in Sweden, Estonia, Latvia and Lithuania. Read more about Swedbank's corporate structure here: https://www.swedbank.com/sv/om-swedbank/organisation/internationell-narvaro.html

  When we share personal data within the groups, it is either to provide our services, fulfil regulatory requirements or to be able to report business statistics or payment execution. The legal basis for the sharing is performance of contract (Article 6(1)(b) GDPR), legal obligation (Article 6(1)(c) GDPR) or legitimate interest (Article 6(1)(f) GDPR), depending on the purpose of the specific sharing. We never share more information than is necessary for the purpose in the individual case.

- **Suppliers and subcontractors**

  PayEx may share your personal data with suppliers and subcontractors such as consultants, software providers (including development, operation, maintenance and support), data storage providers (including development, operation, maintenance and support) and companies providing scanning or printing services. We use their services to deliver our services to you, as they can give us access to services or functionality that we cannot offer ourselves.

  The sharing of personal data with subcontractors takes place primarily to fulfil our contract with you, or to comply with legal requirements. There are also occasions when we use external software for analysis; the processing activities are then either based on your consent or on a balancing of interests.

  The companies that receive personal data from us constitute so-called data processors or sub-processors in relation to PayEx. This means that they are only entitled to process personal data that they receive from PayEx on our behalf and in accordance with our instructions. This is regulated in data processing agreements between PayEx and the companies that receive personal data from us.

- **Authorities**

  We may disclose information to authorities, including the police, courts and tax authorities and financial supervisory authorities in our countries of operation when we have a legal obligation to do so. For example, we share information about interest and debts with the Swedish Tax Agency (Skatteverket) so that they can calculate your tax. We may also need to share information with the police and financial supervisory authorities (Finansinspektionen) to prevent fraud and to prevent money laundering and combat terrorist financing.

Sharing of personal data with the Swedish Tax Agency (Skatteverket) takes place if you have a debt and pay interest. Sharing of personal data with other authorities may take place regardless of which of our services you use. The legal basis for sharing with authorities is legal obligation (Article 6(1)(c) GDPR).

- Stores
  When you shop at a store, a physical store or an online store, we transfer personal data to the store. We do this so that the store can administer transactions, send what you have purchased and handle questions that may arise in connection with the purchase, delivery and complaints regarding a product or service. The legal basis for sharing with stores is performance of contract (Article 6(1)(b) GDPR).

- **PSP (Payment-Service-Provider) post-purchase portal**
  Sharing of personal data takes place if you use a PSP (Payment-Service-Provider) that offers PayEx services (e.g. Invoice or Instalment Account) and thereby initiated your payment to a store/webshop. The information is shared in order to carry out your request for payment of the chosen payment method and, where applicable, to be displayed in the PSP's post-purchase portal for the purpose of reporting completed transactions and payment status. The legal basis is performance of contract (Article 6(1)(b) GDPR).

- Payment service providers
  When you use such a payment method to pay for your purchase, PayEx may share personal data with both the store and the payment service provider. This sharing takes place in accordance with the stores' and payment service providers' own privacy notices. The sharing with stores and payment service providers is done to carry out a transaction you have initiated. The legal basis is performance of contract (Article 6(1)(b) GDPR). Where applicable, sharing may also take place on the basis of legal obligation (Article 6(1)(c) GDPR) in accordance with the Swedish Payment Services Act (lagen (2010:751) om betaltjänster).

- Credit reference agencies

  We may share your personal identity number with a credit reference agency when you apply for a service that involves the granting of credit. Sharing of your personal identity number may also take place if you choose to pay against invoice and the invoice amount exceeds a certain threshold. To obtain a credit report, we send your personal identity number to the credit reference agency. Your creditworthiness is not affected by PayEx obtaining a credit report.

  When carrying out credit assessments of consumers, we obtain credit reports on the basis of legal obligation (the Swedish Consumer Credit Act (konsumentkreditlagen (2010:1846)) and the Swedish Banking and Financing Business Act (lag (2004:297) om bank- och finansieringsrörelse)), which obliges us to assess your ability to pay. When carrying out credit assessments of merchants, credit reports are obtained on the basis of legitimate interest in minimising business risk.

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- **Companies conducting debt collection operations**

  When selling overdue debts to third parties, we share personal data. We also do so in cases where we commission another debt collection company to collect overdue debts. The debt collection companies process personal data in accordance with their own privacy notices. The legal basis for sharing in connection with debt collection operations is legitimate interest (Article 6(1)(f) GDPR). PayEx has assessed that we have a legitimate interest in collecting lawful and overdue receivables, and that this interest outweighs the data subject's interest in the data not being shared. You can request a copy of our legitimate interest assessment (LIA) via privacy@payex.com.

- **Person with power of attorney over your finances**

  We may share your personal data with a person who has the right to access them pursuant to a power of attorney granted by you. By using an agent, your contact with us can be simplified. The sharing is done based on the power of attorney granted. We may also share your personal data with a guardian, custodian or administrator based on a decision on such representation.

- **Banks and other financial institutions.**

  If you make payments to other accounts, we share your data, such as identification data and payment information, with the banks and credit institutions that hold the account.

  The sharing takes place to perform the agreement with you (Article 6(1)(b) GDPR). In cases where sharing takes place with financial institutions on which PayEx depends to carry out your payment, or otherwise with payment service providers, the sharing is also based on PayEx legitimate interest in preventing misuse, including fraud (Article 6(1)(f) GDPR). PayEx has assessed that this interest is necessary to conduct a secure payment operation and that the interest outweighs the data subject's right not to have the data shared for this purpose. You can request a copy of our legitimate interest assessment (LIA) via privacy@payex.com.

  Receiving financial institutions are independent data controllers for their own processing of your personal data and do not act on PayEx behalf. Their processing is governed by their respective privacy notices

- **Social media companies**

  If you contact us via social media, your personal data will also be processed by the social media companies. Their processing of your personal data takes place in accordance with their respective privacy notices. The legal basis for PayEx sharing is legitimate interest (Article 6(1)(f) GDPR).

- **Sharing of personal data upon divestiture of business or assets**

  If PayEx chooses to sell assets or business, we may disclose your personal data to a potential buyer, or someone acting on behalf of a potential buyer, of such assets or business. The sharing takes place on the basis of legitimate interest (Article 6(1)(f) GDPR). PayEx has assessed that we have a legitimate interest in being able to carry out such a divestiture and that the interest outweighs the data subject's right not to have their data shared for this purpose. We ensure that the data is protected with appropriate confidentiality undertakings towards potential buyers.

- **Fraud prevention agencies and companies providing identity checks.**

  Your personal data is shared with fraud prevention agencies and companies providing identity checks. PayEx shares your data to verify your identity, check the accuracy of the data you have provided and to combat fraud and misuse.

  The sharing is based on PayEx legitimate interest in preventing fraudulent transactions and protecting both PayEx operations and you as a customer (Article 6(1)(f) GDPR). PayEx has assessed that the fraud prevention agencies and companies providing identity checks possess information about fraudulent behaviours and identity data that is necessary for PayEx to use in order to reduce the number of fraudulent transactions. The sharing is also in your interest, as it helps to prevent your data from being used for fraudulent purposes. We ensure that the processing this entails is necessary to pursue that interest and that our interest outweighs your right not to have your data processed for this purpose.

  Please note that the receiving fraud prevention agencies and identity check companies are independent data controllers for their own processing of your personal data and that their processing is governed by their respective privacy notices.

  You can request a copy of our legitimate interest assessment (LIA) via privacy@payex.com.

- **Partners**

  PayEx discloses personal data to companies we cooperate with if it is necessary to provide our services and permitted by law. Examples of such companies are: providers of electronic identification solutions, participants and/or parties related to national, European and international payment systems, intermediaries of financial services, auditors and other third parties participating in the execution of trade or with whom the customer has a contractual relationship and where such partner service is linked to PayEx services, or in connection with financial reporting, providers of databases or registers, debt collection companies and insolvency and/or bankruptcy administrators.

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8. Geographical area and transfer of personal data to countries outside the EU/EEA

As a general rule, your personal data is processed within the EU/EEA. In certain cases, data is transferred to countries outside the EU/EEA ("third countries"), including to the USA via cloud service providers and IT system providers. Such transfers only take place with the support of one of the following mechanisms:

European Commission adequacy decisions (Article 45 GDPR) – a list of approved countries can be found on the European Commission's website. EU Standard Contractual Clauses (SCCs) adopted by the European Commission (Article 46 GDPR) (In these cases we also assess whether there is legislation in the recipient country that affects the protection of your personal data. If necessary, we take special technical and organisational measures to ensure that the protection of your data is maintained when it is transferred to the country in question outside the EU/EEA.). EU-US Data Privacy Framework – applies to providers in the USA that are certified under this framework (www.dataprivacyframework.gov). This is an opt-in certification system for American companies, administered by the US Department of Commerce. This privacy framework includes a number of enforceable principles and requirements that must be certified by the American company and shall ensure that your data continues to be adequately protected.

The countries outside the EU/EEA to which we currently transfer personal data include: the USA. In individual cases, transfers may also take place to other countries in connection with specific supplier collaborations. If you would like to know more about the safeguards that apply to a specific transfer, you are welcome to contact us via privacy@payex.com. The countries covered by the EU's adequacy decisions can be found here: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

9. How long we retain your personal data

PayEx will not process personal data for longer than necessary for the purposes for which the personal data was collected and only in accordance with retention rules in law and other regulations. For example, when the contractual relationship has ended, PayEx will retain personal data for accounting purposes and for purposes related to preventing money laundering and for the establishment, exercise or defence of legal claims in accordance with applicable legal requirements.

For certain data, PayEx also needs to comply with various legal requirements and may therefore need to retain your data even after the purpose for which the data was collected has ceased. If we retain your data to comply with legal requirements, we do not use your data for any other purpose than to comply with legal requirements.

- Personal data used for the contractual relationship between you and PayEx is normally retained during the term of the agreement and thereafter for a maximum of ten (10) years in accordance with limitation rules.

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- Personal data that PayEx must retain under the Bookkeeping Act is normally retained for seven (7) years after the year in which the customer relationship ended.

- Personal data that PayEx must retain under anti-money laundering legislation is normally retained for five (5) years after the end of the customer relationship. If a report has been made to the Financial Intelligence Unit, the information is retained for ten (10) years.

- Personal data obtained with consent as the legal basis: The personal data is stored for as long as a valid consent exists.

If the purpose for which the personal data was collected has ceased and we have no legal requirement to retain the data, we must instead make an assessment of whether we need the data to protect ourselves from legal claims.

The most important guidelines for retention periods are set out below:

Legal requirement/situation	**Retention period**	**Legal basis**
Accounting obligation (transactions, receivables, payments)	7 years after the end of the financial year	Swedish Bookkeeping Act (bokföringslagen (1999:1078))
Customer due diligence and AML documentation	5 years after the end of the business relationship (may be extended to 10 years)	Swedish Anti-Money Laundering Act (lag (2017:630) om åtgärder mot penningtvätt och finansiering av terrorism)
Credit agreements and consumer credit documents	During the term of the credit relationship	Swedish Consumer Credit Act (konsumentkreditlagen (2010:1846))
Debt collection cases	Until the case is closed and limitation has occurred	Swedish Debt Collection Act (inkassolagen (1974:182))
Direct marketing	Until you unsubscribe or object	GDPR Art. 21
Customer service cases	Up to 18 months after the case is closed	Legitimate interest

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Savings and account services	The contract period and 7 years after the end of the contractual relationship.	Contract and Swedish Bookkeeping Act (bokföringslagen (1999:1078))

The legal requirements described above mean that PayEx may not erase your personal data even if you request erasure. If PayEx has no legal requirement to retain the data, PayEx must instead make an assessment of whether PayEx needs the data to protect PayEx from legal claims.

10. Your obligation to provide personal data and consequences

In certain situations you are obliged to provide personal data to us, or need to provide them for us to be able to provide a service or enter into an agreement with you. The table below explains when the provision of data is mandatory and what happens if you choose not to provide the data.

Type of data	Obligation	Consequences of non-provision
Identity and contact details	Contractual obligation (in order to be able to choose to enter into an agreement with PayEx) – required to enter into an agreement	PayEx cannot enter into the agreement or provide the requested service
Financial information for credit applications	Contractual obligation (in order to be able to choose to enter into an agreement with PayEx) / Legal requirement (Consumer Credit Act)	PayEx cannot carry out a credit assessment and therefore cannot grant credit
Customer due diligence data (KYC/AML)	Statutory obligation under the Swedish Anti-Money Laundering Act (lag (2017:630) om åtgärder mot penningtvätt och finansiering av terrorism)	We cannot enter into or continue the business relationship
Tax residency and tax identification number	Statutory obligation (e.g. FATCA, CRS)	We cannot fulfil our reporting obligation; the business relationship cannot be established

Data for direct marketing and newsletters	Voluntary (consent)	You will not receive marketing from us – no other consequences

11. How we protect your personal data

PayEx has taken appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, destruction or improper alteration. The measures aim to ensure a level of security appropriate to the risk of each processing activity and include, among other things, pseudonymisation and encryption of personal data, access controls and solutions that maintain the confidentiality, integrity, availability and resilience of our systems and services.

We have procedures and technical solutions to restore access to personal data within a reasonable time if an incident should occur, for example through backup and redundancy systems. Our security measures are regularly tested, examined and evaluated to ensure that they remain effective.

We also work according to the principles of data protection by design and data protection by default, which means that data protection is taken into account already when we design and select new systems and services, and that default settings are designed so that only the personal data that is necessary for the purpose in question is processed.

Your data is always processed by authorised personnel within PayEx and at our suppliers, in accordance with the data processing agreements and access controls described in section 7.

If you suspect that your personal data has been subject to unauthorised access or similar, you are welcome to contact us via privacy@payex.com.

12. Cookies

PayEx uses cookies and similar tracking technologies on its websites. A cookie is a small text file that is saved in your browser when you visit our website. Cookies are used for the website to function correctly, to collect statistics about visitors and to customise content and advertisements. We use the following types of cookies: (i) necessary cookies that are required for the website to function correctly and that cannot be deactivated, (ii) functional cookies that enable enhanced functionality and personalisation, (iii) statistics cookies that help us understand how visitors interact with the website, and (iv) marketing cookies that are used to display relevant advertisements and measure the effectiveness of advertising campaigns. You can change your cookie settings at any time via our cookie banner on the website or via the settings in your browser. Please note that if you deactivate certain cookies, it may affect the functionality of the website. More information about our use of cookies can be found in our Cookie Policy at https://payex.se/om-cookies/.

13. Changes to the privacy notice

We may update this privacy notice as needed. If we make material changes – e.g. new purposes, new recipient categories, new third-country transfers, changed legal basis or new profiling – we will actively notify you via email or another appropriate channel where possible and we can reach you via registered contact details. Minor editorial updates are communicated by publishing the updated version on our website.

The latest version of our privacy notice is always available on our website (www.payex.se/dataskydd). You can also have a copy of the latest version sent to you by contacting us via any of the contact channels that you can find under section 2.

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