

# Sweetpay's Privacy Notice for Users

In this Sweetpay Privacy Notice for Users ("**Notice**"), references to "Sweetpay", "we", "us" and "our" will mean the member within the Financial Tech Sweden AB group of companies (for contact details please read "**Questions and queries**" below) that provide you with a service.

Financial Tech Sweden AB and its group companies will collectively be referred to as the "Group".

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## Why do we inform you?

We know that your privacy and how your personal data is used is important to you. This Notice outlines in detail how we collect, process, use and transfer (collectively "**process**") your personal data. In light of the volume of information in this Notice, please use the content section above to identify the areas you are most interested in.

Personal data is information that relates to an individual who can be identified from that information, whether or not in conjunction with any other information. Common examples of personal data processed by Sweetpay in its day to day business include name, address, telephone number, credit score and IP address.

## Who is the data controller?

The data controller is Sweetpay, meaning that we determine how and the reason why your personal data is processed. For contact details, please read "**Questions and queries**" below.

Where we have appointed a data protection officer (DPO), you may contact the DPO via the contact details provided in "**Questions and queries**" below.

## Processing of your personal data

### *How and why do we process your personal data?*

The personal data we collect from you or via our systems or third parties are used for us to provide the service to you and to the merchant via which you have been connected with us but also to comply with our legal obligations or to conduct our business. The personal data we collect, the legal basis for our processing and the purpose of the processing are detailed below. Please note that the personal data processed may vary depending on the service provided. Please note also that personal data in the below table may be processed by different companies within the Group. Sometimes, these activities are carried out by third parties, including other members of the Group (see "**Does Sweetpay share personal data with others?**" below).

Most of the personal data we process is obtained from you, the merchant you have connected with us via or third-party providers such as credit bureaus.

In some circumstances, we may request your explicit consent to process (specific types of) personal data. In these circumstances, you are able to withdraw your consent at any time by following the instructions provided when you gave your consent or via the contact details below (see "**Questions and queries**").

Personal data processed	
Information provided by you	Information gathered by us
<ul style="list-style-type: none"> <li>• Personal ID no (SSN)</li> <li>• Date of birth</li> <li>• Phone number</li> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• Personal ID no (SSN)</li> <li>• Date of birth</li> <li>• Name</li> <li>• Phone number</li> <li>• Email address</li> <li>• Address</li> <li>• IP-address</li> <li>• Number of credit remarks</li> <li>• Billing data</li> <li>• Your interactions with us</li> <li>• Credit score (provided by third parties)</li> </ul>

Purpose of processing	Legal basis
To provide our service	Our contractual obligations to you
To make credit decisions	Our contractual obligations to you and our legal obligations
To confirm your identity and your contact details	Our contractual obligations to you and our legal obligations
To administrate your payment	Our contractual obligations and other legitimate interests
To send information to you in electronical format (no marketing!) and to communicate with you	Our contractual obligations, legal obligations and other legitimate interests
To evaluate whether we can provide our service to you, by for example obtaining your credit score from a third-party provider	Our contractual obligations and legal obligations
To prevent abuse, fraud and misuse and to perform risk management	Our contractual obligations, legal obligations and other legitimate interests
To provide customer service	Our legitimate interests
To fulfill our legal obligations	Our legal obligations
To improve and develop our services	Our legitimate interests
To debug our service	Our contractual obligations and our legitimate interests

### **Profiling and automated decision making**

Profiling means an automated processing of personal data to assess certain individual characteristics of you as a user, for example by analyzing and predicting your financial situation. We use profiling

to manage whether you are eligible to pay by invoice to ensure that our credit decisions are efficient and responsibly made. Automated decision-making means that we use certain services, for example providing a credit, based only on automated decisions without involvement of a natural person. By using automated decisions, we increase the level of objectivity and transparency when providing these services. These decisions are based on your credit score provided by a third party. You always have the right to question an automated decision and then a person from our team will look at your matter.

## **Does Sweetpay share personal data with others?**

### ***Our Group Companies***

Personal data will only be shared across the Group in certain circumstances and where it is lawful to do so. It may be necessary to share your personal data with other members of the Group, which includes a potential holding company and its subsidiaries for the purposes of our business management. Access rights between members of the Group are limited and granted only on a need to know basis, depending on job functions and roles.

### ***Merchants***

Your personal data will to some extent be shared with the merchant where you made your purchase and used our service. This enables the merchant to administer and execute your purchase, manage your relationship with the merchant, send goods, manage disputes and profile their customers in categories such as age or gender, but they may also use the data to prevent fraud. The merchants receive the personal data as independent controllers which means that their privacy notice will apply to their processing of your personal data.

In some situations, the merchants can also receive information about you as a processor processing the information on our behalf which means that it is still this Notice that regulates their processing of your personal data.

### ***Service Providers as processors***

We use third-party service providers who provide services including IT services, audit and security services. In providing the services, your personal data will, where applicable, be processed by the service provider on our behalf.

We will control any third-party that we use to ensure that they can provide sufficient guarantees regarding the confidentiality and security of your personal data. We will have written contracts with them which provide warranties regarding the security of your personal data as well as warranties that they comply with our data security standards and international transfer restrictions.

### ***Independent controllers***

We also use third-party services providers who provides services including postal services, credit bureaus, debt collection (this may be within our Group or third-parties). These services are provided by independent controllers which means that their privacy notices will apply to their processing.

### ***Disclosure to third parties***

In certain circumstances, we share and/or are obliged to share your personal data with third parties outside the Group, for the purposes described above and in accordance with the applicable laws. These third parties include:

- administrative authorities (e.g. tax authorities and enforcement authorities)
- financial institutions
- insurance providers
- police, public prosecutors
- external advisors

If we were to sell our business or assets we may share your personal data with the potential purchaser of such business or assets.

## Does Sweetpay transfer personal data to countries outside the EEA?

We may also transfer your personal data we process to a country outside the European Economic Area ("EEA"), for example, when one of our service providers use staff or equipment based outside the EEA or when a company within our Group is located outside the EEA. We have put in place adequate safeguards with respect to the protection of your privacy, fundamental rights and freedoms, and the exercise of your rights. We ensure that your privacy is protected by an adequate level of data protection through EU Standard Contractual Clauses based on the EU commission's model clauses or through binding corporate rules within the Group. If you would like to see a copy of any relevant provisions, please contact us (see "Questions and queries" below).

## How is my personal data secured?

Sweetpay operate state of the art IT security systems to protect the confidentiality, integrity and availability of your personal data. We have in particular taken appropriate security measures against unlawful or unauthorized processing of personal data, and against the accidental loss of, or damage to, personal data. Access is only granted on a need-to-know basis to those people whose roles require that they process your personal data.

## How long does Sweetpay store my personal data?

We will store your personal data for as long as we need it to fulfil the purposes for which it was collected (see above) and in order to comply with legal and regulatory requirements. This may mean that some information is held for longer than other information. If you would like further information about our data retention practices, please refer to our Data Retention Notice.

## What are my rights under applicable data protection laws?

You have various rights which you can enforce, including the right to be informed in accordance with this Notice. The below table provides a summary of the rights that the law entitles you to. The table also includes information on possible conditions and limitations on how the right can be exercised and how your right can be executed.

Your right	What does it mean?	How do I execute this right?	Conditions to exercise?
Right of access	You have the right to access to the personal data that we have on you.	Requests for such information should be made in writing to legal@sweetpay.com. If possible, you should specify the type of information you would like to see to ensure that our disclosure meet your expectations.	We must be able to verify your identity. Your request may not affect the rights and freedoms of others, e.g. privacy and confidentiality rights of other staff.
Right of data portability	You may be entitled to receive the data which you have provided to us and which is processed by us by automated means, in a commonly-used machine readable format.	Requests should be made in writing to legal@sweetpay.com. If possible, you should specify the type of information you would like to receive to ensure that our disclosure meet your expectations.	The GDPR does not establish a general right to data portability but if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (e.g. not paper records) you can exercise this right. The right includes only personal data that you have provided to us. Hence, the right does not apply to personal data generated by us.
Rights in relation to inaccurate personal or incomplete data.	You may challenge the accuracy or completeness of personal data which we process about you. If it is found that personal data is inaccurate, you are entitled to have the inaccurate data	We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration	This right only applies to your own personal data. When exercising this right, please be as specific as possible.

	removed, corrected or completed, as appropriate.	status. A request to use this right is made in writing to legal@sweetpay.com.	
Right to object to or restrict our data processing of your personal data.	You have the right to object to or ask us to restrict the processing of your personal data.	Requests should be made in writing to legal@sweetpay.com.	This right applies only if the processing of your personal data is explicitly based on our so-called legitimate interests (see " <b>How and why do we process your personal data?</b> " above). Objections or request for restrictions must be based on grounds relating to your particular situation. This means that your request for the objection or restriction cannot be generic or too general.
Right to have personal data erased	You may be entitled to have your personal data erased (also known as the "right to be forgotten"), e.g. where you think that the information we are processing is inaccurate, or the processing is unlawful.	Requests should be made in writing to legal@sweetpay.com.	There are various lawful reasons why we may not be in a position to erase your personal data. This may apply (i) where we have to comply with a legal obligation, (ii) in case of exercising or defending legal claims, (iii) where we have to comply with legal archiving obligations, or (iv) where the personal data is necessary for the performance of our contract with you.
Right to withdrawal	You have the right to withdraw your consent to any processing for which you have previously given consent to.	Requests should be made in writing to legal@sweetpay.com or as instructed when you gave your consent.	If you withdraw your consent it will only take effect for the future.

## Questions and queries

If you would like further information about our processing of your personal data, your rights, including rights about access to data and correction of inaccurate data, please contact your contact person with us or send an email to legal@sweetpay.com.

Financial Tech Sweden AB, reg. no 556906-0477, has its registered office at Mäster Samuelsgatan 42, 111 57 Stockholm.

Please feel free to contact us if you have any questions on our processing of your personal data. Please also note that if you find our processing to be in breach of this policy or data protection legislation you can always lodge a complaint with Datainspektionen, which is the supervisory authority in Sweden.

## Cookies and other tracking technologies

We use cookies and other tracking technologies to deliver a personalized user experience. You can read more about our use of cookies in our Cookie Notice.

## Changes to this Notice

We may decide to change this Notice. If the change is indicative of a fundamental change to the nature of the processing (e.g. enlargement of the categories of recipients or introduction of transfers to a third country) or a change which may not be fundamental in terms of the processing, but which may be of great importance to you, then the updated Notice will be provided to you well in advance of the change actually taking effect. We send them to you via e-mail or publish them on our website so that you will be aware of the changes. When notifying you of such changes, we will also explain what the likely impact of those changes on you will be, if any.