

Tink's General Privacy Notice

Effective date: 18-06-2024

At Tink, our purpose is to change the banking industry for the better. Over the years, we have built one of the most robust open banking platforms, which enables our business customers to build products that leverage financial information or allow users to make payments. Respecting your privacy is central to our purpose. Tink has a Global Privacy Program to help ensure your information is handled properly, and your personal information is protected. Our Privacy Program reflects the sensitivity of the personal, financial, and other information we handle. It also reflects the requirements of the privacy laws in all the countries and states where Tink operates.

As a global company, Tink fulfills many roles. When we act as a service provider for Tink customers, we only collect and use personal information as authorized by our contracts with our customers. If you have questions about how these companies handle your personal information, or wish to exercise your rights, please contact them directly.

This Privacy Notice applies if you visit our websites, when you submit your personal information to us via e.g. e-mail or the contact forms at Tink's websites, or where you otherwise reach out to Tink for business purposes or use our services for such purposes, as well as where Tink has collected personal information about you for business purposes via e.g. public sources or at an event, meeting or similar interaction, and when Tink sends you marketing communications for business purposes. It explains how Tink AB and other Tink companies within the Visa Group ("Tink," "we," "us," or "our") collect, use, and disclose personal information. Some Tink companies and services have different privacy notices that are provided when you use them. We also have some supplemental privacy notices that provide additional information as required by law. For instance, this General Privacy Notice does not apply to personal information we collect about end users when they connect their financial accounts through Tink, since this is covered by the relevant Privacy Notices for end users.

You can contact Tink by emailing us at contact@tink.com or writing to us at:

- If you are in Europe: Tink AB, Vasagatan 11, 111 20 Stockholm, Sweden

- If you are in Germany: Tink Germany GmbH,
Gottfried-Keller-Strasse 33, 81245 Munich, Germany
- If you are in the UK: Tink Financial Services Limited, Sweden House, 5
Upper Montagu Street, W1H 2AG, London, United Kingdom

Personal Information

Personal Information is any information that we can use to identify, locate, or contact you, along with other associated information. It also includes other information that may be associated with your personal information. We collect several types of personal information, including:

- **Contact Information** that allows us to communicate with you, such as your name, mailing address, telephone number and email address, or social media profile names.
- **Relationship Information** that helps us do business with you, such as information that can help us understand you and offer you personalized content.
- **Information about your Interactions with Tink**, such as data collected when you:
 - Use our products, services or websites, including information collected using [Cookies](#) and other technologies, which may include geolocation information, browsing history and other information available via digital interactions
 - Communicate with us, such as if you contact our customer service centers, including recording calls for quality and training purposes
 - Participate in promotions or programs
 - Attend Tink sponsored events, such as travel-related information for you and any companions and information gathered at the events, such as photos or videos
 - Opt in or out of marketing or exercise your other choices

How We Collect Personal Information

We may collect personal information directly from you, or third parties may collect personal information from you on our behalf. For example, you may contact us,

register for a promotion, sign up to receive messages from us or participate in a Tink-sponsored event.

We collect information when you visit our websites or engage with our emails or ads. You can learn more by reading our [Cookie Notice](#). We may also capture device characteristics like keystroke timing to help us authenticate you. We may collect information that you post publicly on social media.

We may also obtain information about you from data brokers who help us enhance our records with demographic data and public records. For example, we may receive personal or household characteristics, such as your estimated age or household income.

In all cases, the information we collect is subject to applicable laws and the choices that you may have exercised.

How We Use Personal Information

We use personal information to:

- Provide you with the products, services, programs, offers, or information you request from Tink, and for related purposes such as determining eligibility and customer service.
- Administer surveys, loyalty programs, sweepstakes, contests, and events.
- Based on your choices, deliver marketing communications, personalized offers and interest-based ads to you.
- Understand how you and others use our products, for analytics and modeling and to create business intelligence.
- Generate de-personalized, de-identified, anonymized, or aggregated datasets, which are used for product development.
- Support our everyday business purposes, such as for account management, quality control, website administration, business continuity and disaster recovery, security and fraud prevention, corporate governance, reporting and legal compliance.

Please note that we may also use and disclose information that is not personally identifiable. For example, we may publish reports that contain aggregated or statistical data. These reports do not contain any personal information.

Why Personal Information is Disclosed to Others

We may disclose your personal information to:

- Third parties as needed, to manage fraud, compliance and complaints, and for similar purposes (such as investigating disputed charges)
- Other members of the Visa Group, which may only use your information for the purposes described in this Notice, and
- Our service providers, who use your information to provide services to us and are required to protect it

We may share your information with other third parties as permitted by law, such as when we sell or transfer business assets, enforce our contracts, protect our property or the rights, property or safety of others, or as needed for audits, compliance, and corporate governance.

We will also disclose personal information when required to do so by law, such as in response to a subpoena, including to law enforcement agencies, regulators and courts in the United States and other countries where we operate.

Online Privacy

When you visit our websites or engage with our emails and online ads, we may collect information by automated means, using technologies such as cookies, pixel tags, browser analysis tools, server logs, and web beacons.

In some cases, the information we collect is only used in a non-identifiable way. For example, we use information we collect about all website users to optimize our websites and to understand website traffic patterns. We do not use this information to profile you or target our ads.

In other cases, we may use the information in an identifiable way. For example, we may authenticate you or your device, deliver personalized content or use the information for analytics, fraud detection, and security. We may also use the information for online ad targeting. Our [Cookie Notice](#) provides more information about our online data collection technologies and your choices.

As described in our [Cookie Notice](#), we have relationships with third-party advertising companies. These third parties may track you, your browser or your device across different websites and applications.

Subject to your settings, we may place cookies or tags on your computer when you visit our website so that they can display targeted advertisements to you on other websites. The use of your data by these companies is subject to their own privacy policies.

Many Tink websites only place marketing, personalization, and advertising cookies if you explicitly accept these cookies by clicking “Accept All Cookies” when you first visit the website. Our [Cookie Notice](#) explains how to manage your preferences and how to disable previously accepted cookies.

Our websites may enable you to interact with us and others via social media platforms. We collect information from these platforms as permitted by the sites’ legal terms. We may also display interest-based ads to you when you are using these platforms. The platforms allow us to personalize the ads that we display to you, and they may gain insights about individuals who respond to the ads we serve.

Your Choices and Privacy Rights

Tink offers you different choices about how we use your information. We also offer you choices about how we communicate with you. We respect your rights to access and correct your information and to request that we delete your information if we no longer need it for a business purpose. You can submit requests to us by contacting us via email to contact@tink.com or write to us at the address above.

Additionally, if you have questions about how our customers handle your personal information, please check the privacy notices provided by these companies and contact them directly for assistance with any privacy requests. When Tink acts as a service provider (also called a data processor) for our customers, we only process your information as instructed by our customers to provide the services and for other appropriate purposes, such as recordkeeping and compliance. We rely on our customers to provide you with appropriate privacy notices and to manage your privacy rights.

Supplemental Privacy Notice: Residents of some states and countries have additional privacy rights. Information on these rights is provided at the end of this Privacy Notice.

International Transfers

Tink has companies and service providers around the world. Your personal information may be transferred to other countries, which may not have similar privacy or data protection laws. However, we will always protect your information as described in the Privacy Notice, no matter where it is stored.

Information Security and Data Retention

We use physical, technical, organizational, and administrative safeguards to help protect your personal information from unauthorized access or loss. For example, we use encryption and other tools to protect sensitive information. We retain your personal information as needed for the purposes listed above and as permitted by law.

Privacy Policies of Third Parties

Social media platforms and other websites that may be accessed through Tink's websites also have their own privacy policies. We encourage you to read the privacy notices provided by these sites before you give them your information.

Job Applicants

If you have applied for a job at Tink, the personal information in your application will be used and retained for recruiting, compliance and other customary human resources purposes.

Children's Data

Tink's platforms are not directed to children, and Tink only collects information from children as permitted by law. For example, we may collect data from children over 16 who are allowed by law to interact with Tink or if we have appropriate consent, such as if children attend Tink sponsored events with adult caregivers. If you believe that we are processing a child's information inappropriately, please contact us.

Changes to this Privacy Notice

We may update this Privacy Notice from time to time. Please check back frequently to see the latest version on our website.

How to Contact the Tink Privacy Office

If you have questions or comments about our privacy practices, or if you would like help exercising your privacy rights, please contact us.

You can:

- Email us: contact@tink.com
Please do not include sensitive information, such as your account number, in emails.
- Mail us a letter:
 - If you are in Europe: Tink AB, Vasagatan 11, 111 20 Stockholm, Sweden
 - If you are in Germany: Tink Germany GmbH, Gottfried-Keller-Strasse 33, 81245 Munich, Germany
 - If you are in the UK: Tink Financial Services Limited, Sweden House, 5 Upper Montagu Street, W1H 2AG, London, United Kingdom

Supplemental Privacy Notice EEA, UK and Switzerland

Tink is providing this supplemental privacy notice to give individuals in the European Economic Area (EEA), the United Kingdom (UK) and Switzerland the additional information required by the EU General Data Protection Regulation and the UK and Swiss equivalents. These provisions, which should be read together with the statements in the Tink General Privacy Notice explain our practices with regard to data privacy in the EEA, UK and Switzerland.

1. Information about Tink

This information is being provided by Tink AB for itself:

Tink AB, Vasagatan 11, 111 20 Stockholm, Sweden

and other Tink companies within the Visa Group, including:

Tink Germany GmbH, Gottfried-Keller-Strasse 33, 81245 Munich, Germany

Tink Financial Services Limited, Sweden House, 5 Upper Montagu Street, W1H2AG, London, United Kingdom

You can contact Tink by emailing contact@tink.com or writing to us at:

- If you are in Europe: Tink AB, Vasagatan 11, 111 20 Stockholm, Sweden
 - If you are in Germany: Tink Germany GmbH, Gottfried-Keller-Strasse 33, 81245 Munich, Germany
- If you are in the UK: Tink Financial Services Limited, Sweden House, 5 Upper Montagu Street, W1H 2AG, London, United Kingdom

2. The Purposes and Legal Basis for Processing, including Legitimate Interests

The Tink General Privacy Notice explains the reasons why we process your Personal Information (as defined in the General Privacy Notice). We only process Personal Information when we have a legal basis for the processing, as follows:

- With your consent (or provided you have not objected, or opted-out, as may be appropriate under applicable law), to provide you with marketing communications, or,
- To comply with the laws that are applicable to us around the world

We may also process your Personal Information for the purposes of our own legitimate interests or for the legitimate interests of others provided that processing does not and shall not outweigh your rights and freedoms. In particular, we will process your Personal Information as needed to:

- Protect you, us or others from threats (such as security threats or fraud),
- Enable or administer our business, such as for quality control, consolidated reporting, and customer service,
- Manage corporate transactions, such as mergers or acquisitions, and

- Understand and improve our business or customer relationships generally

3. When You are Required to Provide Personal Information to Tink

You are not required by law to provide any Personal Information to Tink. For example, you always decide whether to participate in Tink promotions or to use Tink services. You are required to provide certain Personal Information to enable us to enter into a contract with you so that you can use our products and services or participate in promotions. Our registration forms indicate which data elements are required for our contracts.

When Tink provides payment processing services or acts as a data processor, we receive your Personal Information from third parties as needed to provide services.

4. Your Rights

You have choices about how Tink uses your Personal Information. You always have the right to object to our marketing communications. You can also object to having your Personal Information used to create anonymized and aggregated marketing reports. To exercise these choices and other choices, email us at contact@tink.com.

Tink also respects the rights of EEA residents to access, correct and request erasure or restriction of their Personal Information as required by law. This means:

- You generally have a right to know if Tink is storing your Personal Information. If we are, you have the right to request that we provide you with a copy of that Personal Information, or in some cases, provide the information to another data controller. If your information is incorrect or incomplete, you have the right to ask us to update it.
- You have the right to object to our processing of your Personal Information.
- You may also ask us to delete or restrict your Personal Information.
- If we are processing your Personal Information based on your consent, you have the right to withdraw your consent at any time.
- To exercise these rights, please contact us via email to contact@tink.com or write to us at the address above and a member of our team will assist

you. Please understand that we may need to verify your identity before we can process your request.

If Tink is processing your Personal Information as a data processor, we will refer you to our customer for assistance with these requests. Tink supports its customers in responding to requests as required by law.

If you believe that we have processed your Personal Information in violation of applicable law, you may also file a complaint with the Tink Data Protection Officer, who can be reached by contacting us, or with a supervisory authority.

5. International Transfers

As noted in the Tink General Privacy Notice, your Personal Information may be transferred to, stored at or processed in countries that may not have equivalent privacy or data protection laws as in the EEA.

We generally use approved Standard Contractual Clauses to assure that Personal Information is adequately protected when it is transferred out of the EEA, the UK, or Switzerland to countries without an adequate level of data protection.

Tink will assure that any transfer of Personal Information between the EEA, Switzerland and/or the UK continues to be safeguarded as described in this section and in accordance with applicable data protection laws.

Please contact us via email to contact@tink.com if you would like more information about cross-border transfers or to obtain a copy of the Standard Contractual Clauses.

6. Data Retention

We will retain your Personal Information for as long as the information is needed for the purposes set forth above and for any additional period that may be required or permitted by law. The length of time your Personal Information is retained depends on the purpose(s) for which it was collected, how it is used, and the requirements to comply with applicable laws. You may request that we delete your Personal Information by contacting us via email to contact@tink.com or writing to us at the address above. If we do not have a legal basis for retaining your information, we will delete it as required by applicable law.