



PRIVACY NOTICE

Below, you will find information about how we process your personal data (“Privacy Notice”) in relation to Netaxept.

1. What does this Privacy Notice cover?

The protection of personal data is important to Nets Denmark A/S (hereinafter referred to as either “Nets”, “us”, “our” or “we”). That is why safeguarding personal data is essential to everything we do and why we strive to provide the best possible protection of your personal data.

Nets will process personal data about you either as an end-user, a merchant, or a partner when you choose to interact with us, including (i) when you use the Netaxept hosted checkout, (ii) when we onboard you to Netaxept, and (ii) when you use the Netaxept portal and other relevant interactions.

Nets will act as the data controller of the processes listed under the table in Section 2 below.

2. The type of personal data we process, our purposes and legal basis

2.1 End-User

If you are a card holder or other payer (“End-User”) paying via a Netaxept hosted checkout, Nets is processing your personal data as described in the table below.

Please note that your merchant, issuer and/or other payment provider(s) might process your personal data as an independent controller(s). For these services, please kindly refer to their privacy notice for information about how personal data is processed.

| Topic | When do we process personal data? | What kind of personal data? | What is the purpose? | What is the legal basis? | Who are the recipients? | What is the storage period? |
|-----------------|--|---|---|---|--|---|
| Checkout | When you provide your payment information at the hosted Netaxept checkout when you purchase goods or services online from any of the merchants in our network. | <p>Categories of personal data processed are dependent on the data required for the chosen payment method.</p> <ul style="list-style-type: none"> Payment details (card number, expiration date, security code (CVV2/CVC2/CVV/CID verification code), IBAN number, purchase details, and other information depending on payment method offered by the selected Payment Processor (e.g. acquirers and other participants involved in completing the payment transaction with the selected payment method). This could be national identification number. Contact information (email address, address, telephone number, company registration number). Transaction information (time and amount of transaction, type of payment transaction (e.g., pin/chip, CNP (eCom). IT information (IP address, web browser information and other unique identifier of device etc.). | The purpose of processing is to facilitate payment between you as the payer and the merchant via the hosted Netaxept service. | <p>The processing is necessary for the performance of a contract for verification and execution of your payment.</p> <p>The national identification number will be processed where necessary for unique identification and where required by law.</p> <p>The processing is necessary for the purposes of the legitimate interests pursued by us to fulfil our contractual obligations when offering Nets Netaxept services.</p> <p>The processing is necessary for compliance with a legal obligation to which Nets is subject to, e.g., Anti-Money Laundering regulations.</p> | <p>Payment Processors (e.g. acquirers and other participants involved in completing the payment transaction with the selected payment method).</p> <p>Under certain circumstances, regulators (e.g., Financial Supervisory Authorities), law enforcement agencies, courts as well as other companies within Nexi S.p.A. Group.</p> | We retain your personal data for a limited period and in accordance with our legal obligations to store the data, e.g., transaction data will be stored for five years in accordance with Anti-Money Laundering regulations, when applicable. |

2.2 Merchant and partner

If you are a merchant offering payments via Nets Netaxept or a partner of Nets, Nets is processing your personal data and/or the personal data of your employees as follows:

| Topic | When do we collect personal data? | What kind of personal data? | What is the purpose? | What is the legal basis? | Who are the recipients? | What is the storage period? |
|-----------------------------------|--|--|--|---|-------------------------|---|
| Nets Netaxept Admin System | When you create a user account in the self-service Nets Netaxept Admin System. | <ul style="list-style-type: none"> Name Address Company registration number Merchant number Email address | <p>The purpose of processing personal data is to:</p> <ol style="list-style-type: none"> enable you to self-configure your users in the portal, and | <p>The processing is necessary for the performance of a contract.</p> <p>The processing is necessary for the purposes of the legitimate interests</p> | N/A | We retain your personal data for a limited period and in accordance with our legal obligations to |

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|---------------------------|--|--|--|--|--|--|
| | | <ul style="list-style-type: none"> • Telephone number • Language preferences • IP address • Username/unique ID • Payment information (transaction time and amount, bank account number (including IBAN)) | 2. enable you to establish structured overviews of payments made by end users. | <p>pursued by Nets to provide a user interface to you which you can operate and configure themselves as well as provide you with the payment insights and an overview of payout details.</p> <p>The processing is necessary for compliance with a legal obligation to which Nets is subject to, e.g., Anti-Money Laundering regulations.</p> | | store the data, e.g., transaction data will be stored for five years in accordance with Anti-Money Laundering regulations, when applicable. |
| Sign-up process | When you provide your personal data in the context to sign-up to Netaxept. | <ul style="list-style-type: none"> • Name • Address • Email address • Company registration number • Merchant number • Card turnover • Industry category • Organisational information | The purpose of processing personal data is to sign you up to Nets Netaxept service. | <p>The processing is necessary for the performance of a contract.</p> <p>The processing is necessary for the purposes of the legitimate interests pursued by Nets, e.g., entering into a contract with you.</p> | N/A | Once an application is approved or rejected, your data will be deleted in accordance with our legal obligations to store the data. |
| Onboarding process | When we process your personal data in order to onboard you to Netaxept upon the signing of a contract with us. | <ul style="list-style-type: none"> • Company information (company registration number, organisational information, ownership information, Industry category, IBAN number, SWIFT/BIC, Merchant number) • Financial and credit information (card turnover, card scheme screening) • Contact information (name, email address, home address (e.g., beneficial owners), work address, telephone number) • Language preferences • Screening information (such as Politically exposed persons information (PEP), national identifiers (e.g. national identification or passport number), date of birth, nationality, passport information, title) | The purpose of processing personal data is to onboard you and perform our legal obligations related to the Anti-Money Laundering regulations (e.g., Know Your Customer). | <p>The processing is necessary for the performance of a contract.</p> <p>The processing is necessary for compliance with a legal obligation to which Nets is subject to, e.g., Anti-Money Laundering regulations.</p> | N/A | Depending on jurisdiction, we must retain your personal data for five years after the termination of the agreement, unless otherwise required under Anti-Money Laundering regulations. |
| Invoicing | When we process your personal data in order to issue invoices to you. | <ul style="list-style-type: none"> • Contact information (name, email address, address, telephone number, title) • Company information (company registration number, organisational information, ownership information, | The purpose of processing personal data is to issue invoices for using Netaxept. | <p>The processing is necessary for the performance of a contract.</p> <p>The processing is necessary for the purposes of the legitimate interests</p> | Personal data is shared with debt collection companies to enable those to perform the dunning and debt | Depending on jurisdiction, we retain accounting records, incl. invoices for a limited period, e.g., to |

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| | | Industry category, IBAN number, SWIFT/BIC, Merchant number, user name/Unique ID) <ul style="list-style-type: none"> Transaction amount | | pursued by the Nets to receive payments for provided the services. | collection on behalf of Nets. | comply with bookkeeping laws. |
| Marketing | Please refer to our General Nets Privacy Notice here . In this privacy notice, you will find the description of our marketing activities. | | | | | |

2.3 Other processing activities

| Topic | When do we collect personal data? | What kind of personal data? | What is the purpose? | What is the legal basis? | Who are the recipients? | What is the storage period? |
|--|---|-----------------------------|----------------------|--------------------------|-------------------------|-----------------------------|
| Statistics and business development | Please refer to our General Nets Privacy Notice here . In this privacy notice, you will find the description of our statistics and business development activities. | | | | | |
| Complaints and dispute handling | Please refer to our General Nets Privacy Notice here . In this privacy notice, you will find the description of our complaint and dispute handling activities. | | | | | |
| Contact with Nets | Please refer to our General Nets Privacy Notice here . In this privacy notice, you will find the description of our handling of your personal data when you interact with Nets at our offices, websites and other contact. | | | | | |

3. Where does your personal data come from?

The personal data what we process is mainly obtained from you, but it depends on the facts or the specific circumstances.

4. Who is engaged when we are processing your personal data?

Nets will keep your data confidential, but we may be disclosed it to the following recipient categories:

- Other entities of Nexi S.p.A Group (which Nets is a part of) if the legislations require us to share such information. We might also share your data to provide you with better products and services.
- External data processors acting on Nets’ behalf to whom the personal data can be disclosed while utilising their services, e.g. IT operation(s) or operational support.
- Relevant supervisory authorities as required by law, court orders or a request from the police or other authorities.
- External consultants/lawyers to establish, exercise or defend legal claims. Nets will ensure that the amount of personal data disclosed is limited to the extent necessary for the particular case.
- Third parties in order to complete transactions or provide any service that you have requested or authorised (e.g., card schemes such as MasterCard or VISA).

In the event such recipients have access to personal data collected or processed by us, the recipient acts as data processor and acts in accordance with a written agreement and under the instructions from us.

5. Transfers to countries outside EU/EEA

In some cases, we will transfer personal data to countries outside the EU/EEA. Such transfers will only take place subject to appropriate safeguards are in place for the transfer including:

1. The country has been deemed by the Commission of the European Union to have an adequate level of protection of personal data. Personal data can without further measures be transferred to such third countries.
2. The country has not been deemed by the Commission of the European Union to have an adequate level of protection of personal data, but we provide appropriate safeguards for the transfer through the use of “[Standard Contractual Clauses](#)”, as published by the Commission of the European Union, [EU-US Data Privacy Framework](#) or any other contractual agreement approved by the competent authorities or any other legal basis, including the use of supplementary measures if deemed necessary.

Where no appropriate safeguards are provided, such as the above mentioned, transfer of personal data to “unsafe” third countries can take place based on specific legal basis for the transfer.

For instance, the transfer can take place based (i) if you have consented hereto, (ii) for the performance of a contract with a company established in such third country and (iii) if necessary in relation to legal claims. The specific legal bases are stated in Article 49(1) of the GDPR.

You can always obtain a copy of the relevant legal basis for the transfer, or information about where it can be accessed, by contacting Nets Data Protection Officer. You will find the contact details under Section 8.

6. Security

Nets is dedicated to protecting your personal data.

As part of this dedication, we have adopted internal security policies and instructed our employees accordingly to comply with applicable legislation, e.g., the GDPR. We have implemented appropriate procedures and security measures to protect your personal data from being destroyed, lost or altered, publicised unlawfully and against being disclosed to unauthorised persons or otherwise processed contrary to applicable data protection legislation. Accordingly, we strive to protect the quality and integrity of your personal data. This includes encryption of data and use of pseudonymisation, whenever applicable.

As PCI DSS certified (Payment Card Industry Data Security Standard), Nets follows a set of controls for keeping cardholder data secure supported by a regulatory framework that is a requirement for Nets to operate as a processor of card payments.

7. Your rights as a data subject

As a data subject you have several rights available to you, which you, or a person authorised to act on your behalf, may exercise by contacting our Nordic Data Protection Officer via email dpo.nets@nexigroup.com or by submitting your request here:

[Data Subject Request](#)

According to the data protection regulations, you have the following rights:

1. The right to request information about what personal data we process about you.
2. The right to rectify your personal data.

3. The right to erase your personal data. Please note that exercising this right might be limited according to national law, i.e., we might not be able to delete and/or modify all personal data.
4. The right to object to the processing of your personal data and have the processing of your personal data restricted.
5. An unconditional right to object to the processing of your personal data for direct marketing purposes.
6. If processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. You may withdraw your consent for a specific service by following the instructions for the specific service, please refer to the website for the specific service offered by Nets.
7. The right to receive your personal information in a structured, commonly used and machine-readable format (known as data portability), subject to fulfilment of specific conditions set by data protection law.

Please note, Nets may decline disclosure to you if you are in possession of the information already or if disclosing it to you is impossible or would involve a disproportionate effort or would impair the achievement of the objectives of the processing.

If you have any concerns about the manner in which we process your personal data, you can contact the Danish Data Protection Agency (in Danish: "Datatilsynet"): www.datatilsynet.dk (website in Danish and English).

You can also lodge a complaint with a data protection supervisory authority in the EU/EEA member state of your habitual residence, place of work or where the alleged infringement has taken place.

8. Contact us

You are welcome to contact our Nordic Data Protection Officer if you have any questions, complaints or other concerns related to data protection and privacy on the following email address: dpo.nets@nexigroup.com

For questions to us of a more general character not concerning personal data, you can [write to us here](#).

Nets Denmark A/S
CVR-nr. 20016175
Klausdalsbrovej 601
DK-2750 Ballerup