

PRIVACY NOTICE – MERCHANTS

Below, you will find information about how we process your personal data (“Privacy Notice”) in relation to Nets acquiring services and payment terminals (the “Services”).

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.

This privacy notice explains how Nets obtains, processes and discloses personal data in relation to the services Nets provides in-store, online and mobile payment as well as solutions, services and a wide range of payment methods. In general, Nets will - in relation to our Merchant Services - process personal data about you as a merchant or a partner when you choose to interact with us.

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

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

2.1 Merchants

If you are a merchant offering payments via Nets Merchant Services 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?
Acquiring – Payment cards	<p>When transactions are completed with a payment card at the merchant.</p> <p>We process data about individuals who are customers with the merchants (cardholders), more specifically transaction data relating to the processing of card payments between the customer and the merchant, who has entered into an acquiring agreement with Nets.</p>	<ul style="list-style-type: none"> • Merchant name (sole proprietorships) • Address • Company registration number • Merchant number • Email address • Username/unique ID • Transaction data depending on the chosen payment method (the account number associated with the card or other payment method used, time and date of the transaction, the location of the transaction, and the amount of the transaction, authorisation code for said payment, card number, payment card's expiry date) 	<p>The purpose of processing personal data is to:</p> <ol style="list-style-type: none"> 1. Facilitate acquiring, which is the completion of credit and debit cards payments from consumers (cardholders) to merchants; 2. Deliver ancillary services to the merchants such as customer support, where we process personal data about merchants (sole proprietorships) and contact persons with the merchants; 3. Detect, prevent and combat fraud and money laundry, and improve network security for the benefit of both our customers and the cardholders. 	<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>	<p>We share data with merchants, card scheme (e.g., MasterCard) and banks necessary to complete transactions.</p> <p>We may share personal data related to acquiring with partners of Nets upon your permission.</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>	<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.</p>
End-to-end onboarding process: Acquiring – Payment cards	<p>We process your personal data in order to onboard you to our acquiring services upon signing of a contract with us.</p>	<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) 	<p>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 (KYC)").</p>	<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>	<p>We disclose your personal data to the following for the purpose of doing deviation reporting towards listed authorities, e.g.:</p>	<p>If your acquirer application is rejected from our site and a contract is never established, your personal data will be</p>

		<ul style="list-style-type: none"> • 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) 			<p>1. Erhvervsstyrelsen 2. FI Patent and Registration Office 3. Bolagsverket</p> <p>Further, 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>	<p>deleted after one (1) month.</p> <p>If an application never enters into force (e.g. due to lack of correct contact information and/or response from you), we will delete your personal data after three (3) months.</p> <p>If you have a signed and approved acquiring contract with us, we retain your personal data for five (5) years or as otherwise required after the termination of the contract in accordance with Anti-Money Laundering regulations.</p>
Payment terminals, PSP and terminal management system	When you have purchased and been onboarded to our payment terminal product for the sake of receiving payments.	<p><u>Payment terminals, PSP and terminal management system</u></p> <ul style="list-style-type: none"> • Authorisations • Bank account or card number • Co-branding, loyalty information and fleet card • Merchant name • Payment details (e.g., card holder name, card number, expiration date, card verification code, IBAN number, authorisation code for said payment) • Time of transaction • Transaction amount <p><u>Specifically for PSP and terminal management system:</u></p> <ul style="list-style-type: none"> • Receipts: Merchant address, company registration number and phone number • Merchant Category Code (four letter industry code assigned to a merchant) 	Purpose of processing personal data is to enable the merchant to accept payments via payment terminals.	<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>	<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> <p>For transactions related to Klarna, we share the phone number of the customer.</p>	<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.</p>

		<ul style="list-style-type: none"> • Payment details – PIN and Payment Account Reference • Numerical response code from bank/issuer: In case the transaction amount exceeds cardholder's available balance. Used for debit and prepaid products when the cardholder does not have available funds in their checking or savings account or for credit products when the cardholder has reached the credit card limit. 				
End-to-end onboarding process: Payment terminals	When we process your personal data in order to onboard you to our payment terminal product upon 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) • Contact information (name, email address, home address (e.g., beneficial owners), work address, telephone number) • 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>	For DIBS, Nets is the acquirer where DIBS is the terminal vendor and payment facilitator. Nets as an acquirer need to perform acquirer checks, where DIBS do the actual onboarding. Data need to be shared between the two parties to perform all the tasks.	<p>If your acquirer application is rejected from our site and a contract is never established, your personal data will be deleted after one (1) month.</p> <p>If an application never enters into force (e.g. due to lack of correct contact information and/or response from you), we will delete your personal data after three (3) months.</p> <p>If you have a signed and approved acquiring contract with us, we retain your personal data for five (5) years after the termination of the contract in accordance with Anti-Money Laundering regulations.</p>
Portals: - MyNets - Ice Portal - Teller - Nordic Portal, - MyPayments App	We will collect your personal data upon the onboarding process to the Portals.	<ul style="list-style-type: none"> • Company information (company registration number, organisational information, ownership information, Industry category, IBAN number, VAT number) • Contact information (name, email address, home address (e.g., beneficial 	Purpose of processing personal data is to being able to facilitate the Portals. Portals gives merchants an overview of their business and new insights about their customer behaviour. At the	<p>Necessary for the performance of a contract to which the data subject is party.</p> <p>Processing is necessary for the purposes of the legitimate interests: Nets has a legitimate interest to</p>	We may share personal data related to acquiring with partners of Nets and you upon your permission.	We delete your data no later than two (2) years after your profile has become inactive (unless the profile is deactivated before that).

- Merchant Portal DK - Merchant Portal Web - Reporting and Signom (collectively “Portals”)		<p>owners), work address, telephone number)</p> <ul style="list-style-type: none"> Bank information (merchant’s bank, BIC-code, bank branch office, bank account number IBAN) Products & services covered by the agreement (company industry) with Nets Business chain and/or group to which the merchant belongs Advance payments % Advance payments in days Language preferences Estimated net sales under the agreement with Nets Transaction data depending on the chosen payment method Card Acquiring reporting Super Admin user information: <ul style="list-style-type: none"> First name Last name E-mail address Phone number IP address 	<p>same time, Portals gives merchants a complete information of their product and service estate and all card transactions and settlements.</p>	<p>process personal data about partners' and merchants' and their employees to give business insights via a configurable user portal, including customer behaviour, payment insights and an overview of payout details</p>		<p>Admin profiles may be stored up to five (5) years after date of inactivity. [</p>
Nets Insights: Market insights and merchant insights	<p>We will process personal data when a customer submits their email to Nets creating an account for the customer in order to access the insight dashboard.</p> <p>Alternatively, a customer can get access to the relevant APIs (for instance Merchant Insights).</p>	<ul style="list-style-type: none"> Name of merchants (sole proprietorships) and contact persons with the merchants Email address Authorisations Customer number Transaction data depending on the chosen payment method (the account number associated with the card or other payment method used, time and date of the transaction, the location of the transaction, and the amount of the transaction, authorisation code for said payment), Card mix Card turnover Company registration number Industry category IP address 	<p>Personal data is processed to provide the market and merchant insights services related to the subscribed services and products.</p>	<p>Processing is necessary for the purposes of the legitimate interests: Nets is processing personal due to its legitimate interest in providing market insights to merchants.</p>	<p>Data is shared with merchants and partners to provide insights on own data.</p> <p>With Nets’ partners, Nets will only share data regarding merchants that are customers to Nets and have provided consents that the partner may receive the merchants’ data.</p>	<p>Data related to Merchant Insight and Market Insight (i.e., transaction data) will be kept for an ongoing period of one (1) year (current year) plus an additional four (4) years.</p> <p>User accounts will be deleted 30 days after last activity or after user deletion request.</p>
Nets Financing	<p>We process personal data in connection to pre-screening for marketing segmentation</p>	<p>In connection to marketing activities:</p> <ul style="list-style-type: none"> Contact information (name, email address) 	<p>The purpose of the processing activity - both for the pre-screening and in connection</p>	<p>Processing is necessary for the purposes of the legitimate interests pursued by the controller or a third</p>	<p>The personal data (i.e. the merchant data) is</p>	<p>Personal data obtained as part of the merchant’s</p>

	<p>before a financing application.</p> <p>We also process personal data after a financing application, in the performance/execution of a financing agreement between Liberis Ltd. and the merchant, in accordance with the terms agreed by the merchant with Liberis Ltd.</p>	<ul style="list-style-type: none"> Company registration number Customer number (MID) Transaction history <p>Following merchant application:</p> <ul style="list-style-type: none"> Name (i.e. Natural Persons) IBAN number Business address 	<p>with the offering of the product - is to identify the merchants that would potentially qualify for the product, as well as ensure that the merchant can receive the funding and Nets can perform the collection of re-payments on behalf of Liberis, as agreed between the merchant and Liberis Ltd.</p> <p>Nets Financing is a product facilitated by Nets, as the product is owned and offered by Liberis Ltd.</p>	<p>party, in connection with pre-screening of merchants relevant for Nets Financing for the purpose of marketing segmentation.</p> <p>Explicit consent, collected by Nets directly or provided by Liberis Ltd. on behalf of the merchant, provides the legal basis for the specific purpose of offering Nets Financing, as described in the purpose section.</p>	<p>shared with our partner, Liberis Ltd.</p>	<p>financing application is kept for thirty (30) days.</p> <p>For the pre-screening and segmentation, we keep your personal data for a running period of two (2) years.</p> <p>In terms of data connected with marketing, we keep your personal data for one (1) year.</p>
Prepaid card	<p>Personal data is processed when a merchant or partner orders or activates one or more prepaid cards.</p>	<ul style="list-style-type: none"> Email address Mobile phone number 	<p>The purpose of processing the personal data when purchasing a prepaid card is to provide the merchant/partner with the prepaid card service offered by Nets.</p>	<p>The processing is necessary for the performance of a contract (i.e., the prepaid card).</p> <p>The processing is necessary for the purposes of the legitimate interests pursued by Nets as Nets has a legitimate interest in processing personal data pertaining to representatives of limited companies that have asked for prepaid cards as a service and as such to comply with the contract entered with the merchant.</p>	<p>We will share relevant personal data with our partners and associated merchants.</p>	<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.</p>
Invoicing	<p>As part of the on-boarding process, we will collect relevant personal data in order for us to invoice you accordingly.</p>	<ul style="list-style-type: none"> Contact information (name, email address, address, telephone number, title) Company information (company registration number, organisational information, ownership information, Industry category, IBAN number, SWIFT/BIC, Merchant number, username/Unique ID) Transaction amount 	<p>The purpose of processing personal data is to issue invoices for using our products and services.</p>	<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., national book-keeping regulation.</p>	<p>Personal data is shared with debt collection companies to enable those to perform the dunning and debt collection on behalf of Nets.</p>	<p>Depending on jurisdiction, we retain accounting records, incl. invoices for a limited period under relevant local bookkeeping laws unless otherwise required e.g., under Anti-Money Laundering regulations.</p>
Settlement, negative balance and bankruptcy	<p>We collect personal data from the following sources: Banks, re-sellers, vendors, authorities (such as</p>	<ul style="list-style-type: none"> Contact information (name, merchant name (one-man company), email address, address, telephone number, title, Customer number) 	<p>The purpose of settlement is to process and receive transactions, calculating fees,</p>	<p>We have (i) a legitimate interest in processing settlements, (ii) a contractual requirement with you</p>	<p>We disclose personal data to the follow parties:</p>	<p>Depending on jurisdiction, we retain records for a limited period, e.g., to settle</p>

	<p>Virk.dk/statstidende.dk, Brønnøysund, ytj.fi, bolagsverket), Bisnode and Payment-Service-Provider (PSP).</p> <p>Further, we obtain information from external partners like MasterCard. These external partners submit data about a merchant that use products like Leverandørservice (DK) or Autogiro (SE and NO).</p>	<ul style="list-style-type: none"> • Company information (company registration number, organisational information, ownership information, Industry category, IBAN number, SWIFT/BIC, Merchant number, username/Unique ID) • Language preferences • Financial and credit information (card turnover, PCI data (Payment Card Information), PAN number, card scheme screening, IBAN number) • 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) • Transaction data depending on the chosen payment method (the account number associated with the card or other payment method used, time and date of the transaction, the location of the transaction, and the amount of the transaction, authorisation code for said payment, card number, payment card's expiry date) • IP address • Invoices 	<p>and paying out turnover to Nets' customers.</p> <p>Settlement is the process of following a transaction from the stage of initiation by the cardholder to the payout of the merchant as turnover in their store.</p> <p>Negative balance and bankruptcy refer to handling of debt and open posting on the settlement agreements of the merchants.</p>	<p>as a merchant to fulfil, and (iii) a legal obligation to comply with.</p> <p>The legitimate interest Nets pursue when processing your personal data is in facilitating settlement related activities and as such to comply with the contract entered into with Nets' customers.</p> <p>Further, the legitimate interest pursued are settlement tasks carried out by the interest of a third party, e.g., enforcement orders, authority inquiries, bankruptcies and debt collection process.</p>	<ul style="list-style-type: none"> • Payment processors such as Mastercard/VISA • Banks in related jurisdictions • Debt collection agency • External lawyers and authorities in case of bankruptcy 	<p>claims and comply with bookkeeping laws.</p>
Marketing	<p>Please refer to our General Nets Privacy Notice here.</p> <p>In this privacy notice, you will find the description of our marketing activities.</p>					

2.2 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 . 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.
- 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.

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, publicized unlawfully and against being disclosed to unauthorized 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, please [write to us here](#).

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