

Privacy Policy

Version: Doconomy AB Privacy Policy v 1.0

1. Introduction

At Doconomy, we want you to always be safe and secure when interacting with us. Your trust is our most important asset, and we therefore strive to apply to the highest ethical standards and to be transparent and collaborative in all we do. Your right to always keep your private data and personal information safe and protected is key to us. We always strive to be open and honest about how we collect, manage and use the information we receive and that you share with us.

2. Contact information

If you have any questions regarding the processing of your personal data, this Privacy Policy or otherwise have comments on Doconomy's processing of your personal data, please contact us on:

Doconomy AB
c/o RBK
Box 5172
102 44 Stockholm
E-mail: privacy@doconomy.com.

3. When do this privacy policy apply

This Privacy Policy (hereafter "**Privacy Policy**") describes how your information is collected, used and shared when you use our website (<https://doconomy.com>) and applies to the processing of your personal data conducted in relation to your use of our services provided through the Doconomy website (<https://doconomy.com>) hosted by Doconomy AB.

Doconomy AB with corporate identity number 559163-0602 and the address c/o RBK, Storgatan 8, 102 44 Stockholm (hereafter "**Doconomy**", "**our**", "**us**" or "**we**") is the data controller for the personal data processed about you in relation to your use of the Doconomy website.

The purposes of this Privacy Policy is to ensure that you understand what personal data we collect about you, why we collect and use it, and who we share it with and explain your rights and choices in relation to the personal data we process about you. Please read this Privacy Policy carefully and if you have any questions or need any help in relation to our Privacy Policy, please contact us.

4. Who can use the banking service DO

We do not and will not knowingly collect information from any unsupervised child under the age of 18. Our services and/or products are not directed at children and we do not knowingly collect any personal data from children. If you are under the age of 18, you may not use our services and/or products.

5. How do we collect your personal data

We collect your personal data in the following ways:

When you sign up. When you sign up through our early sign up function, we collect certain personal data so that we can provide you with information about Doconomy (such as your email address and name).

Through your use of our website. When you use the website, we collect personal data about your use of the website (such as from where you have visited the website and what you have looked at).

6. What personal data do we collect about you

Doconomy may collect and process the following categories of personal data when you use the Doconomy website:

Sign Up Data. When you sign up through our early sign up function, we collect your name and your email address.

Website Usage Data. This is the personal data that is collected about you when you are using the Doconomy website, this may include URL information, cookie data, your IP address, the types of devices you are using to access or connect to the website, device attributes, network connection type and provider, network and device performance, browser type, language, information on geolocation and operating system. Further details about the technical data that is processed by us can be found under Section 12 Cookies.

7. How we use your personal data

We use your personal data for the following purposes and based on the following legal basis:

Purpose of the processing	Legal basis for the processing	Categories of personal data used for the purpose of the processing
<p>We use your personal data to provide you with news regarding Doconomy and to market and advertise our products and services by e-mail and/or to keep track on your choices in relation to marketing. We may also use your personal data to administrate any customer satisfaction surveys or similar surveys that you participate in.</p>	<p>The processing is carried out on the basis of legitimate interest after a balancing of interests where Doconomy has pursued the following legitimate interests:</p> <ul style="list-style-type: none"> • Doconomy's interest of offering relevant information about Doconomy and our products and services to you when you have showed interest in Doconomy; • Doconomy's interest of promoting our products and services; and • Doconomy's interest of knowing what you think about our products and services in order for us to be able to develop and improve our products and services. <p>Sometimes our use of your personal data is for purposes which are ancillary to the provision of our products and services. In those circumstances, we believe we have a legitimate interest in handling your personal data, and believe that the benefits of this storage and use of your personal data will outweigh any potential impact on you and not unduly prejudice your rights or freedoms. The relevant circumstances include:</p>	<p>Sign Up Data and Website Usage Data.</p>

	<ul style="list-style-type: none"> • determining the effectiveness of our promotional campaigns and advertising; • suggesting similar products to you that you may be interested in and to understand which products appeal to our customers; and • where you have opted out of our marketing or objected to receiving e-mails from us, then we need to keep records of your preferences to ensure that we do not contact you if you have asked us not to. 	
<p>We use your personal data to understand how you access and use the Doconomy website to ensure technical functionality of the website, develop new products and services, and analyse your use of the Doconomy website, including your interaction with applications, advertising, products, and services that are made available, linked to, or offered through the Doconomy website.</p>	<p>The processing is carried out on the basis of legitimate interest after a balancing of interests where Doconomy has pursued the following legitimate interests:</p> <ul style="list-style-type: none"> • Doconomy's interest of developing and keeping its products and services up to date; and • Doconomy's interest of knowing what you think about our products and services in order for us to be able to develop and improve our products and services. <p>Sometimes our use of your personal data is for purposes which are ancillary to the provision of our products and services. In those circumstances, we believe we have a legitimate interest in handling your personal data, and believe that the benefits of this storage and use of your personal data will outweigh any potential impact on you and not unduly prejudice your rights or</p>	<p>Website Usage Data.</p>

	<p>freedoms. The relevant circumstances include:</p> <ul style="list-style-type: none"> • keeping our services, products and IT systems secure; and • analysing and enhancing the information that we collect. 	
<p>We may also use your personal data to prevent, detect, investigate and take measures against criminal activity, fraud and misuse of or damage to our website or network or violations of the terms of use for the website or this Privacy Policy and to take measures against other threats against Doconomy's or a third party's rights.</p>	<p>The processing is carried out on the basis of legitimate interest after a balancing of interests where Doconomy has pursued the following legitimate interests:</p> <ul style="list-style-type: none"> • Doconomy's interest of investigating any suspicion of misuse of our website and taking measures against any misuse of the website or any violation against the terms of use for our website or this Privacy Policy; • Doconomy's interest of investigating and producing evidence regarding criminal activity or threat against its interests; • a third party's interest of investigating and proving criminal activity or threat against its interests; and/or • Swedish or foreign authority's interest of conducting law enforcement activities and collecting evidence for such purposes. 	<p>Sign Up Data and Website Usage Data.</p>
<p>We may also use your personal data to comply with applicable laws, regulations, court orders, government</p>	<p>Compliance with a legal obligation to which Doconomy is subject.</p>	<p>Sign Up Data</p>

and law enforcement agencies' requests.		
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8. Sharing of your personal data

We share your personal data with the following categories of recipients under the following circumstances and for the following reasons:

Employees of Doconomy. Our employees will only process your personal data if it is necessary in order for them to carry out their tasks and such employees only process your personal data on our instructions and in accordance with this Privacy Policy. All our employees have committed themselves to confidentiality in relation to the processing of your personal data.

Third party service providers. We share your personal data with third party service providers who assists Doconomy by providing certain services in relation to Doconomy's business and therefore processes personal data on Doconomy's behalf. This will include:

- IT infrastructure providers and hosting providers;
- IT support service providers; and
- other third party service providers such as software providers and service providers, which facilitates or provides certain services in relation to our website.

These third party service providers are authorised to use your personal data only as necessary to provide its services to us and they do not have any independent right to process or share your personal data.

Compliance with laws and legal proceedings. When we respond to court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. When we believe in our sole discretion it is necessary to share information in order to investigate, prevent or take actions against illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person or as otherwise required by law.

Merger or acquisition. When we need to transfer information about you if we are acquired by or merged with another company. If Doconomy are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified afterwards via e-mail and/or a prominent notice on our website of any change in ownership or uses of your personal data, as well as any choices you may have regarding your personal data.

9. Transfer of personal data to a third country

We strive to always choose suppliers established within the EU/EEA. However, sometimes we need to transfer your personal data to suppliers and partners established outside the EU/EEA. Your personal data may, therefore, be subject to privacy laws that are different from those in your country of residence.

The personal data that we collect from you may in limited cases be transferred to and processed in a country outside the EU/EEA (i.e. a so-called third country), including countries which the EU Commission does not consider to have an adequate level of protection for personal data. In such case we will take all necessary steps required under applicable law in order for such transfer of your personal data across borders to be compliant with applicable law. We will only transfer your personal data to a country outside the EU/EEA where; (i) the EU Commission has decided that the third country ensures an adequate level of protection, (ii) the transfer is being safeguarded by the use of EU model clauses (under Article 46.2 in the General Data Protection Regulation (2016/679) ("**GDPR**")) or (iii) the recipient is certified under the US-EU Privacy Shield Framework (under Article 45 in the GDPR). To take part of the mechanisms that we rely upon to safe guard the transfer, please contact us.

10. Data retention and deletion

We keep your personal data only as long as necessary for the purpose of the processing and for legitimate and essential business purposes, such as making data-driven business decisions about new features and offerings, complying with our legal obligations, and resolving disputes. Your personal data is saved for 12 months. Doconomy will not save your personal data after that period in time, unless saving the data is required to comply with legislation or to protect the legal interests of Doconomy (e.g. in connection to an ongoing legal process) and in such event only as long as it is necessary to fulfil the purpose with the continued processing.

11. Third party links and content

The website may include links to websites and services provided and maintained by third parties. Such third party websites and/or services may have their own terms of use and privacy policies and your use of such websites and/or services will be governed by and subject to such terms of use and privacy policies. You should review the terms of use and privacy policy for each website and/or service that you visit/use. You understand and agree that Doconomy does not endorse and is not responsible for the behaviour, features or content of any such third party websites and/or services or for any transaction you may enter into with the provider of any such websites and/or services.

12. Cookies

We use cookies on our website (<https://doconomy.com>), to provide you with the best browsing experience. Cookies help us remember your preferences. The data collected by cookies is used to optimise the website for our visitors and deliver targeted information to Doconomy users and prospective Doconomy customers. Cookies are small text files that are downloaded to your computer's hard drive through your web browser (if you allow it) and that enables the website's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

You can think of cookies like stickers. Every time you visit a website, the website "puts a sticker on you" so they can keep track of how many times you have visited, how long time you have spent there, and what you have done. This lets the website show you things which are relevant to you, based on information you have entered and stuff you have looked at. The length of time stored depends on the cookie, but this is generally between a few minutes and up to two years. Please note that the term cookie actually describes a range of technologies, including, pixel tags (transparent graphic images placed on a website or in an email, which indicate that a page or email has been viewed), mobile device identifiers, and web storage used in desktop software or mobile devices.

There are a few different categories of cookies, including:

First-party cookies. These are cookies set by the website that you are visiting at that time, either by us, or by a third party at our request.

Third-party cookies. These are cookies that are set by a party other than that of the website you are visiting. If you visit the Doconomy website and another party sets a cookie through that website this would be a third-party cookie. These cookies are set by third parties and we do not control how they are set.

Persistent Cookies. These are cookies which stay on your device for a set period of time or until you delete them. Persistent cookies are for example used to remember if a user returns to a website so that the website can push news on the returning user or customize the website to the returning users previous choices in relation to the website.

Session Cookies. Session cookies are created temporarily in your browser's subfolder while you are visiting a website and are automatically deleted when you leave the website. A session cookie could for example be used in order to remember which language a user has chosen on the website.

We and our service providers may use cookies and tracking technologies when you interact with the website for a variety of reasons, as described in detail below.

Strictly Necessary We use cookies and other tracking technologies for system administration, to monitor traffic and prevent fraudulent activity, to improve the security of the website and to provide the basic functionality of the website.

Functionality We use cookies and other tracking technologies to tell us whether you have visited the website before and to make the website easier to use, including remembering your preferences and settings (such as language, text size and font).

Analytics and Performance We use cookies and other tracking technologies to assess the performance of the website, to count visitors to the website, and to monitor how users navigate and use the website, in order to improve the performance of, and content offered through, the website.

Targeting We may use cookies to record your use of our website, the pages you have visited and the links you have followed. We will use this information to make our website more relevant to your interests and in order to make advertising relevant to you and your interests.

The following cookies are used on our website:

Name	Type	Purpose	Retention	First-party cookie	Cookie type
_ga	http-cookie	Used to distinguish users	2 years	First-party	Analytics and Performance (using Google Analytics).

-gid	http-cookie	Used to distinguish users	24 hours	First-party	Analytics and Performance (using Google Analytics).
-gat_gtag_UA_129625451_1	http-cookie	Used to Throttle request rate	1 minute	First-party	Analytics and Performance (using Google Analytics).

You can turn cookies off if you like!

You can withdraw or modify your consent to our use of cookies at any time. You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your web browser settings. Each browser may be different, so look at your browser's Help menu to learn the correct way to modify your cookies. If you disable cookies some features will be disabled and certain functions of the website may not work properly.

13. Changes to this Privacy Policy

Doconomy reserves the right to make changes to this Privacy Policy. Doconomy will, prior to making any material changes to this Privacy Policy provide you with prominent notice as appropriate under the circumstances, e.g. by displaying a prominent notice on our website.

14. Your rights

You have several rights in relation to your personal data, please read the below section carefully to get information on your rights.

Right of access. You have the right to access the personal data processed by us about you and receive a copy of the personal data we process about you, including information about the processing (such as purposes of the processing and recipients to whom the personal data have been or will be disclosed), by requesting a so-called register extract. Please note that if we receive an access request from you we might request further information from you to ensure an efficient handling of your request and to ensure that the information is provided to the right person.

Right to rectification. You have the right to, without undue delay, get incorrect personal data that we process about you corrected. This also includes the right to, taking into account the purpose(s) of the processing, supplement potential incomplete personal data we process about you.

Right to erasure. You have the right to have your personal data deleted without undue delay and Doconomy is obliged to delete your personal data without undue delay if, for example the personal data is no longer necessary in relation to the purpose for which they were collected or otherwise processed, or if you withdraw consent on which the processing is based and where there is no other legal ground for the processing. Please note that we are not obliged to delete the personal data if we can show that the processing is necessary, for example, for compliance with a legal obligation to which Doconomy is subject or the establishment, exercise or defence of a legal claim, or when there are other legitimate grounds to keep the data.

Right to restriction. You have the right to request that Doconomy restricts the processing of your personal data under certain conditions, for example if you contest the accuracy of the personal data, the processing may be restricted for a period enabling Doconomy to verify the accuracy of the personal data or if Doconomy no longer needs the personal data for the purposes of the processing but you require the personal data for the establishment, exercise or defence of legal claims.

Right to object. You have the right to object, on grounds relating to your particular situation, at any time to Doconomy's processing of your personal data if the processing is based on, for example, legitimate interests. If you object to such processing, Doconomy will no longer be entitled to process your personal data based on such legal basis, unless Doconomy can demonstrate compelling legitimate grounds for the processing which overrides your interests, rights and freedom or if it is conducted for the establishment, exercise or defence of a legal claim.

Right to data portability. You have, under certain conditions, the right to receive the personal data concerning you and which you have provided to Doconomy, in a structured, commonly used and machine-readable format and have the right to transmit such personal data to another data controller without Doconomy trying to prevent this, where Doconomy's processing of your personal data is based on your consent or on a contract and the processing is carried out by automated means. You have in such case the right to request that the personal data from Doconomy shall be transmitted directly to another data controller, where technically feasible.

You also have the right to, at any time, withdraw your consent given to Doconomy for the processing of your personal data by sending us an email on privacy@doconomy.com. If you withdraw your consent, please note that this does not affect the lawfulness of the

processing based on your consent before its withdrawal and that Doconomy may, under certain circumstances, have another legal ground for the processing and therefore may be entitled to continue the processing. Please bear in mind that if you withdraw your consent, Doconomy may not be able to provide you the service you have requested and it may not be possible for you to use the website or parts thereof.

You have the right to lodge a complaint with a competent supervisory data protection authority (such as the Swedish Data Protection Authority) in your country of residence, the country you work in or in the country where the alleged infringement has occurred if you believe we have processed your personal data in contrary to applicable data protection legislation.

If you wish to receive a copy of the personal data we process about you, or if you want to exercise any of the above mentioned rights, please contact us on privacy@doconomy.com.