



# Swish Privacy Policy

About Getswish processing of personal data

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# 1. Getswish processing of personal data

Getswish AB, org. number: 556913–7382, Drottninggatan 26, 111 51 Stockholm (“Getswish”) processes personal data both as a personal data assistant and as a personal data controller. Getswish respects your privacy and, regardless of its role, will handle your personal information in accordance with applicable laws and regulations for personal information. This policy will help you understand what personal information Getswish handles in the various roles and how this information is used and protected. The processing of your personal data may involve several parties. This policy only applies to the processing of personal data performed by Getswish and its subcontractors.

## 2. Getswish processing of personal data as a personal data assistant

### 2.1. Your Swish agreement

As a Swish user, you have entered into an agreement with a bank that offers Swish. Your bank collects information about you and is thus responsible for ensuring that your personal information is handled in a legal manner. The banks affiliated with Swish use Getswish and its assistants to Getswish (IT provider for the Swish system) as personal data assistants to process your personal data, for example to ensure efficient Swish functionality, identification and security. As personal data assistants, we store and process a number of your personal data in this context, such as name, mobile number and social security number. Names are required i.a. to be able to display names in the functions private payment request, blocking of senders and in Swish Business app, names are also saved in payment history. Social security number is required when you identify yourself with BankID, to verify your identity and current age conditions.

### 2.2. Access to your mobile phone

In addition to information that you provided to your bank when registering, Swish also uses an identification number to identify your mobile phone for security reasons. To further improve the functionality of the Swish app, you can also choose to provide access to other information, such as:

- Contacts list - to make it easier to send money to your contacts.
- Images and camera - so you can scan or open QR codes.
- Mobile data - so you can use Swish when you are not connected to a wireless network.
- Notifications - enables Swish to send messages to your mobile phone when you e.g. receive a payment.
- Location information - so that Bluetooth can be used to connect the Swish app with e.g. payment terminals.

The above information is only used by the Swish app in your mobile phone. Getswish does not have access to the information.

Via the Swish app, information can be sent to the device where the app is installed, for example in the form of push notifications. In your device's system settings, you can control how you are notified. The information is sent encrypted to the Swish app.

### **2.3. Representative of a legal entity affiliated with Swish**

If you are registered as a Certificate Point Of Contact (CPOC) to handle Swish certificates on behalf of a company (the Company), your personal information (name, social security number, address, e-mail and mobile number) has been submitted by the Company to the bank that the Company has signed Swish agreement with (the Bank). Your information will be processed by the Bank and by assistants hired by the Bank such as Getswish and its sub-assistants (IT providers for the Swish system). The purpose of the processing is primarily to check that you are authorized to handle certificates on behalf of the Company when you log in with a mobile BankID to administer Swish certificates. Furthermore, we may send information about e.g. new functionality, technical documentation and malfunctions for you as a CPOC.

If you are registered as an authorized user (account manager, administrator or as a seller) of Swish Företagsapp for a company (the Company), the name and social security number for all users and for account manager and administrator are also processed mobile numbers and e-mails. Your information has been provided by the Company and will be processed by the bank with which the Company has signed a Swish agreement (the Bank) and by assistants hired by the Bank such as Getswish and its sub-assistants (IT suppliers for the Swish system). The purpose of the treatment is primarily to check that you are authorized to use the Swish Company app on behalf of the Company. Furthermore, we may send information about e.g. functionality in the app and malfunctions for you as a user.

### **2.4. Contact your bank**

Do you have questions regarding the processing of your personal data in connection with Swish as above or wish to exercise your rights, e.g. to receive information about which personal data about you is processed, we ask you to contact your bank or, if applicable, your Company's bank. You can also read the bank's privacy policy / the bank's information about the processing of personal data.

## **3. Getswish processing of personal data as responsible for personal data**

### **3.1. Purpose of personal data processing and legal basis**

Your personal data is processed in accordance with the Data Protection Regulation 2016/679 (EU) ("GDPR"). The processing of your personal data always takes place for certain specific purposes and with a legal basis to support the processing. We will only retain your personal data for as long as is necessary to fulfill the purpose of processing them and to meet applicable legal requirements, including for a period of at least seven years for processing relating to accounting information under the Accounting Act or tax legislation.

### 3.1.1. Certificate Point of Contact

If you have registered the Certificate Point Of Contact (CPOC) to handle Swish certificates on behalf of a technical supplier (TL), your personal information such as name, social security number, address, e-mail and mobile number has been submitted by the Company to Getswish and will be processed by Getswish. Getswish hires sub-assistants to process your personal data (IT providers for the Swish system). The purpose of the processing is to check that you are authorized to handle certificates on behalf of TL when you log in with a mobile BankID to administer Swish certificates. Furthermore, we may send information about e.g. new functionality, technical documentation and malfunctions for you as a CPOC. Getswish is responsible for the processing of your personal data. The treatment is based on a legitimate interest under Article 6 (1) (f) of the GDPR. Getswish's legitimate interest is to ensure authorized access to the Swish certificates and to provide information to the CPOC. The information will be processed as long as you are notified CPOC on behalf of TL and thereafter to all certificates that you have been authorized to administer; order, pick up or block, expired. However, treatment is stopped no earlier than six (6) months after the last procedure you performed as a CPOC.

### 3.1.2. Application for employment

When applying for employment, Getswish and Getswish's assistants (recruitment consultants, including background checks) will process your personal information provided in the recruitment process. This treatment is based on a legitimate interest. Getswish's legitimate interest is to process and respond to applications for employment. Your application for employment will be saved until its current recruitment has been completed, unless you have agreed on a direct question that the documents may be saved for future recruitment needs.

### 3.1.3. Agreement

When you enter into an agreement or are listed as a contact person or equivalent in an agreement with Getswish, or otherwise represent a party in a Swish-related support case or the like, Getswish and Getswish's assistants will process your personal information provided to fulfill the agreement, filing and agreement administration. This processing is based on the fact that the processing is necessary to fulfill an agreement in accordance with Article 6 (1) (b) of the GDPR and in the event that you are only registered as a contact person or equivalent in a legitimate interest. Getswish's legitimate interest in this case is to fulfill Getswish's obligation under the agreement entered into, to archive and otherwise administer the agreement.

We store personal information in agreements entered into during the contract period. Thereafter, we normally save the information for a maximum of 10 years, calculated from the end of the year in which the agreement ends. We do this because of the rules on prescription.

### 3.1.4. General support for you as a Swish user

When you ask questions to Getswish via email, on Swish.nu, or other channels, Getswish and Getswish's assistants will process your personal information provided in order to handle your question. This treatment is based on a legitimate interest. Getswish's legitimate interest is in dealing with and answering questions received. Your information is saved while we process your questions and thereafter for a maximum of 1 year.

### 3.1.5. Registration for newsletters etc.

When you register to receive information about Getswish or our products and services or otherwise contact Getswish via e-mail or otherwise, Getswish and Getswish's assistants (IT providers) will process your personal information provided for the purpose in question, i.e. provide ordered information to you or handle your request or equivalent. This treatment is also based on a legitimate interest. Getswish's legitimate interest is to provide ordered information or handle your request. If you have registered for information, your information will be deleted as soon as you have deregistered / reported that you no longer wish to receive the information. For other contacts, your information will be deleted as soon as the case is closed.

## 3.2. Personal data provided to third parties

When your personal information is provided to sub-assistants who act on behalf of Getswish, it is done according to a special assistant agreement. We may also transfer your personal information if required by law or regulation. For example, we may be required to provide information to the police, tax authority or supervisory authority.

## 3.3. Integrity and security

The protection of your personal data is important to us and we have therefore taken extensive technical and organizational security measures to protect your data against unauthorized disclosure, alteration or destruction. Our employees and assistants have strict instructions to handle all personal data in accordance with applicable laws and regulations for personal data. We process your personal data within the EU / EEA. In exceptional cases, however, we may transfer personal data to countries outside the EU and the EEA (also called third countries). We only make such transfers if the other rules in the Data Protection Ordinance are complied with and if any of the following conditions are met:

- The European Commission has decided that there is an adequate level of protection in the country in question.
- We have taken other appropriate safeguards, such as standard contractual clauses or binding corporate rules.
- There is a special permit from the supervisory authority, or
- This is permitted in special cases in accordance with current data protection legislation.

### 3.4. Your rights

According to data protection legislation, you have the right to control your own personal data and receive information about how Getswish processes data about you as a personal data controller. You have the right to receive information about which personal data about you that we process. You can get this by requesting a register extract from us. Requests for such information must be made in writing. The request must be sent to Getswish AB, Drottninggatan 26, 111 51 Stockholm.

Furthermore, you have the right to request correction, supplementation or deletion of your personal data. In some cases, we can not delete all the data. In that case, it is because the data are still necessary for the original purpose and we still have a legal basis for processing them. In certain situations, you have the right to demand that our processing of your data be limited for a period of time. This could be, for example, if you believe that information about you is incorrect and we need to check this. It may also be if you have objected to treatment that we base on legitimate interest. Then we must check whether our reasons outweigh yours. If it is technically possible, you also have the right to have the data transferred to another actor. This is called data portability. If you have a complaint about how we have processed your personal data, you can contact the supervisory authority. In Sweden, it is the Data Inspectorate. Read more on Datainspektionen's website [www.datainspektionen.se](http://www.datainspektionen.se). If our processing of your personal data is based on your consent, you can withdraw your consent at any time.

### 3.5. Contact us

If you have any questions regarding this privacy policy, or would like further information, do not hesitate to contact Getswish AB, send an e-mail to [admin@getswish.se](mailto:admin@getswish.se) or send a letter to the above address.