



Swish Privacy Policy

About Swish 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 processor and as controller. Getswish respects your privacy and will, regardless of your role, handle your personal data in accordance with applicable laws and regulations for personal data. This policy helps you understand what personal data 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 applies only to the processing of personal data that Getswish and its subcontractors perform.

2. Getswish processing of personal data as personal data processor

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 therefore responsible for the legal processing of your personal data. The banks affiliated with Swish use Getswish and Getswish’s sub-contractors (IT provider for the Swish system) for the processing of your personal data, for example to ensure efficient Swish functionality, identification and security. As personal data processor we store and process your personal data in this context, such as names, mobile numbers and social security numbers. Names are required partly in order to be able to display names in the function Private payment request, when blocking a sender, in the Swish Company app, and in the payment history. Social security numbers are 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 at registration, Swish also uses an identification number to identify your mobile for security reasons. To further enhance the functionality of the Swish app, you can also choose to provide access to other information, such as:

- List of contacts - to make it easier to send money to your contacts.
- Pictures 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 - allows Swish to send messages to your mobile phone when, for example, you receive a payment.
- Location information - so that Bluetooth can be used to pair the Swish app with e.g. payment terminals.

The above information is only used by the Swish app on your mobile phone. Getswish cannot access 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 legal person connected to 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 details (name, social security number, address, e-mail and mobile number) have been provided 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 its personal data processors such as Getswish and Getswish's sub-contractors (IT providers for the Swish system). The purpose of the processing is primarily to verify that you are authorized to manage certificates on behalf of the Company when you log in with mobile BankID to administer Swish certificates. Furthermore, we may send information about e.g. new functionality, technical documentation and operational disruptions to you as a CPOC.

If you are registered as an authorized user (account manager, administrator or as a seller) of the Swish Company app on behalf of a company (the Company), your name and social security number is registered. For the account manager and administrator, mobile numbers and e-mails are also registered. Your information has been provided by the Company and will be processed by the bank with which the Company has signed the Swish agreement (the Bank) and by its personal data processors such as Getswish and Getswish's sub-contractors (IT providers for the Swish system). The purpose of the treatment is primarily to verify that you are authorized to use Swish Company App on behalf of the Company. Furthermore, we may send information about e.g. functionality of the app and disruptions to you as a user.

2.4. Contact your bank

Do you have questions regarding our processing of your personal data as described above, or wish to exercise your rights, e.g. get information about what personal information about you is processed, we ask you to contact your bank or, where applicable, your Company's bank. You can also view the bank's privacy policy / the bank's information on processing personal data.

3. Getswish processing of personal data as personal data controller

3.1. Purpose of processing personal data and legal basis

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

3.1.1. Certificate Point of Contact

If you are registered as 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 provided by the Company to Getswish and will be processed by Getswish. Getswish hires sub-contractors to process your personal data (IT providers for the Swish system). The purpose of the processing is to verify that you are authorized to manage certificates on TL's behalf when you log in with mobile BankID to administer Swish certificates. Furthermore, we may send information about e.g. new functionality, technical documentation and operational disruptions to you as a CPOC. Getswish is the data controller for the processing of your personal data. The treatment is based on a legitimate interest under Article 6.1 f GDPR. Getswish's legitimate interest consists of securing authorized access to the Swish certificates and providing information to the CPOC. The data will be processed as long as you are registered as CPOC on behalf of a TL and thereafter for as long as all certificates which you have had authority to administer; order, fetch and block, have expired. The processing will however not stop until six months have elapsed since the last activity you have performed as a CPOC.

3.1.2. Employment application

When applying for employment, Getswish and Getswish's sub-contractors/processors with which we are sharing your information (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 consists of processing and responding to received applications for employment. Your application for employment will be saved until the current recruitment is completed unless you, on direct enquiry, consented to the documents being saved for future recruitment needs.

3.1.3. Agreements

When you enter into an agreement or are designated as a contact person or equivalent in an agreement with Getswish, Getswish and Getswish's sub-contractors/processors with which we are sharing your information (e.g. IT Providers) will process your personal information provided to fulfill the entered into agreement, as well as filing and contract administration. This treatment is based on the fact that the treatment is necessary to fulfil agreements in accordance with Article 6.1 b GDPR and in case you are only registered as a contact person or the equivalent of a legitimate interest. In this case, Getswish's legitimate interest consists of fulfilling Getswish's commitment under the agreement entered into and filing and otherwise administering the agreement.

Getswish save personal data in signed agreements during the term of the agreement. After that, we normally save the data for a maximum of 10 years, to the end of the year the agreement ends according to current rules of prescription.

3.1.4. Registration for newsletters etc.

When you register to receive information about Getswish or our products and services or otherwise contact Getswish via email or otherwise, Getswish and Getswish's sub-contractors/processors with which we are sharing your information (e.g. IT Providers) will process your personal information provided for that purpose, 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 consists of providing ordered information or handling your request. If you have registered for information, your information will be deleted as soon as you have unregistered / registered that you no longer wish to receive the information. For other contacts, your information is deleted as soon as the case is closed.

3.2. Personal data provided to third parties

When your personal data is submitted to the sub-contractors who act on Getswish's behalf, this is done under a special personal data processing agreement. We may also transfer your personal data if required by law or regulation. For example, we may be required to provide information to the police, tax authority or regulatory 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 information against unauthorized disclosure, alteration or destruction. Getswish employees and sub-contractors have strict instructions for handling 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 of the Data Protection Regulation 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 concerned.
- We have taken other appropriate safeguards, such as standard contract clauses or binding corporate stipulations.
- Special permission has been obtained from a supervisory authority, or
- It is permissible in special cases under applicable data protection legislation.

3.4. Your rights

According to data protection legislation, you have the right to control your own personal data and get information about how Getswish as controller, processes your personal data. You have the right to receive information about what personal data about you that we process. You can obtain this by requesting a register extract from us. Requests for such information must be made in writing. The request should 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 cannot delete all the data. This is because the information is still necessary for the original purpose and we still have a legal basis for processing it. In some situations, you have the right to demand that our processing of your data be restricted for a period of time. This may be, for example, if you believe that a statement about you is incorrect and we need to verify this. It may also be if you have objected to treatment that we based on legitimate interest. Then we must check if our reasons outweigh yours. If technically possible, you also have the right to have the data transferred to another player. 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 Protection Authority (Datainspektionen). Read more on the Data Protection Authority's website 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, please do not hesitate to contact Getswish AB, send an e-mail to admin@getswish.se or send a letter to the above address.