



## NOTICE

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

### 1. What does this Privacy Notice cover?

The protection of personal data is important to the Nets Denmark A/S (hereinafter collectively 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 Nets Easy checkout window, (ii) when you activate “Save my Details”, (iii) when we onboard you to Nets Easy service and (iv) when you use Nets Easy 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 Nets Easy, 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?
<b>Checkout</b>	When you provide your payment information at the checkout when purchase goods or services online from any of the merchants in our network.	<p>Categories of personal data processed is dependent on the data required for the chosen payment method.</p> <ul style="list-style-type: none"> <li>• Payment details (card number, expiration date, CVC code, IBAN number, and other information required by the 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 (only for “Pay later” solutions).</li> <li>• Contact information (email address, address, telephone number, company registration number).</li> <li>• Transaction information (time and amount of transaction, type of payment transaction (e.g., pin/chip, CNP (eCom)).</li> <li>• IT information (IP address, web browser information and other unique identifier of device etc.).</li> </ul>	The purpose of processing is to facilitate payment between you as the payer and the merchant via Nets Easy Checkout.	<p>The processing is necessary for the performance of a contract for verification and execution of your payment.</p> <p>The processing is necessary for the purposes of the legitimate interests pursued by us to fulfil our contractual obligations when offering Nets Easy 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, e.g., transaction data will be stored for five years in accordance with Anti-Money Laundering regulations.
<b>Save my Details</b>	When you activate the functionalities chosen in “Save my Details”.	<ul style="list-style-type: none"> <li>• Contact information (name, delivery and invoice addresses, email address, phone number).</li> <li>• Payment details (card number, expiration date, CVC and</li> </ul>	The purpose of processing is to store your payment and delivery information in order to facilitate subsequent payments and checkout.	You consent to processing your personal data for this specific purpose.	N/A	The data will be retained 12 months after payment method has last been used, or until the

		other information required by Payment Processor, e.g. national identification number for “Pay Later” payment solution.				consent is withdrawn.
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## 2.2 Merchant and partner

If you are a merchant offering payments via Nets Easy 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?
<b>Nets Easy Portal</b>	When you create a user account in the self-service Easy portal.	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Company registration number</li> <li>Merchant number</li> <li>Email address</li> <li>Telephone number</li> <li>Language preferences</li> <li>IP address</li> <li>Username/unique ID</li> <li>Payment information (transaction time and amount, bank account number (including IBAN))</li> </ul>	<p>The purpose of processing personal data is to:</p> <ol style="list-style-type: none"> <li>enable you to self-configure your users in the portal.</li> <li>enable you to establish structured overviews of payments made by end users via their web shop and</li> <li>establish a payout overview for you.</li> </ol>	<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 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>	Partners upon your permission.	<p>We retain your personal data for two years after the termination of your agreement with us.</p> <p>We retain your transaction data for two years after the last transaction was made, unless otherwise required under Anti-Money Laundering regulations.</p>
<b>Sign-up process</b>	When you provide your personal data in context to sign-up to Nets Easy.	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Email address</li> <li>Company registration number</li> <li>Merchant number</li> <li>Card turnover</li> <li>Industry category</li> <li>Organisational information.</li> </ul>	The purpose of processing personal data is to sign you up to Nets Easy 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	<p>Once an application is approved or rejected, your data will be deleted after one month.</p> <p>When an application did not reach approved or</p>

						rejected state, your data will be deleted after three months.
<b>Onboarding process</b>	When we process your personal data in order to onboard you to Nets Easy upon signing of a contract with us.	<ul style="list-style-type: none"> <li>• Company information (company registration number, organisational information, ownership information, Industry category, IBAN number, SWIFT/BIC, Merchant number)</li> <li>• Financial and credit information (card turnover, card scheme screening)</li> <li>• Contact information (name, email address, home address (e.g., beneficial owners), work address, telephone number)</li> <li>• Language preferences</li> <li>• 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)</li> </ul>	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	We retain your personal data for five years after the termination of the agreement.
<b>Invoicing</b>		<ul style="list-style-type: none"> <li>• Contact information (name, email address, address, telephone number, title)</li> <li>• Company information (company registration number, organisational information, ownership information, Industry category, IBAN number, SWIFT/BIC, Merchant number, user name/Unique ID)</li> <li>• Transaction amount</li> </ul>	The purpose of processing personal data is to issue invoices for using Nets Easy.	<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 the Nets to receive payments for provided the services.</p>	Personal data is shared with debt collection companies to enable those to perform the dunning and debt collection on behalf of Nets.	Depending on jurisdiction, we retain accounting records, incl. invoices for a limited period, e.g., 10 years under bookkeeping laws.
<b>Marketing</b>	<p>Please refer to our General Nets Privacy Notice <a href="#">here</a>.</p> <p>In this privacy notice, you will find the description of our marketing activities.</p>					

### 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?
<b>Statistics and business development</b>	Please refer to our General Nets Privacy Notice <a href="#">here</a> . In this privacy notice, you will find the description of our statistics and business development activities.					
<b>Complaints and dispute handling</b>	General Nets Privacy Notice <a href="#">here</a> . In this privacy notice, you will find the description of our complaint and dispute handling activities.					

### 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 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, cloud solution.
- 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.

In the event such suppliers have access to personal data collected or processed by us, the supplier 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 Group 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.

## 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](mailto:dpo.nets@nexigroup.com) or by submitting your request here:

[www.nets.eu/gdpr/dsr](http://www.nets.eu/gdpr/dsr)

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](http://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](mailto:dpo.nets@nexigroup.com)

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

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