

# QLIRO'S PRIVACY POLICY

This privacy policy explains how Qliro AB ("Qliro", "we," or "us") collects and uses your personal data when you use Qliro's services or otherwise interact with us. This privacy policy also describes your rights towards us and how you can exercise those rights. You can always contact us with questions regarding privacy and data protection; see our contact information in section 1 below.

**Qliro is the data controller for your personal data**, and we process your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR"). We encourage you to read this privacy policy in its entirety to ensure you fully understand how we process your personal data in connection with providing our services. Qliro is a credit market company under the supervision of the Swedish Financial Supervisory Authority.

Personal data means any information relating to you as a data subject that can identify you, directly or indirectly, such as name, email address and identification number. Processing means any operation which is performed on personal data, such as collection, use, adaptation, organisation, or storage of person data.

## 1. CONTACT DETAILS OF THE DATA CONTROLLER

<b>Company Name:</b>	Qliro AB
<b>Organization Number:</b>	556962-2441
<b>Mailing Address:</b>	Sveavägen 151 113 46 Stockholm
<b>Phone Number:</b>	800 69 300
<b>Email:</b>	<a href="mailto:kundeservice@qliro.com">kundeservice@qliro.com</a>
<b>All contact channels (incl. chat):</b>	<a href="https://www.qliro.com/nb-no/kontakt-oss">https://www.qliro.com/nb-no/kontakt-oss</a>

## 2. WHAT INFORMATION DO WE COLLECT?

### 2.1. PERSONAL DATA YOU PROVIDE TO US

We process personal data that you provide to us, and personal data generated when you use our products and services. You may directly or indirectly provide us with the following categories and types of personal data:

Category of Personal Data	Type of Data Point/Personal Data
<i>Used in section 3 below</i>	
<b>Identification Data</b>	Name, birth date, social security number, and necessary identifiers when logging in with eID, etc.
<b>Contact Data</b>	Email address, billing and delivery address, phone number, etc.
<b>Financial Information</b>	Information about your income, any credits, balance on savings and credit accounts, negative payment history, information about payments such as invoice information, external and internal payment, credit history (from credit checks), payout account, transaction history, transaction category, etc.
<b>Generated Information</b>	Information on how you use our products and services, including user ID, cookies showing how you reached the product/service, usage patterns in the Qliro app and on our website, etc.

	Generated information can also include information you provide when you communicate with us, such as recordings from phone calls with us or communication via any of our digital channels, etc.
<b>Information about Goods/Services</b>	Details regarding the goods/services you have purchased from merchants, the merchant where the purchase was made, as well as product information and other details about your order, etc.
<b>Device Information</b>	Information about your device, such as language settings, IP address, time zone, and your geographical information.
<b>Information Required by Law</b>	<p>Personal data required for basic or enhanced customer knowledge and anti-money laundering and prevention of other crimes, information about tax residence, etc.</p> <p><i>Information required by law can be retrieved from or compared with data from the Tax Agency, sanction lists, or compilations of politically exposed persons (PEP) to prevent, for example, money laundering.</i></p>

## 2.2. PERSONAL DATA WE OBTAIN AND PROCESS FROM THIRD PARTIES

In some cases, your personal data is obtained from a third party to complement or verify that your personal data is current or to ensure that your personal data is correct, e.g., through a credit check. The following categories of personal data are obtained from third parties:

<b>Category of Personal Data</b>	<b>Type of Data Point/Personal Data and Providing Third Party</b>
<i>Used in section 3 below</i>	
<b>Identification Data</b>	<p>Name, birth date, personal ID number, and necessary identifiers when logging in with eID, etc.</p> <p><i>Your identity details can be received from merchants connected to our services and you are logged in with, as well as public and other available sources such as the Tax Agency's population register and government personal address registers.</i></p>
<b>Contact Data</b>	<p>Email address, billing and delivery address, phone number, etc.</p> <p><i>Your contact details can be received from merchants connected to our services and you are logged in with, as well as public and other available sources such as the Tax Agency's population register and government personal address registers.</i></p>
<b>Financial Information</b>	<p>Information about your income, any credits, balance on savings and credit accounts, negative payment history, information about payments such as invoice information, external and internal payment, credit history (from credit checks), payout account, transaction history, transaction category, etc.</p> <p><i>Your financial information can be received from credit reporting companies or credit registers when we need to assess your creditworthiness and confirm your identity.</i></p>
<b>Information Required by Law</b>	<p>Personal data required for basic or enhanced customer knowledge and anti-money laundering or prevention of other crimes, information about tax residence, etc.</p> <p><i>Information required by law can be retrieved from or compared with data from the Tax Agency, sanction lists, or compilations of politically exposed persons (PEP) to prevent, for example, money laundering.</i></p>

## 3. WHAT DO WE DO WITH YOUR PERSONAL DATA?

In the tables below you will find information about:

Qliro AB (publ)

Org.no: 556962-2441

Corporate domicile: Stockholm

Qliro.com

Page 2 of 18

1. the purposes of processing your personal data,
2. the categories of personal data we use for each purpose,
3. the legal basis under GDPR for processing your personal data, i.e., why the processing is necessary, and
4. the storage period for each processing action, i.e., how long Qliro retains the personal data for each purpose.

### 3.1. WHEN YOU CONTACT US THROUGH OUR COMMUNICATION CHANNELS

When you contact us by phone, email, our chat, or social media, we collect the personal data you provide to us to respond to your inquiry, manage your case, or otherwise interact with you.

Purpose of Processing	Category of Personal Data (see clarification in section 2 above)	Legal Basis for Processing (why the processing is necessary)	Storage Period
When you are in contact with our customer service by phone, email, or our chat, we process your personal data to administer and manage your customer service case with us.	Identification Data Contact Data Financial Information Device Information (only when you contact us via our chat function)	We base our processing on Article 6.1 (b) GDPR (contract with you as the data subject).  The processing is necessary to administer and manage your customer service case with us and thereby fulfil the agreement you are a party to.	To fulfil the agreement you are a party to, Qliro stores your personal data for three (3) years in operational systems and a maximum of ten (10) years after the agreement has ended according to prescription rules. Thereafter, the personal data is deleted.
When you are in contact with our customer service by phone, the call is recorded for the purpose of training our employees, improving our voice response and our working methods.	Identification Data Contact Data Financial Information Generated information	We base our processing on Article 6.1 (f) GDPR (legitimate interest). We have a legitimate interest in processing your personal data to improve our customer service to help you in the best way in future customer service cases.  After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. The processing is also considered necessary to achieve the purpose.	We process your personal data for one (1) year. Thereafter, the personal data is deleted.
When you are in contact with our customer service by email or our chat, the correspondence with you is saved for the purpose of training our employees, improving our response and our working methods.	Identification Data Contact Data Financial Information Generated information	We base our processing on Article 6.1 (f) GDPR (legitimate interest). We have a legitimate interest in processing your personal data to improve our customer service to help you in the best way in	We process your personal data for two (2) years. Thereafter, the personal data is deleted.

	Device Information (only when you contact us via our chat function)	<p>future customer service cases.</p> <p>After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. The processing is also considered necessary to achieve the purpose.</p>	
When you are in contact with us on our social media channels, we process your personal data to answer your questions or interact with you.	<p>Identification Data</p> <p>Contact Data</p> <p>Generated information</p>	<p>We base the processing on Article 6.1 (f) GDPR (legitimate interest). We have a legitimate interest in processing your personal data to be able to answer your questions and interact with you in our social media channels.</p> <p>After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. The processing is also considered necessary to achieve the purpose.</p>	We process your personal data for two (2) years. Thereafter, the personal data is deleted.

### 3.2. WHEN YOU MAKE A PURCHASE ON A MERCHANT'S WEBSITE THROUGH QLIRO'S CHECKOUT

When you make a purchase from a merchant connected to payment services provided by Qliro, we collect the personal data you provide to us when you complete a purchase through Qliro's checkout.

In these contexts, Qliro collects and processes your personal data in order to provide you with our products and services for payments, thereby fulfilling the agreement you have entered into with us.

Purpose of Processing	Category of Personal Data (see clarification in section 2 above)	Legal Basis for Processing (why the processing is necessary)	Storage Period
When you make a purchase from a merchant connected to payment services provided by Qliro, we process your personal data in the checkout to provide you with our products and services for payments.	<p>Identification Data</p> <p>Contact Data</p> <p>Financial Information</p> <p>Information about Goods/Services</p> <p>Generated information</p> <p>Device Information</p>	We base our processing on Article 6.1(b) GDPR (contract with you as a data subject). The processing is necessary to provide you with our services, i.e., to administer and manage your purchase from one of our connected merchants, thereby fulfilling the contract you are a party to.	<p>To fulfil the contract you are a party to, Qliro stores your personal data for three (3) years in operational systems and up to ten (10) years after the contract has ended, according to limitation rules. Thereafter, the personal data is deleted.</p> <p>To the extent the personal data is processed to meet</p>

		<p>Additionally, we have a statutory obligation to compile bookkeeping and accounting and to retain this information according to the Book-keeping Act (1999:1078), for which we also base our processing on Article 6.1(c) GDPR regarding our fulfilment of a legal obligation.</p>	<p>our legal obligations under Book-keeping Act (1999:1078), Qliro stores your personal data while the bookkeeping is compiled and seven (7) years after the end of the year the data was recorded.</p>
<p>When you pay with one of Qliro's payment methods (e.g., 14-day invoice, Buy Now Pay Later, or Fixed/Flexible payments) or with another payment method offered at the checkout, we process your personal data to provide you with our payment methods.</p>	<p>Identification Data</p> <p>Contact Data</p> <p>Financial Information</p> <p>Generated information</p> <p>Device Information</p>	<p>We base our processing on Article 6.1(b) GDPR (contract with you as a data subject). The processing is necessary to provide you with our services, i.e., to enable your use of our payment solutions, thereby fulfilling the contract you are a party to.</p> <p>Additionally, we have a statutory obligation to comply with consumer protection legislation (including acting in accordance with good credit practices) and to compile bookkeeping and accounting and retain this information according to the Book-keeping Act (1999:1078), for which we also base our processing on Article 6.1(c) GDPR regarding our fulfilment of a legal obligation.</p>	<p>To fulfil the contract you are a party to, Qliro stores your personal data for three (3) years in operational systems and up to ten (10) years after the contract has ended, according to limitation rules. Thereafter, the personal data is deleted.</p> <p>To the extent the personal data is processed to meet our legal obligations under the Book-keeping Act (1999:1078), Qliro stores your personal data while the bookkeeping is compiled and seven (7) years after the end of the year the data was recorded.</p>

### 3.3. WHEN YOU INTERACT WITH OUR FINANCIAL SERVICES

When you interact with our financial services by opening a savings account, applying for a loan, or paying an invoice, Qliro collects and processes your personal data in order to provide you with our financial services and thereby fulfil the agreement you have entered into with us.

Purpose of Processing	Category of Personal Data <i>(see clarification in section 2 above)</i>	Legal Basis for Processing <i>(why the processing is necessary)</i>	Storage Period
When you open a savings account with us, we process your personal data to provide you with our services.	<p>Identification Data</p> <p>Contact Data</p> <p>Financial Information</p>	<p>We base our processing on Article 6.1(b) GDPR (contract with you as a data subject). The processing is necessary to provide you with our services, i.e., to open a savings account</p>	<p>To fulfil the contract you are a party to, Qliro stores your personal data as long as you use our services and for a maximum of 10 years after the contract has ended,</p>

	Information Required by Law	<p>for you and thereby enter into and fulfil the contract you are a party to.</p> <p>Additionally, we have a statutory obligation to establish our customers' identity according to the Act on Measures against Money Laundering and Terrorist Financing (2017:630) and a statutory obligation to compile bookkeeping and accounting and retain this information according to the Book-keeping Act (1999:1078). For these reasons, we also base our processing on Article 6.1(c) GDPR regarding our fulfilment of a legal obligation.</p>	<p>according to limitation rules. Thereafter, the personal data is deleted.</p> <p>To fulfil our legal obligations under the Act on Measures against Money Laundering and Terrorist Financing (2017:630), Qliro stores your personal data for five (5) years and in special situations, if requested by an authority, for ten (10) years. Thereafter, the personal data is deleted.</p> <p>To fulfil our legal obligations under the Book-keeping Act (1999:1078), Qliro stores your personal data for seven (7) years. Thereafter, the personal data is deleted.</p>
<p>When you apply for a loan with us, we process your personal data to provide you with our services.</p> <p>We also collect information to assess your creditworthiness. Read more under section 3.4. <i>When we collect information about your creditworthiness</i> below.</p>	<p>Identification Data</p> <p>Contact Data</p> <p>Financial Information</p> <p>Information Required by Law</p>	<p>We base our processing on Article 6.1(b) GDPR (contract with you as a data subject). The processing is necessary to provide you with our services, i.e., to offer you a loan and thereby enter into and fulfil the contract you are a party to.</p> <p>Additionally, we have a statutory obligation to establish our customers' identity according to the Act on Measures against Money Laundering and Terrorist Financing (2017:630), a statutory obligation to comply with consumer protection legislation (including acting in accordance with good credit practices), and a statutory obligation to compile bookkeeping and accounting and retain this information according to the Book-keeping Act (1999:1078). For these reasons, we also base our processing on Article 6.1(c) GDPR regarding our fulfilment of a legal obligation.</p>	<p>To fulfil the contract you are a party to, Qliro stores your personal data for a maximum of 10 years after the contract has ended, according to limitation rules. Thereafter, the personal data is deleted.</p> <p>To fulfil our legal obligations under the Act on Measures against Money Laundering and Terrorist Financing (2017:630), Qliro stores your personal data for five (5) years and in special situations, if requested by an authority, for ten (10) years. Thereafter, the personal data is deleted.</p> <p>To fulfil our legal obligations under the Book-keeping Act (1999:1078), Qliro stores your personal data for seven (7) years. Thereafter, the personal data is deleted.</p>

When you pay an invoice with us, we process your personal data to complete your invoice payment.	Identification Data	We base our processing on Article 6.1(b) GDPR (contract with you as a data subject). The processing is necessary to provide you with our services, i.e., to complete your invoice payment and thereby enter into and fulfil the contract you are a party to.  Additionally, we have a statutory obligation to comply with consumer protection legislation (including acting in accordance with good credit practices) and to compile bookkeeping and accounting and retain this information according to the Book-keeping Act (1999:1078), for which we also base our processing on Article 6.1(c) GDPR regarding our fulfilment of a legal obligation.	To fulfil the contract you are a party to, Qliro stores your personal data for three (3) years in operational systems and for a maximum of 10 years after the contract has ended, according to limitation rules. Thereafter, the personal data is deleted.  To fulfil our legal obligations under the Book-keeping Act (1999:1078), Qliro stores your personal data for seven (7) years. Thereafter, the personal data is deleted.
	Contact Data  Financial Information		

### 3.4. WHEN WE COLLECT INFORMATION ABOUT YOUR CREDITWORTHINESS

When you apply for a loan with us or pay using one of Qliro's payment methods (e.g., 14-day invoice, Buy Now Pay Later, or Fixed/Flexible payments), Qliro collects information about your creditworthiness from credit reporting companies to determine your ability to fulfil the payment. This personal data processing is necessary for us to provide you with our financial services and thereby fulfil the agreement you have entered into or intend to enter into with us.

Purpose of Processing	Category of Personal Data (see clarification in section 2 above)	Legal Basis for Processing (why the processing is necessary)	Storage Period
<p>To determine which payment methods we can offer you, we collect and process personal data about you for this purpose.</p> <p>We collect financial information about you from third parties to determine which payment methods we can offer you, including from credit reporting companies and credit registers. Financial information about provided credits and loans, payment defaults, and credit abuse is also shared with credit reporting companies and credit registers.</p> <p>Qliro uses automated decisions when you apply</p>	<p>Identification Data</p> <p>Contact Data</p> <p>Financial Information</p> <p>Generated information</p>	<p>We base our processing on Article 6.1(b) GDPR (contract with you as a data subject). The processing is necessary to provide you with our financial services, i.e., to give you credit and loans and thereby fulfil the contract you are a party to.</p> <p>Additionally, in certain cases, we base our processing on Article 6.1(f) GDPR (legitimate interest). We have a legitimate interest in processing your personal data for the purpose of preventing fraud.</p> <p>After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in</p>	<p>To fulfil the contract you are a party to, Qliro stores your personal data for three (3) years in operational systems and for a maximum of ten (10) years after the contract has ended, according to limitation rules. Thereafter, the personal data is deleted.</p>

<p>for credit by choosing Qliro's payment method in the checkout or applying for a personal loan. You have the right to express your opinion and contest the decision as well as request that a human reviews and reconsiders the decision.</p> <p>When you apply for credit, Qliro processes your personal data for profiling, which is a procedure that may involve a series of statistical conclusions to assess certain personal characteristics. By processing your personal data, your creditworthiness or so-called "profile" is determined. Automated decisions to approve or deny your credit application are made based on your profile. If you do not meet the basic criteria according to the respective product terms, a decision to deny the requested credit will be made automatically. Automated decisions to deny a credit application can also be made based on your profile for fraud prevention.</p>		<p>not having your personal data processed. We further assess that the processing is necessary to achieve the purpose.</p> <p>Additionally, we have a statutory obligation to comply with consumer protection legislation (including acting in accordance with good credit practices) for which we also base our processing on Article 6.1(c) GDPR regarding our fulfilment of a legal obligation.</p>	
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### 3.5. WHEN YOU INTERACT WITH OUR DIGITAL SERVICES

When you interact with our digital services, i.e., our website Qliro.com or the Qliro app, Qliro collects and processes your personal data in order to provide you with our digital services and to prevent fraud and misuse of our services.

We use **cookies and similar tracking technologies** to enhance the seamlessness and improve the user experience of our digital services. You can find more information about how we use cookies in our cookie policy, which you can read by following this link: <https://www.qliro.com/nb-no/juridisk/cookies>

Purpose of Processing	Category of Personal Data (see clarification in section 2 above)	Legal Basis for Processing (why the processing is necessary)	Storage Period
When you visit our website Qliro.com or the Qliro app and are logged in, we process your personal data to visually	Identification Data Contact Data Financial Information	We base our processing on Article 6.1 (b) GDPR (contract with you as the data subject). The processing is necessary to provide our services to you, i.e., to grant you access to our	To fulfil the contract to which you are a party, Qliro stores your personal data for three (3) years. Thereafter, the personal data is deleted from our

present and provide our services to you there.	Generated information Device Information	website and the Qliro app and thereby enter into and fulfil the contract to which you are a party.	website Qliro.com and the Qliro app.
When you visit our website Qliro.com or the Qliro app, we process your personal data to improve and customize your user experience, ensure that the content is presented correctly for you and the device you use, as well as for troubleshooting, quality assurance, and testing.	Generated information Device Information	<p>We base our processing on Article 6.1 (f) GDPR (legitimate interest). We have a legitimate interest in processing your personal data to improve the user experience on our website and in the Qliro app.</p> <p>After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. We also consider the processing necessary to achieve the purpose.</p>	We process your personal data for a maximum of one (1) year. Thereafter, the personal data is deleted or anonymized.
When you visit our website Qliro.com or the Qliro app, we process your personal data to prevent, detect, and stop fraud, such as someone unauthorized making a purchase in your name, a clearly altered behaviour, or to prevent misuse of our services so that they are safe and secure for you.	Identification Data Contact Data Financial Information Generated information Information Required by Law	<p>We base our processing on Article 6.1 (f) GDPR (legitimate interest). We have a legitimate interest in processing your personal data to prevent fraud or misuse of our services.</p> <p>After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. We also consider the processing necessary to achieve the purpose.</p> <p>Additionally, we have a legal obligation to, among other things, manage and report suspected and confirmed fraud, which is why we also base our processing on Article 6.1 (c) GDPR regarding our fulfilment of a legal obligation.</p>	<p>We process your personal data for three (3) years. Thereafter, the personal data is deleted.</p> <p>To fulfil our legal obligations, Qliro in some cases stores your personal data for five (5) years. Thereafter, the personal data is deleted.</p>
When you visit our website Qliro.com or the Qliro app, we process your personal data to	Device Information	We base our processing on Article 6.1 (f) GDPR (legitimate interest). We have a legitimate interest in	We process your personal data for one (1) year. Thereafter, the personal

manage, analyse, and prevent risks regarding information security/cybersecurity.		processing your personal data to manage and analyse risks.  After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. We also consider the processing necessary to achieve the purpose.	data is deleted or anonymized.
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### 3.6. WHEN WE COMMUNICATE WITH YOU

We may use your personal data to communicate relevant information and marketing about the products and services you use or similar products and services that we offer, as well as to conduct market and customer satisfaction surveys and analyses via email, mail, phone calls, or SMS. If you want to object to such processing, you have the right to do so; read more in section 4.7 below.

Purpose of Processing	Category of Personal Data (see clarification in section 2 above)	Legal Basis for Processing (why the processing is necessary)	Storage Period
To market our services and develop our business operations, we process your personal data for these purposes.	Identification Data  Contact Data  Generated information	We base our processing on Article 6.1 (f) GDPR (legitimate interest). We have a legitimate interest in processing your personal data to market our services and develop our business operations.  After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. We also consider the processing necessary to achieve the purpose.	We process your personal data for one (1) year. Thereafter, the personal data is deleted.

### 3.7. WHEN YOU USE AUTOFIL IN THE CHECKOUT

When you use the autofill function in the checkout, Qliro may place a cookie on your device to enable autofill of your login.

Purpose of Processing	Category of Personal Data (see clarification in section 2 above)	Legal Basis for Processing (why the processing is necessary)	Storage Period
With “automatic login with the same device” in the settings for autofill in the checkout, Qliro places a cookie on your device. We process your personal data through cookies to enable	Generated information	We base our processing on Article 6.1 (f) GDPR (legitimate interest). We have a legitimate interest in processing your personal data to make your user experience	We process your personal data for automatic login with the same device for sixty (60) days after you last used the checkout.

automatic login the next time you visit the checkout with the same device.		<p>easier through the autofill function.</p> <p>After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. We also consider the processing necessary to achieve the purpose.</p> <p>If you do not want to be automatically logged in the next time you visit the checkout with the same device, you can uncheck the box under <i>Autofill settings</i> in the checkout and confirm your choice.</p>	
With “automatic filling of your personal data” in the settings for autofill in the checkout, Qliro saves your information in the checkout. We process your personal data to enable automatic autofill of your information the next time you visit the checkout, regardless of which device you use.	<p>Identification Data</p> <p>Contact Data</p>	<p>We base our processing on Article 6.1 (f) GDPR (legitimate interest). We have a legitimate interest in processing your personal data to make your user experience easier through the autofill function.</p> <p>After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. We also consider the processing necessary to achieve the purpose.</p> <p>If you do not want automatic filling of your personal data the next time you visit the checkout, you can uncheck the box under <i>Autofill settings</i> in the checkout and confirm your choice.</p>	<p>We process your personal data for automatic filling for sixty (60) days after you last used the checkout.</p>

#### 4. YOUR RIGHTS REGARDING QLIRO’S PROCESSING OF YOUR PERSONAL DATA

As a data subject, you have several rights concerning your personal data according to the GDPR. These rights are detailed below. If you wish to exercise your rights, you can contact us using the contact details provided in section 1 of this privacy policy, for example, by sending an email to [kundservice@qliro.com](mailto:kundservice@qliro.com).

#### 4.1. RIGHT TO INFORMATION

You have the right to receive information about how Qliro processes your personal data. This information is primarily provided through this privacy policy when your personal data is collected and is always available on Qliro.com and in the Qliro app. You also have the right to receive specific information in the event of a personal data breach that affects your personal data and is likely to lead to a high risk for your rights and freedoms, such as the risk of fraud or identity theft. We will communicate such information directly to you via email or another appropriate medium.

#### 4.2. RIGHT OF ACCESS

You have the right to request confirmation of whether Qliro processes your personal data. If we process personal data about you, you have the right to access a copy of the personal data that Qliro processes about you. There may be legal provisions that prevent us from disclosing certain information to you, such as the Act on Measures against Money Laundering and Terrorist Financing (2017:630). Under certain conditions, Qliro may also deny your request for access if, for example, you request access multiple times within a short period. When requesting access or a copy, we need to take certain measures to verify your identity as the data subject.

#### 4.3. RIGHT TO RECTIFICATION

You have the right to have incorrect personal data rectified or supplemented with personal data that is missing. The right to rectification applies to both personal data collected from you, or a third party and your potential profile created by Qliro through profiling. You can notify us if you wish for us to correct or supplement your personal data.

#### 4.4. RIGHT TO ERASURE ("RIGHT TO BE FORGOTTEN")

You have the right to request the erasure of your personal data. You also have, in some cases, the right to have your personal data deleted or forgotten. This applies if:

- the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- you withdraw your consent on which the processing is based, and there is no other legal ground for the processing;
- you object to processing based on Qliro's legitimate interest, and there are no overriding legitimate grounds for the processing that outweigh your interests;
- the processing is for direct marketing purposes, and you oppose the processing of your data;
- the personal data has been processed unlawfully; or
- it is necessary to comply with a legal obligation.

Please note that Qliro has the right to partially or fully deny your request for the deletion of your personal data to the extent necessary for Qliro to continue processing your personal data to, for example, comply with a legal obligation or to establish, exercise, or defend legal claims. If you use any of our products or services, have a debt with us, or otherwise have an ongoing relationship with us, you generally cannot have such data deleted. Additionally, there are legal requirements that prevent us from deleting certain information even after the cessation of services or other relationships with us. These obligations stem from banking-, anti-money laundering, accounting, and tax legislation, as well as consumer protection laws.

However, we ensure that such personal data is not processed beyond what is necessary to fulfil these obligations, and we limit the processing and access to personal data as much as we can. You can notify us if you wish for us to delete your personal data. Upon such a request, we need to take certain measures to verify your identity as the data subject.

#### 4.5. RIGHT TO RESTRICTION OF PROCESSING

You have the right to request the restriction of the processing of your personal data. A restriction can be made if:

- you believe the personal data we process about you is incorrect and you have requested rectification, you can request restricted processing during the time we are verifying the accuracy of the personal data;
- the processing is unlawful, and you oppose the deletion of the data and instead request the restriction of their use;
- Qliro no longer needs the personal data for the purposes of processing, but you need the data to establish, exercise, or defend a legal claim; or
- you have objected to processing based on legitimate interest; you may request that we restrict the processing during the time we are evaluating whether our legitimate interests outweigh your legitimate interests.

If the processing has been restricted according to any of the above situations, we may, in addition to storage, only process the data to establish, exercise, or defend legal claims, to protect someone else's rights, or based on your consent.

#### **4.6. RIGHT TO DATA PORTABILITY**

You have the right to request the transfer of the personal data you have provided to us through your consent or based on a contract with us, and the processing is automated (data portability). You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transfer these personal data to another data controller. The transfer of your personal data can be done provided the transfer is technically feasible.

#### **4.7. RIGHT TO OBJECT TO CERTAIN PROCESSING**

You have the right to object at any time to our processing of your personal data based on legitimate interest as a legal basis. Continued processing of your personal data requires us to demonstrate a compelling legitimate ground for the processing that outweighs your interests in the specific processing. Otherwise, we may only process the data to establish, exercise, or defend legal claims.

You always have the right to object to direct marketing, including profiling, without a balance of interests being made. If you have objected to processing for direct marketing, we may no longer process your data for such purposes.

#### **4.8. AUTOMATED DECISION-MAKING, INCLUDING PROFILING**

As a data subject, you also have the right not to be subject to a decision based solely on automated processing, which produces legal effects concerning you or similarly significantly affects you. You have the right to object to such processing, including profiling. However, this right does not apply if the decision-making is necessary to enter into or perform a contract with you, such as a credit assessment, or if you have given explicit consent.

Qliro uses automated decisions when you apply for a credit by choosing Qliro's payment method at checkout or applying for a personal loan. You have the right to express your opinion, contest the decision, and request a review by a human.

When you apply for a credit, Qliro processes your personal data for profiling, which is a procedure that may involve a series of statistical conclusions to assess certain personal characteristics. The categories of personal data used for profiling are identification data, contact data, financial information, and generated information. Through the processing of your personal data, your creditworthiness or so called "profile" is determined. Automated decisions to approve or deny your credit application are made based on your profile. If you do not meet the basic criteria according to the respective product terms, a decision to deny the requested credit will be made automatically.

Automated decisions to deny a credit application can also be made based on your profile for fraud prevention. In addition to the personal data processed in connection with the credit application, Qliro also processes your device information and information about goods/services for profiling for this purpose.

#### **4.9. RIGHT TO WITHDRAW YOUR CONSENT**

If Qliro processes your personal data based on your consent, you have the right to withdraw your consent at any time. Qliro will then cease the processing that relies on the consent. You can withdraw your consent by sending us a message via the contact details provided in section 1.

#### **4.10. THE RIGHT TO LODGE A COMPLAINT**

If you believe that we process your personal data in violation of GDPR, you have the right to lodge a complaint to a Data Protection Authority via the contact details provided in section 9. Learn more about how to lodge a complaint at each Data Protection Authorities' website.

You can also address complaints to our Data Protection Officer in writing via email by sending your complaint to the Data Protection Officer via the contact details provided in section 8.

#### **4.11. WHO MAY WE SHARE YOUR INFORMATION WITH?**

Qliro does not sell your information to third parties. However, it is necessary for us to share your personal data with certain third parties in order to provide you with our services and fulfil our agreement with you. We implement reasonable technical,

legal, and organizational measures to ensure that your personal data is handled securely and with an adequate level of protection. The following categories of third parties may receive and process your personal data.

#### **SUPPLIERS AND SUBCONTRACTORS**

Suppliers and subcontractors are companies that provide Qliro with the services and functionalities required for us to provide you with our services and products. In most cases, suppliers and/or subcontractors are companies that only have the right to process the personal data they receive from Qliro on behalf of Qliro, so-called data processors. Examples of such suppliers and subcontractors are financing partners, financial infrastructure partners, and email-, print-, and logistics companies. In some cases, however, some of these suppliers and/or subcontractors process your personal data for their own purposes and are thus separately responsible for that part of the personal data processing. To read more about how these companies process your personal data, we refer you to their privacy policies.

Qliro needs to access services and functionalities from other companies that Qliro cannot offer itself. Therefore, we may share your personal data with suppliers or subcontractors to access these services and functionalities in the performance of our contractual obligations to you or to fulfil our legitimate interest and for the other purposes outlined in this privacy policy. We ensure that the processing involved is necessary to achieve this interest and that our interest outweighs your right not to have your data processed for this purpose. You have the right to object to this processing if we base the transfer on legitimate interest, due to circumstances specific to your individual case. More information about your rights can be found in section 4.

#### **MERCHANTS**

Merchants are companies connected to Qliro's services that you shop from when using our checkout. When you make a purchase on a merchant's website using our checkout, the merchant gains access to information necessary to execute and manage your purchase. Qliro also provides information that the merchant needs for certain legitimate interests, such as dispute management. For such information, the respective merchant's privacy policy applies, and the personal data is handled in accordance with it. You have the right to object to this processing if we base the transfer on legitimate interest due to circumstances in your individual case. More information about your rights can be found in section 4.

#### **CREDIT REPORTING COMPANIES AND CREDIT REGISTERS**

Financial information about granted credits and loans, payment defaults, and credit abuse is provided to credit reporting companies and credit registers.

#### **DEBT COLLECTION AGENCIES**

We may share your personal data when we assign debt collection agencies to collect unpaid debts or if we sell the debt. Debt collection agencies may also process your personal data as data controllers according to their privacy policy. The legal basis for such disclosure is Qliro's legitimate interest in collecting and selling claims. You have the right to object to this processing due to circumstances in your individual case. More information about your rights can be found in section 4.

#### **PARTIES INVOLVED IN THE PAYMENT FLOW**

To administer your purchase of a good or service, we need to provide personal data to the payment service provider for the payment method you have chosen, such as card acquirers for card transactions. To administer your direct debit payments (Bg Autogiro), we need to provide personal data to Bankgirot. To administer and execute withdrawals from your savings account in Qliro, we need to share your personal data with the bank where you have your withdrawal account, in compliance with applicable banking secrecy regulations. The legal basis for such disclosure is the performance of a contract with you.

#### **PARTNERS**

Qliro may work with various partners, for example in the Qliro app. If you choose to use a partner's service via the Qliro app, we provide generated information such as the fact that you reached the partner via the Qliro app. For certain services you choose, we share financial information and information about goods/services with the relevant partner. Typically, only pseudonymized personal data is shared with our partners. The legal basis for this is to fulfil the contract with you and Qliro's legitimate interest in product development and partnership follow-up. In some partnerships, we also share your contact information, which will be made clear when you choose to use the partner's service. You have the right to object to this processing if we base the transfer on legitimate interest, due to circumstances specific to your individual case. More information about your rights can be found in section 4.

#### **AUTHORITIES**

We are in some cases obligated to share your personal data with different authorities if required by law or in response to a legal request, for example, Financial Supervisory Authority, Tax Authority, Enforcement Authority, Authority for Privacy Protection and Police Authority. An example of when we are legally obligated to disclose such information is to prevent money laundering and terrorist financing according to the Act on Measures against Money Laundering and Terrorist Financing (2017:630). We may also disclose your personal data to authorities if you have consented to us doing so.

## MERGERS AND ACQUISITIONS

In the event of a sale, merger, or other business transfer, we may transfer your personal data to a third party involved in the transaction. The legal basis for such transfer is Qliro's legitimate interest in conducting the business transaction. You have the right to object to this processing due to circumstances in your individual case. More information about your rights can be found in section 4.

## 5. TRANSFER OF YOUR PERSONAL DATA OUTSIDE THE EU/EEA

When applicable, we may share your personal data with other entities in a country outside the EU/EEA, known as a "third country". In a third country, GDPR does not apply, which may pose an increased privacy risk, including the possibility for authorities in a third country to access your personal data and for your ability to exercise control over the personal data. To protect your personal data and to maintain an adequate level of protection, the transfer is based either on a decision by the EU Commission on an adequate level of protection or through appropriate safeguards such as binding corporate rules approved by the competent supervisory authority or the EU Commission's standard contractual clauses combined with organizational and technical protective measures.

You can read more about which countries are considered to have an adequate level of protection on the EU Commission's website by following this link: [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en)

You can read more about the standard contractual clauses by following this link: [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)

We always aim to conduct a risk assessment before a transfer is made to a third country and implement both technical and organizational protective measures to ensure an appropriate level of protection. We always strive to transfer as little personal data as possible to countries outside the EU/EEA and, if possible, in anonymized form. For more information on the protective measures Qliro takes, see section 7 of this privacy policy.

## SOCIAL MEDIA

When you interact with us on social media such as Facebook, Instagram, LinkedIn, X (formerly Twitter), and YouTube, these companies will also collect and process your personal data. This means that a transfer of your personal data, such as your image and name, will occur to a third country outside the EU/EEA, specifically the USA. The transfer is necessary for you to contact and interact with us on social media.

Social Media/Platform	Personal Data that may be shared	Description	Contact Information
Facebook and Instagram (Meta)	Identification Data Contact Data	By using the platform to contact or interact with us, your personal data is also processed by Meta Platforms Ireland Ltd., a subsidiary of Meta Platforms Inc.  Meta Platforms Inc. is based in the USA, a third country with an adequate level of protection according to the EU Commission, provided the recipient company in the USA is affiliated with and certified under the Transatlantic Agreement <i>EU-USA Data Protection Framework</i> ("EU-USA DPF").  As of the latest update of this privacy policy, Meta Platforms Inc. is affiliated with and certified under the EU-USA DPF, and all third	Meta Platforms Ireland Ltd.  4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

		<p>country transfers are thus based on the EU Commission's adequacy decision.</p> <p>You can also read more about how Meta Platforms Ireland Ltd. processes personal data in their privacy policy here: <a href="https://www.facebook.com/privacy/policy">https://www.facebook.com/privacy/policy</a></p>	
LinkedIn	<p>Identification Data</p> <p>Contact Data</p>	<p>By using the platform to contact or interact with us, your personal data is also processed by LinkedIn Ireland Unlimited Company, a subsidiary of LinkedIn Corporation.</p> <p>LinkedIn Corporation is based in the USA, a third country with an adequate level of protection according to the EU Commission, provided the recipient company in the USA is affiliated with and certified under the Transatlantic Agreement <i>EU-USA Data Protection Framework</i> ("EU-USA DPF").</p> <p>As of the latest update of this privacy policy, LinkedIn Corporation is not affiliated with the EU-USA DPF, and third country transfers cannot thus be based on the EU Commission's adequacy decision. Instead, the transfer is supported by the EU Commission's standard contractual clauses, which you can read more about on LinkedIn's website: <a href="https://privacy.linkedin.com/gdpr">https://privacy.linkedin.com/gdpr</a></p> <p>You can also read more about how LinkedIn Ireland Unlimited Company processes personal data in their privacy policy here: <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a></p>	<p>LinkedIn Ireland Unlimited Company</p> <p>Wilton Plaza, Wilton Place, Dublin 2, Ireland</p>
X (formerly Twitter)	<p>Identification Data</p> <p>Contact Data</p>	<p>By using the platform to contact or interact with us, your personal data is also processed by Twitter International Unlimited Company, a subsidiary of X Corp.</p> <p>X Corp. is based in the USA, a third country with an adequate level of protection according to the EU Commission, provided the recipient company in the USA is affiliated with and certified under the Transatlantic Agreement <i>EU-USA Data Protection Framework</i> ("EU-USA DPF").</p> <p>As of the latest update of this privacy policy, X Corp. is not affiliated with the EU-USA DPF, and third country transfers cannot thus be based on the EU Commission's adequacy decision. Instead, the transfer is supported by the EU Commission's standard contractual clauses, which you can read more about on Twitter's website: <a href="https://gdpr.x.com/en/faq.html">https://gdpr.x.com/en/faq.html</a></p>	<p>Twitter International Unlimited Company</p> <p>One Cumberland Place, Fenian Street</p> <p>Dublin 2, D02 AX07 Ireland</p>

		You can also read more about how Twitter International Unlimited Company processes personal data in their privacy policy here: <a href="https://x.com/en/privacy">https://x.com/en/privacy</a>	
YouTube	Identification Data Contact Data	<p>By using the platform to contact or interact with us, your personal data is also processed by Google Ireland Limited, a subsidiary of Google LLC.</p> <p>Google LLC is based in the USA, a third country with an adequate level of protection according to the EU Commission, provided the recipient company in the USA is affiliated with and certified under the Transatlantic Agreement <i>EU-USA Data Protection Framework</i> ("EU-USA DPF").</p> <p>As of the latest update of this privacy policy, Google LLC. is affiliated with and certified under the EU-USA DPF, and all third country transfers are thus based on the EU Commission's adequacy decision.</p> <p>You can also read more about how Google Ireland Limiter processes personal data in their privacy policy here: <a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a></p>	<p>Google Ireland Limited</p> <p>Gordon House, Barrow Street, Dublin 4, Ireland</p>

## 6. HOW DO WE PROTECT YOUR PERSONAL DATA?

Qliro has implemented a range of technical and organizational measures to protect your personal data against loss, misuse, unauthorized access, unauthorized disclosure, alteration, and destruction. Learn more about Qliro's organizational and technical security measures here: <https://assets.qliro.com/terms/se/en/terms/1/dataprotection.pdf>

## 7. CHANGES TO THIS PRIVACY POLICY

We continuously improve and develop our services, products, Qliro app, and Qliro.com, and the content of this privacy policy changes over time. We encourage you to read this privacy policy every time you use our services and products. If significant changes have been made to our services, products, or this privacy policy, we may notify you via email or in other ways.

## 8. CONTACT INFORMATION FOR DATA PROTECTION OFFICER AND AUTHORITY FOR PRIVACY PROTECTION

Qliro has a Data Protection Officer (DPO) and data protection specialists who work daily on data protection issues to ensure that we comply with data protection legislation in all markets where we offer Qliro's products and services. If you have questions about the processing of your personal data, you are welcome to contact our DPO at the contact information below.

### DPO

Email: [dpo@qliro.com](mailto:dpo@qliro.com)

If you are not satisfied with our handling of your case, you have the right to submit a complaint to a Data Protection Authority.

### Data Protection Authority

See contact details following this link where you can choose a country: [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en#member-se](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en#member-se)

This privacy policy was last updated on 2024-04-10.