

# QLIRO BUSINESS PRIVACY NOTICE

This Qliro Business Privacy Notice (“**Privacy Notice**”) details Qliro AB’s (“**Qliro**”, “**we**”, “**us**” or “**our**”) commitment to protecting the privacy of individuals (“**you**”, “**your**”) who:

- a) enter into a contract with Qliro;
- b) request us to contact them via our online web forms;
- c) register a user account to access our services;
- d) use our websites;
- e) register and/or attend any of our events or webinars we attend (“**Events**”); or
- f) in other way represent its company (e.g. as employee) in the company’s relations with Qliro.

This Privacy Notice describes how Qliro collects, uses, shares and protect your personal data. It also describes your rights in relation to our use of your personal data, and how to exercise them. We always seek the best protection for your personal data and to comply with all laws and regulations applicable to us from time to time regarding data privacy.

## 1. INFORMATION YOU PROVIDE TO US

### From online web forms or Events

We collect personal data that you choose to send to us or provide to us when you submit online web forms on our websites or register/attend Events. Information we may collect is your contact information such as your name, title, name of the company you represent, address, email address, phone number, pictures/videos and voice/speech when attending Events etc. We will also keep track of our correspondence with you.

### From our services

We collect your personal data when you register or authenticate into one or more of our services that are intended for use by companies (e.g. your employer). Our merchants will typically act as data controllers for any personal data related to them in connection with user accounts to services intended for use by companies (e.g. Merchant Web). The information we collect is account information such as your name, email address, your company name and website name. We base the processing of your personal data on our legitimate interest to provide your company with the service(s) your company has subscribed to.

When you contact our merchant support by telephone, the conversation is recorded. We retain the conversation to train our employees, improve our communication and maintain quality of our services.

## 2. INFORMATION WE COLLECT FROM YOU

### From websites

We may use cookies and other information gathering technologies to provide us with certain information related to your device when you visit our websites, such as your device’s IP address and your interactions with our websites. For detailed information about our use of cookies, please read our [Cookie Policy](#).

## 3. INFORMATION COLLECTED FROM OTHER SOURCES

### From your company

We may ask for and collect your personal data before entering a contract with your company to comply with anti-money laundering laws applicable to us. The information we collect is contact information, identification information, information about beneficial ownership and other information required by law, regulations and recommendations.

### From sanction lists and PEP lists

We may perform screenings of your personal data against lists of persons subject to sanctions or persons who are Politically Exposed Persons.

## 4. PURPOSE AND LEGAL BASIS FOR PROCESSING

We collect personal data from you if we need your personal data to enter into, to consider entering into, or to perform a contract with the company you represent. We may use your personal data to send you newsletters, marketing or otherwise inform you about our services,

offers or Events based on consent or our legitimate interests. We may also use your personal data before, during and after Events you attend organized by Qliro, including using your personal data for communication and marketing purposes e.g., in Qliro's digital channels, based on our legitimate interests, an agreement with you or your company or in some cases consent. We may also use your personal data to prevent and investigate fraudulent activities, unauthorised access to our services and other security purposes. We use your personal data based on our legitimate interests where our interests are not overridden by your interests or fundamental rights and freedoms of data protection.

If we collect your personal data from your company or from third-party lists for KYC purposes, we process your personal data to comply with laws applicable to us.

## **5. TRANSFERS AND DISCLOSURE**

### **Third-party service providers**

We share information, including your personal data, with third-party service providers who perform tasks on our behalf, acting as our processors or sub-processors in accordance with our instructions. We do not permit our processors or sub-processors to use your personal data for their marketing purposes or any other purpose than to provide their services to us. We may also share information that include your personal data with authorities or legal advisors based on our legitimate interests or if required by us according to law or authority decision.

### **Business partners**

In some cases we may share your personal data with our business partners, e.g., for Events and for marketing purposes.

### **Business transfers**

If Qliro choose to purchase or sell assets or businesses, or if Qliro itself (or parts thereof) is sold, we may share and/or transfer personal data with/to the buyer or seller (as applicable).

### **Transfers to a third country**

All personal data collected by us is generally stored within EU/EEA, however sometimes information is stored by us or our suppliers or subcontractors outside of EU/EEA. In those cases, we will apply such security measures which are in compliance with applicable law to ensure a secure transfer of data. This means that your personal data will be managed in a secure manner also in these cases, and in line with the level of protection that apply within EU/EEA.

## **6. HOW LONG YOUR PERSONAL DATA WILL BE PROCESSED**

Unless you do not object to our processing of your personal data, the personal data will be processed and stored by us as long as we deem it necessary in regard to the purposes set out above. When we no longer have a legitimate interest to process your personal data we will either delete or aggregate it.

## **7. YOUR PRIVACY RIGHTS**

### **Right of access**

You have a right to request a copy of your personal data as held by us. There is also a possibility to request access to such personal data in a machine-readable format in order to transfer such data to another data processor (data portability).

### **Rectification and limitation of information**

You have the right to have your information amended if you are of the view that your personal data that we process is incorrect or incomplete. You may also in certain cases request that our access to your personal data is limited, e.g. until we have amended your personal data as per your request.

### **Right to erasure**

You may request that personal data is deleted when it is no longer required for a legitimate purpose. However, some information needs to be kept by us according to law and/or regulation. Such obligations to retain your data follows from laws regarding money laundering. In those cases, we will limit our access to the information so that it may only be used to comply with these obligations.

## **8. CHANGES TO THIS PRIVACY NOTICE**

We may, at any time, need to make changes or additions to this Privacy Notice to reflect changes in our services or regulatory requirements. We encourage you to periodically review this page for the latest information on our privacy practises and you can see when this Privacy Notice was last updated by checking the date in the footer of this Privacy Notice.

## **9. CONTACT US OR THE DATA PROTECTION AUTHORITY**

### **Controller details**

Qliro AB, Swedish registration number 556962-2441, is a credit market company under the supervision of the Swedish Financial Supervisory Authority. If you wish to assert any of your rights as set out above, you may reach out to us in writing at:

Qliro AB  
Sveavägen 151  
SE-113 46 Stockholm, Sweden

You are also welcome to reach out to our customer service at 0200-430 030

### *Data protection officer*

We have a data protection officer (DPO) and personnel which work with data privacy matters on a daily basis, and to answer your question and to ensure that we comply with Swedish data protection legislation.

If you have questions or concerns on the processing of your personal data, you may contact our DPO at [dpo@qliro.com](mailto:dpo@qliro.com).

### *Data protection authority*

Should our assistance not be to your satisfaction you may also reach out to the competent supervisory authority. The Swedish Authority for Privacy Protection, *Integritetsskyddsmyndigheten*, may be reached at [imy@imy.se](mailto:imy@imy.se) or [www.imy.se](http://www.imy.se).