

# Qliro Privacy Notice, Merchants

Effective as of March 27, 2020, Qliro AB (“**Qliro**”, “**we**”, “**us**” or “**our**”) have updated this Qliro Privacy Notice, Merchants (“**Privacy Notice**”). This Privacy Notice details our commitment to protecting the privacy of individuals (“**you**”, “**your**”) who:

- a) request us to contact them via our online web forms;
- b) register a user account to access our services;
- c) use our websites; or
- d) in other way represent its company 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 you to exercise them. We are a data controller in respect of the personal data we receive or collect from you. 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*

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

### *From our Services*

We collect your personal data when you register a user account to access our services when you represent your company. The information we collect is account information such as your name or alias, email address, name of the company you represent and your company’s website name.

## 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](#).

### *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.

## 3. Information We Process from Third Parties

### *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 only if we need your personal data to enter or to perform a contract with the company you represent. We may also use your personal data to investigate and prevent fraudulent activities, unauthorised access to our services and other security purposes and for marketing 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 includes 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 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 at the top 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 +46-8 40 900 300.

*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 Data Protection Authority, *Datainspektionen*).