



INTEGRITY POLICY

In order to be able to offer our services to you we need to process your personal data. We always seek the best protection for your information and to comply with all laws and regulations applicable to us from time to time regarding data privacy. This policy is made under Swedish law

You may provide us with personal data directly or indirectly in a number of ways. By using any of our services you accept our integrity policy and the processing of personal data as set out below. **It is therefore important that you read and understand our integrity policy prior to using any of our services.**

This policy will help you understand how Qliro collects and uses your personal data. The policy also explains your rights against us, and how you may assert them.

We constantly improve and develop our services, products and web sites. The content of this policy may therefor change over time, always with due regard to your rights according to applicable law and regulation. We will notify you via e-mail or other appropriate means if the changes are material.

INFORMATION WE COLLECT

We may collect the following information when you contact us, confirm a purchase at a merchant web site, use the checkout (Qliro One), choose to use any of Qliro's payment methods for your payment (*eg.* invoice, part payment or account) or use any other of our services (*eg.* our app, My pages, loans or savings account). Telephone contacts may be recorded for the purposes described below.

- Personal and contact details, *eg.* name, social security number, sex, invoicing-, e-mail- and delivery address, mobile number etc.
- Details on how you use our services, including *eg.* how you arrived at the services, response-times and usage of our app.
- Your geographical information.
- Financial information regarding your income, other credits and negative credit history.
- Information on payments, *eg.* invoice details etc.
- Details regarding the goods/services purchased by you as well as your payment and credit history.
- Information on your device, *eg.* language settings, IP-address, browser, time zone, platform, operating system and resolution.

We use cookies and similar techniques when you visit our web sites or our checkout. You can find more information on cookies in our cookie statement on www.qliro.com.



HOW DO WE USE YOUR INFORMATION?

The information you provide to us is typically necessary in order for us to enter into an agreement whereas other information that we collect from you or others often is required for other purposes. Our services are digital and therefore many decisions are made automatically based on such information. The following section outlines the reasons for our processing of your personal data as well as when decisions are made automatically. Qliro only processes your information to the extent we are legally entitled to do so. The legal basis for such processing is typically to perform our contract, or some other basis which is considered legitimate according to law.

To communicate with you

We have a legitimate interest to use the information to do customer satisfaction surveys and to send information and marketing regarding the services you use as well as other services offered by us, *eg.* by way of SMS, e-mail or regular post. We want to be relevant in our communication and therefore we adapt the communication to your profile. You may always request to be removed from all or some of such send-outs by contacting customer services (see below).

To perform, offer and improve our services

We use the information we collect to perform, offer and improve our services. In order to perform our contractual obligations to you to we need to (i) verify your identity as well as your personal- and contact details, (ii) administer the service you are using and your purchase, *eg.* a payment or provide you with information that you have requested from us regarding a product or service or otherwise perform our obligations to you, and (iii) ensure that content is presented the right way to you and the device you are using.

Our contractual obligations to you and other legitimate interests is the basis for our customer analysis and to administer our services, *eg.* troubleshooting, testing and statistical purposes. Our legitimate interests and legal obligations requires us to use your information to manage and analyse risk and to prevent fraud, *eg.* that an unauthorised person makes a purchase using your name.

We also need your information to determine what payment methods and other services we are able to offer to you, *eg.* by internal and external credit assessments, as well as for risk management and to prevent abuse of our services so we can keep them safe to use for you. We do this to comply with applicable law and regulation and to perform our obligations in our agreement with you.

In order to do this in an efficient and secure manner, and to be able to revert expediently and in a correct way, we sometimes make decisions automatically (*ie.* without direct interaction from any of our employees) based on such information. This notwithstanding and if you disagree with any such decision, you may still request a manual review.

Sometimes we are under a legal obligation to process your information. This is the case *eg.* to prevent money laundering, to comply with capital adequacy requirements and accounting rules. Additionally, we have a legitimate interest to use your information for general business development, *eg.* to develop products and applications.

WHO MAY ACCESS YOUR INFORMATION?

Qliro does not sell your information to other parties but we still need to share information with third parties as further set out below. When doing so we always take all reasonable technical, legal and organisational measures to ensure that your data is treated securely and with an adequate level of protection.

Merchants

The merchant selling the product or service that you purchase will receive such part of your information which is necessary to perform and administer your purchase, and to manage disputes. Such information will be processed by the merchant in accordance with the merchant's own data privacy guidelines.

Credit reference agencies and similar providers

We need to share and collect certain information from and with credit reference agencies and similar providers in order to assess your credit worthiness as well as to confirm your identity and address.

Suppliers and subcontractors

Certain suppliers and subcontractors (eg. financing partners, e-mail-, printing and logistical companies) may need access to parts of your information in order for us to perform our contractual obligations to you, and for the other purposes set out in this policy.

Government bodies

Certain authorities, eg. tax agencies and the Police, require us to share information. An example of when we are legally obliged to share information is to prevent money laundering and terrorist financing.

Disposals

If Qliro purchases or sells assets or businesses, or if Qliro itself (or parts thereof) is sold, the buyer or seller (as applicable) may get access to your information.

WHERE DO WE STORE YOUR INFORMATION?

All information 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 information will be managed in a secure manner also in these cases, and in line with the level of protection which apply within EU/EEA.

FOR HOW LONG DO WE PROCESS YOUR INFORMATION?

We will only process your information for as long as we are required to do so according to law or have a legitimate interest to do so, or to the extent required to perform our contractual obligations to you.

YOUR RIGHTS: RECTIFICATION, ERASURE AND ACCESS TO INFORMATION

You have a number of rights according to law in relation to your information. Set out below is a brief introduction to some of these rights.

Rectification and limitation of information

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

Right to erasure

You may request that information 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 general banking, money laundering, accounting and tax but also from consumer protection regulations. In those cases, we will limit our access to the information so that it may only be used to comply with these obligations.

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).

CONTACT US

Qliro AB, Swedish registration number 556962-2441, is a credit market company under the supervision of the Swedish Financial Supervisory Authority. Qliro AB is the responsible entity (controller) for the processing of your personal data as set out above. 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 wish to assert any of your rights as set out below you may reach out to us in writing at the following address: Sveavägen 151, SE-113 46 Stockholm, Sweden, our customer service at kundservice@qliro.com. You may also visit our web site at www.qliro.com. If you have other questions on the processing of your personal data you may contact our DPO at dpo@qliro.com.

Please reach out to us if you have any concerns on the processing of your personal data, and we will do our utmost to assist. Should our assistance not be to your satisfaction you may also reach out to the competent supervisory authority (The Swedish Data Protection Authority, *Datainspektionen*).