

PAYCONIQ PRIVACY & COOKIES STATEMENT

With the Payconiq App (the 'App'), you can use your smartphone or tablet to pay for goods and services purchased by you from Payconiq-approved (online) merchants. You can also use the App to make and receive payments from/to your contacts who also use Payconiq. Payments can also be viewed in the historical transactions. This privacy and cookies statement is in two parts: one deals with the use of the website, the other specifically with usage of the App. Where certain parts pertain only to the use of the App and/or the website we will indicate this.

Payconiq processes both privacy sensitive and personal data. Payconiq understands the absolute importance of safeguarding the confidentiality of personal data. Personal data is therefore processed and protected by us with due care. We do so in accordance with the applicable laws and regulations governing privacy legislation. Among other things, this means that we:

- **clearly state the purposes for which** we process personal data; we do this through our privacy and cookies statement;
- **limit our collection of personal data** to personal data that are necessary for legitimate purposes;
- we first **ask for your express permission** to process your personal data, in those cases where your permission is required;
- **we take appropriate security measures** to protect your personal data, and we demand the same from any third parties that process personal data on our behalf;
- we respect your right to **inspect and correct your personal data and to have it deleted if required by you.**

In this privacy and cookies statement, we describe the type of personal data we compile and use and for what purposes. We therefore recommend that you read this privacy statement carefully.

USE OF PERSONAL DATA

When you use our service, specific data pertaining to you is automatically stored by us. Some of this may contain personal data. We store and use only the personal data that is passed on by you in connection with the services you request from us, as well as data knowingly provided by you to us for processing purposes.

We use the following personal data for the purposes set forth in this privacy and cookies statement:

- forename and surname;
- e-mail address;
- address details;
- IBAN bank account number;
- telephone number;
- transaction details;
- location details;
- surfing and navigation behaviour;
- technical data pertaining to your device;
- contacts on your address list (subject to your express consent);
- details regarding electronic approval of payments;
- direct debit mandate.

We also use the following personal data of visitors to our website:

- browser settings;
- IP-address.

Payconiq adds your name and the last five digits of your IBAN bank account number to the merchant's transaction statement. This enables the merchant to identify the source of payments.

OBJECTIVES OF APP DATA PROCESSING

We use the above data for the following purposes:

1. To offer Payconiq's services:
 - To register you as a new user of the App.
 - To identify and authorise you.
 - To debit amounts payable by you from your bank account.
 - To reverse payments. Depending on the reason for the reversal, to enable us to contact the (online) merchant for additional information regarding the transaction in question.
 - To enable you to make payments to (online) merchants and to facilitate payments between you and your contacts who also use Payconiq. To facilitate this process, Payconiq requests access to the contacts on your address list; we process the name and surname of those who make payments to you or to whom you remit payments. We also process the message details you include with your payment.

The App needs to have access to the following services on your smartphone or tablet:

- Your address book, to facilitate payments between you and other Payconiq users.
- Your location details, to display the nearest merchant.
- To send you messages confirming incoming and outgoing payments.
- Payconiq records transaction details so as to give you a statement of your historical transactions.

2. Fraud prevention

The prevention of fraudulent use and limiting Payconiq's exposure to risk is another objective, as well as preventing, investigating and countering (attempted) unlawful and undesirable activities aimed against Payconiq, its customers and staff; also, participating in internal and external warning systems.

To this end, Payconiq stores your transaction data, including information in relation to (online) merchants who supplied you with products or services, your personal data and information concerning your electronic approval for the execution of payments.

3. Improvement of Payconiq services

Payconiq stores and analyses your (transaction) data for purposes of improving the Payconiq services. Such data is used for example to improve the user-friendliness of the App.

4. Marketing for purposes of the App

Payconiq analyses its users' data when preparing marketing campaigns for new and existing users. The result of these analyses is used in aggregated form.

5. Compliance with legislation and regulations

Personal data is processed for purposes of complying with laws and regulations as well as sector-specific guidelines and regulations, including legislation to prevent money laundering and the financing of terrorism, and statutory retention periods.

OBJECTIVES OF WEBSITE DATA PROCESSING

1. Improvement of Payconiq services

Payconiq retains and analyses your data for purposes of improving the Payconiq services, including the website. These data are processed for example to improve the user-friendliness of the website.

ADVERTISEMENT IDs WHEN USING THE APP

To optimise its services, Payconiq uses advertising IDs in its App. In Android these are called 'Advertising-IDs', and in iOS, 'Advertising Identifiers'. These are unique, non-personalised and non-permanent ID-numbers that are made available for a particular end device by iOS, Android or another operating system. Such compiled data are not linked to any other device-related information. The ID numbers are used by Payconiq to present you with personalised adverts and for purposes of assessing your usage. The advertising ID is a standard system used when advertising products and in the execution of analyses. These numbers can be reset. For more information on the resetting of these numbers, please refer to the website of Google or Apple, otherwise check the settings on your smartphone or tablet.

RETENTION PERIODS

We retain your data for no longer than is necessary for the objectives described in this privacy and cookies statement, except where we are obliged to do so by law.

SECURITY

We take appropriate security measures to prevent misuse and unauthorised access to your personal data. In so doing, we make sure that only necessary persons will have access to your data, and that access to your personal data is protected.

NEWSLETTER

We distribute a newsletter to inform customers who are interested in learning about our products and services. Every newsletter contains a link for those who wish to unsubscribe.

PROVISION TO THIRD PARTIES

The personal data you make available to us will not be disclosed to third parties without your consent, except where this is necessary in implementation of an agreement you conclude with us or where we are obliged to do so by law. In the delivery of its services, Payconiq also makes use of third parties, such as the supplier of its CRM system.

COOKIES AND OTHER IDENTIFIERS

Cookies are small text files that are automatically stored or read out from the visitor's device (including a PC, tablet or smartphone) whenever you visit a website or when installing and using an app. This is done via the web browser or via the app on the device. The information obtained by a cookie regarding your use of the website or the app can be transferred to a secure server in use by Payconiq or a third party.

The App and the Payconiq websites use cookies, tokens with an expiration period and similar technologies to process certain information from your device. For example, to remember your identity on different screens in the App, so that you do not have to log in repeatedly during your user's session. In the process, we use the following cookies:

- Google Analytics (Google Analytics collects information on how you navigate on the App and the website and regarding how much time you spend on the App and the website, how much time you spend on a particular page, from which website you were directed to the Payconiq website, the time and date on which you open the App or website, the type of browser that is used, the IP address of your smartphone or tablet and websites that you visit after using the App or logging on to the Payconiq website);
- Visual Website Optimizer;
- Google Tag Manager, to ensure that the website can 'remember' a user's activity on the previous pages or interaction with the website.

This information is collected and analysed for the following purposes:

- to generate general statistics and to obtain information on the public's usage of our App and the website;
- to improve the user-friendliness of the App and the website;
- to analyse usage of the App and the website;
- to match the content in our App and on the website to your interests based on your click and surfing behaviour;
- to match the ads on our website and in our newsletters to your interests based on your click and surfing behaviour;
- to improve Payconiq's marketing activities for the benefit of existing and new users.

Google is incorporated in the United States. Google has Privacy Shield certification. Click [here](#) for more information on Privacy Shield.

Payconiq has taken the following measures so as to guarantee your privacy:

- Payconiq has concluded a processor's agreement with Google. Under the terms of this agreement, personal data may only be processed by Google on behalf of Payconiq and in accordance with its instructions.
- Payconiq has activated the option of removing the last octet of 8 bits from the IP address prior to Google retaining your IP address.
- Payconiq has de-activated the standard setting in Google Analytics for sharing your personal data with Google.
- Payconiq does not share any Google Analytics data with any other services of Google.

Cookies are used to collect data, including the following: your IP address/ID of the device you use to visit the website, data on your click and surfing behaviour, and the resolution used by you in viewing the website.

The website also includes buttons to access and share pages with friends on social networks (such as Facebook, Twitter and Vimeo). To enable these buttons to function, the website includes a code that is provided by these third parties. This code also places a cookie. The privacy statement of these third parties sets out what they do with your personal data.

ENABLING AND DISABLING COOKIES

You can disable the placement of cookies by changing your browser settings (for specific instructions, see your browser help page). If you only wish to accept cookies for Google Analytics and to enable usage of the website rather than advertising cookies, select the following setting in your browser "*block cookies from third parties*". **Note:** most websites do not offer optimum performance when the cookies are disabled.

DISABLING COOKIES

Most cookies have an expiration date. This means that they expire automatically after a given period and discontinue retaining data from your website visit. You can also disable the cookies manually prior to the expiration date. For more information on this, see the help-function of your browser.

WEBSITES OF THIRD PARTIES

This privacy and cookies statement does not apply in regard to the websites of third parties that are associated with our website via links. This privacy and cookies statement does not apply for example to the (online) merchants from whom you obtain products or services. We cannot guarantee that your personal data will be used by these third parties in a reliable and safe manner. We advise therefore that you read the privacy statement of these websites before availing of these services.

RIGHTS OF DATA SUBJECTS

If you have provided personal data to us, you have the right to contact us requesting to view, change or remove this data. You can send this request by E-mail to info@payconiq.com, or call us on: + 31 (0)20 – 760 66 99 (Mondays to Fridays, 9.00-17.00).

CHANGES IN THIS PRIVACY AND COOKIES STATEMENT

We reserve the right to amend this privacy and cookies statement. Modifications will be notified in the App and on our website. For this reason, it is recommended that you check these on a regular basis in order to be aware of changes.

SUPERVISORY AUTHORITY

We are of course at your service should you wish to make a complaint regarding the processing of your personal data. You have the right in accordance with privacy legislation to submit a complaint to the competent supervisory authority in connection with our processing of your personal data.

CONTACT

Should you have any further queries and/or comments to make after reading our privacy and cookies statement, please get in touch with us as follows:

Website: <https://www.payconiq.com>
Address: Payconiq International S.A.
7, rue Jean Fischbach
L-3372 Leudelange
Luxembourg
Telephone number: +31 (0)20 760 66 99
E-mail address: info@payconiq.com

This privacy and cookies statement was last modified on 1 September 2017.

Payconiq International S.A. has its registered office at 7, rue Jean Fischbach, L-3372 Leudelange, Luxembourg, and is listed in the Commercial Register in Luxembourg under number B 169621. Payconiq International S.A. is a payment institution supervised by the Commission de Surveillance du Secteur Financier («CSSF»), the financial regulator in the Grand Duchy of Luxembourg.