

DATA PROTECTION POLICY

This Data Protection Policy applies to all Eurogiro services.

For the purpose of this policy, personal data means any information relating to an identified or identifiable natural person see article 4(1) of Regulation (EU) 2016/679 of 27 April 2016 (the "General Data Protection Regulation"/"GDPR").

1. ROLE OF THE PARTIES

A Eurogiro member ("Member") is a data controller with regard to the processing of personal data that Members collect, process and supply to Eurogiro as part of their use of Eurogiro services.

Where the Member acts as the data controller Eurogiro is a data processor.

Eurogiro is a data controller in relation to the processing of personal data that Eurogiro processes for its own purposes.

2. EUROGIRO AS DATA CONTROLLER

Eurogiro may use personal data Eurogiro collects in the context of its services for Eurogiro's own purpose. These data may include:

- Amount, number and purpose of transactions,
- unique identifier of sending and receiving party and end-user (i.e. bank account, country, mobile no. e-wallet)
- Personal data from individuals working for Members, including name, title, email and postal address, telephone no. and other credentials.

Eurogiro may use these data to provide products and services to Members, to manage business affairs and financial reporting, for marketing and to comply with applicable law, as well for accounting, bookkeeping, auditing, billing, product development and analytics purposes, fraud prevention, managing risk exposures and compliance purposes.

Eurogiro may also anonymize personal data and furnish aggregated data report

for advising Members regarding pattern of money transfers, fraud and other insights that may be extracted from this data.

3. EUROGIRO AS DATA PROCESSOR

Eurogiro will only undertake processing of personal data upon instruction of the data controller.

Annex 1 lists:

- The purpose and nature of the data processing to be carried out by Eurogiro,
- the categories of data subjects,
- the categories of personal data, and
- the duration of the data processing.

Eurogiro may not process or use the Member's personal data for any other purpose than provided in this policy, including the transfer of personal data to any third country or an international organization, unless Eurogiro is required to do so according to Union or member state law. In such case, Eurogiro shall inform the Member in writing of such legal requirement before the processing commences, unless that law prohibits such information on important grounds of public interest.

Eurogiro undertakes to implement appropriate technical and organizational security measures to prevent that the personal data processed by Eurogiro are;

- accidentally or unlawfully destroyed, lost or altered,
- disclosed or made available without authorization, or
- otherwise processed in violation of the GDPR.

Eurogiro must comply with applicable data security requirements pursuant to Union or member state law that are directly applicable to Eurogiro; including the data security requirements in the country of establishment of Eurogiro or in the country where the data processing will be performed.

Eurogiro will, upon request, provide the Member with sufficient information necessary to enable the Member to ensure that Eurogiro complies with its obligations, including that the appropriate

technical and organizational security measures have been implemented.

Furthermore, the Member is entitled at its own cost to appoint an independent certified public accountant who shall have access to Eurogiro's data processing premises and receive the necessary information in order to be able to audit whether Eurogiro complies with its obligations, including whether the appropriate technical and organizational security measures have been implemented.

Eurogiro is bound by confidentiality, and such confidentiality obligations shall apply to the Member's personal data.

Eurogiro must ensure that the persons authorized to process the Member's personal data are only granted access to personal data on a need-to-know basis and have committed themselves to confidentiality or are subject to an appropriate statutory obligation of confidentiality.

Eurogiro will inform the Member of the data processing locations used to carry out the data processing. Locations are listed in **Annex 1**. Eurogiro will inform the Member of subsequent changes hereto by providing a prior written notice hereof by mail or email.

The Member has given permission to the transfer of personal data to third countries.

Eurogiro must without undue delay after becoming aware of the facts notify the Member in writing about;

- any request for disclosure of personal data processed by authorities, unless expressly prohibited under Union or member state law,
- any finding of a breach of security that results in accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed by Eurogiro, or
- any request for access to personal data received directly from the data subjects or from third parties.

The Member must inform the data subjects that all requests for exercising the data subjects' rights laid down in Chapter III of the GDPR must be sent directly to the Member, and the Member is responsible for replying to such requests. Eurogiro will assist the Member by appropriate technical and organizational measures, insofar as this is possible, for the fulfilment of the Member's obligations to respond to requests from data subjects exercising their rights laid down in Chapter III of the GDPR. Such assistance will be provided within reasonable time, taking into account any deadlines determined by authorities towards the Member, provided that the Member in any such event promptly has given Eurogiro notice of the request from the data subject. Eurogiro is entitled to invoice the Member for costs incurred and work performed in connection with assistance on time and material basis.

Eurogiro will assist the Member in ensuring compliance with the obligations pursuant to Articles 32 to 36 of the GDPR taking into account the nature of the processing and the information available to Eurogiro.

4. SUB-PROCESSOR

Eurogiro may engage sub-processors for the processing of personal data in connection with its services to the Members. Eurogiro uses the sub-processors set out in **Annex 1**.

If Eurogiro wishes to add or replace a material sub-processor, such addition or replacement Eurogiro will inform its Members.

Prior to the engagement of a sub-processor, Eurogiro shall conclude a written agreement with the sub-processor, in which the same data protection obligations as set out in this schedule shall be imposed on the sub-processor to the extent relevant in respect of the sub-processor in question, including an obligation to implement appropriate technical and organizational measures in such a manner that the processing will meet the requirements of the GDPR.

If the sub-processor fails to fulfil its data protection obligations, Eurogiro shall remain fully liable to the Member for the performance of the sub-processor's obligations.

JULY 2018

ANNEX 1

DATA PROTECTION POLICY

SERVICES

IT-connection availability for initiating transfer of data regarding transaction of funds.

PURPOSE AND NATURE OF THE DATA PROCESSING

The purpose of the data processing is for Eurogiro to provide the above-mentioned services.

The nature of the data processing related to the services is:

Collection

Processing

Storage

Deletion

Transfer

CATEGORIES OF DATA SUBJECT

Customers of sending and receiving party.

CATEGORIES OF PERSONAL DATA

Bank account number, name, log data, national identifier, purpose of money transfer, transaction amount, time of transaction, home address, currency, country of origin/destination and KYC information, i.e. passport information.

DURATION OF THE DATA PROCESSING

The processing is not time limited.

EUROGIRO SUB-PROCESSORS

PROCESSING LOCATIONS

Eurogiro service location

Service location	Is personal data processed from the location
Toldbodgade 55b 1253 København K	No

Sub-processor's service location

Entity	Purpose	Location	Is personal data processed from the location

Data processing location outside EU/EEA

Entity	Purpose	Legal basis for data export
		EU Model Clause

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