

Data Privacy Notice AIS

In this Data Privacy Notice “**Unifiedpost Payments SA**”, “**we**”, “**us**” and “**our**” means “Unifiedpost Payments S.A.”, with registered office at Avenue Reine Astrid 92A, 1310 La Hulpe, Belgium (with company number 0649.860.804).

1. About this Data Privacy Notice

For the purposes of data protection law, we are a data controller in respect of your personal data. We are responsible for ensuring that we use your personal data in compliance with the applicable Belgian and European data protection laws, meaning the General Data Protection Regulation 2016/679, the implementing acts in Belgium and/or any other applicable law or regulation relating to the protection of personal data.

This Data Privacy Notice applies to “you”, the individuals using the Account Information Service (the “Service”) provided by us as described in section 3 of the Account Information Service Terms of Use (the “Terms of Use”).

This Data Privacy Notice sets out the basis on which any personal data that you provide to us, that we create, or that we obtain about you from other sources, will be processed by us. Please take the time to read and understand this Data Privacy Notice.

2. Categories of personal data we collect and process

2.1 Information that you provide to us

In the course of providing the Service to you, we will collect and process the following personal data relating to you:

- Personal details: names, surnames, gender, birth dates and other elements of civil status;
- Identity documents;
- Contact details: work and private postal addresses, work and private email addresses, work and private telephone numbers, etc.;
- Data related to electronic identification and data relating to IT-usage;
- Content of any electronic communication (e.g. telephone calls, internet discussion, emails, data related to payment systems etc.) exchanged between you and us;
- Online accounts held in the European Union in your name with other payment service providers, such as your online bank account provider or credit card issuer;
- Unique Identifying Information: the combination of letters, numbers or symbols used to identify an online account, such as the account number, International Bank Account Number (IBAN), Bank Identifier Code (BIC) or SWIFT code;
- Data which is provided as an output of the use of the Services by you such as the information available on the bank statement related to transactions performed by you, such as the account number and legal address of the payer and payee and any specifications made in the communication reference part of the transaction.

2.2 Information we obtain from other sources (such as other payment service providers, public sources...)

- Account Information (such as movements on the payment accounts) provided by ASPSP.

When the personal data is collected from you (directly or through another source), the provision of the personal data requested is mandatory. Any refusal to do so may have as a consequence that we may not be able to provide the Service to you or may be in breach of a statutory or regulatory obligation applicable to us.

3. Purposes of processing your personal data

Your personal data may be stored and processed by us for the following purposes:

- providing the Service in accordance with the Terms of Use;
- participating in the prevention and detection of fraud and related crimes, producing statistics, management information and executing tests, complying with anti-money laundering, terrorism and related legislation and complying with other legal and regulatory obligations;
- complying with statutory and regulatory requirements to which we are subject, particularly in matters concerning identification controls, checking transactions, operational risk management, the prevention of conflicts of interests, the prevention of the fraud, the fight against money laundering and financing of terrorism;
- establishing statistics and tests;
- marketing purposes (unless you object to it), organising commercial events, offering new services, and conducting statistical and private capital surveys (including behavioural surveys).

4. Legal grounds for the processing of your personal data

We are entitled to use your personal data for the above purposes on the following legal grounds:

- the necessity to perform a contract, namely the offering and provision of the Service to you;
- your consent to the processing of your personal data for a certain period of time provided under the section "Retention of your personal data" after we stop providing the Service;
- a statutory or regulatory requirement (particularly in matters concerning identification controls, checking transactions, operational risk management, the prevention of conflicts of interests, the prevention of the fraud, the fight against money laundering and financing of terrorism);
- the necessity to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- our legitimate interest, which may concern:
 - improving the provision of the Service to you;
 - effectively and efficiently administering and managing the operation of our business;
 - preventing misconduct or fraud;
 - establishing statistics and tests;
 - internal policies and procedures;
 - advertising and communications on our services.

5. Disclosure of your personal data to third parties

5.1 Disclosure of your personal data to IT service providers of Unifiedpost

We may disclose your personal data to the following third parties to enable us to provide you the Services in accordance with the Terms of Use:

- Hosting providers;
- IT Service Providers performing generic support and maintenance services on our internal infrastructure.

5.2 Disclosure of your personal data to other companies of Unified Post Group

We may disclose your personal data to other companies of our group for the purposes of:

- managing and administering our business and the business of other companies of our Group;
- complying with the functions that each of them may perform relating to regional or global departmental or corporate decisions;

- assessing compliance with applicable laws, rules and regulations, and internal policies and procedures across our business and businesses of companies of our Group;
- complying with regulatory and compliance requirements that govern our business and the business of other companies of our Group;
- satisfying the requirements of government bodies.

5.3 Disclosure of your personal data to third-party applications service providers

We may disclose your personal data to third-party applications service providers for the provision of the Service, such as:

- Accounting software packages;
- Billing and invoicing management platforms.

Your personal data may be disclosed to third-party applications service providers for the purposes of:

- managing and providing the Service to you as well as to allow for added services which would allow the simplification of your business processes related to reconciliation of invoices and payments, follow up and projection of cash flows, providing advice on management of cash flows and other;
- managing our banking relationship;
- entrusting certain operational functions to our other entities or to service providers chosen for their expertise and reliability to provide specific services.

We will take steps to ensure that the personal data is accessed only by third-party applications service providers that have a need to do so for the purposes described in this Data Privacy Notice.

5.4 Disclosure of your personal data to other third parties than third-party applications service providers

We may also share your personal data to other third parties than third-party applications service providers mentioned in this Data Privacy Notice:

- other payment services providers, such as your online bank account provider or credit card issuer;
- if we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer for due diligence purposes;
- if we are acquired by a third party, in which case personal data held by us about you will be disclosed to the third-party buyer;
- if required by third-party agents and contractors for the purposes of providing services to us, including insurance companies, IT and communications providers, law firms, accountants and auditors. These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this Data Privacy Notice;
- if required for the compliance with regulatory purposes that govern our business and that of other companies of our Group;
- if required for the compliance with the requirements and requests of official organs and administrative or judicial authorities of a country, located within or outside the European Economic Area, whose legislation on the protection of personal data is different from that of the European Union;
- if disclosure of your data is required for the compliance with any legal obligation or in order to establish, exercise or defend our legal rights.

6. Transfers of your personal data outside the European Economic Area

The personal data that we process may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by individuals operating outside of the EEA who work for a company of our Group or for one of our suppliers.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways:

- the country that we send the data to might be approved by the European Commission as offering a sufficient level of protection; or
- the recipient may be party to binding corporate rules (relevant to intra-group transfers only); or
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details about the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contacting us” section below.

7. Retention of your personal data

Your personal data will be kept no longer than necessary in relation to the purposes for which they were collected or otherwise processed.

How long we hold your personal data for will vary. The retention period will be determined by the following criteria:

- the purpose for which we are using your personal data – we will need to keep the data for as long as is necessary for that purpose (we will keep your personal data for the duration of the provision of the Service to you and for the duration required to preserve your rights under the Terms of Use);
- legal obligations: laws or regulations may set a minimum period for which we have to keep your personal data;
- the procedures for the identification of fraud;
- existing or potential litigation.

You acknowledge and accept that personal data can be kept after the Service has been terminated for a period of six (6) months for the purpose of the continuity of the provision of the Service.

8. Your rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- where you have actively provided your consent for us to process your personal data, the right to withdraw your consent at any time;
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible; please note that this right only applies to personal data which you have provided to us;
- the right to request that we rectify your personal data if it is inaccurate or incomplete;

- the right to request that we erase your personal data in certain circumstances; Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- the right to request that we restrict our processing of your personal data in certain circumstances; Again, there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request; and
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contacting us” section below.

You can find out more information about your rights by contacting the data protection regulator in your jurisdiction, the Belgian Data Protection Authority (“Autorité de protection des données” or “Gegevensbeschermingautoriteit”), rue de la Presse 35, 1000 Brussels, or by searching their website at www.autoriteprotectiondonnees.be or www.gegevensbeschermingautoriteit.be.

9. Data security

We take all reasonable physical, technical and organisational measures needed to ensure the security and confidentiality of personal data, particularly in view of protecting it against loss, accidental destruction, alteration, and non-authorized access.

10. Updates

This Data Privacy Notice will be updated from time to time to reflect changes and the most recent version will be available on the intranet or may be requested by contacting us as set out below.

11. Contacting us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions, comments and requests to privacy.payments@unifiedpost.com
