



## PRIVACY POLICY

### 1. Introduction and Scope

Cardlay A/S (“Cardlay”, “us”, “we” or “our”) operates, among others, [www.cardlay.com](http://www.cardlay.com) and [www.vattax.com](http://www.vattax.com), the Cardlay mobile app and the Cardlay Prepaid Mastercard (together the “Services”).

This privacy policy (the “Privacy Policy”) applies to all Services offered by us and it applies to all information collected via customers’ use of our services and our websites.

Cardlay takes the processing of information very seriously and is committed to full compliance of all relevant laws and regulations. To fulfil such obligations, Cardlay has concluded this Privacy Policy to inform on how Cardlay collects, uses, discloses, protects or otherwise processes information.

Cardlay will not use or share your information with anyone except at described in this Privacy Policy.

### 2. Amendments

We may amend this Privacy Policy at any time by posting a revised version at [www.cardlay.com](http://www.cardlay.com) or by otherwise notifying our customers. The revised version will be effective at the time it is posted/notification is given and consequently we recommend that you revisit the website periodically to review this Privacy Policy.

### 3. Personal Data Collected

While using our Service we may ask you to provide us with certain personal data. Personal data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly by reference to the Personal Data. The Personal Data collected by Cardlay may include, but is not limited to:

- Name
- Address
- Email
- Date of birth
- Payment card details
- Receipts, invoices and other submitted items.

#### **4. Use of Personal Data**

We use personal data to provide the best possible service. Here are some examples of how we use Personal Data:

- to provide customer service
- to communicate upcoming features, developments and news related to our Services
- to manage your card account
- to provide our Services and for assessment and analysis (including identity verification and market and product analysis)
- to protect and investigate fraudulent, unauthorised or illegal activity
- to develop and improve our products and our Services to you.

We will not disclose any of your Personal Data to any third party except as listed below:

- to fraud prevention agencies and other organizations who may use the information to prevent fraud and money laundering
- to our suppliers or service providers that process data on our behalf and/or which provide products and services to us to assist us in providing our own products and services to you
- to the institution which issued your prepaid card (and which is a member of the card scheme)
- to anyone to whom we transfer or may transfer our rights and duties under the Subscription Terms
- as required by law or regulation
- to your employer, where the card has been provided to you for use in the course of your employment
- to other entities within the Cardlay group of companies.

Further, we may disclose personal data to third parties in and outside Denmark where such disclosure/processing is for hosting and storing, compliance purposes or fraud prevention. Disclosure of Personal Data may also be made to perform other parts of our services and managing the customer relationship, including, but not limited to public authorities and/or cooperation partners such as service providers.

When we are required or permitted to disclose information, we will only disclose Personal Data which is necessary to fulfil the purpose.

The Personal Data will be stored no longer than necessary to carry out the specific purpose for which the Personal Data was collected.

#### **5. Cookies**

We use cookies to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

## **6. Security**

Cardlay is committed to handle Personal Data with high standards of information security. We use computer safeguards such as firewalls and SSL software encryption for many Services to protect Personal Data provided to us.

Only employees that need to access Personal Data will have access to Personal Data. Cardlay informs and trains all employees about the importance of privacy and security practices.

For the avoidance of doubt, Cardlay shall in no event be liable for any loss that you may incur as a result of malfunctions, errors, security breaches or any other reason.

## **7. Other Information Collected by Cardlay**

We also collect information which is not related to an identifiable person.

When you visit the Cardlay website, we may collect your IP address and standard web log information, such as your browser type and the pages you accessed.

We process such non-personal information in order to provide and manage the Services, which includes transactions, customer service, website optimisation etc. We also process information with the purpose to detect and prevent fraud and violations of our legal agreements and to fulfil technical, financial, tax, compliance and administrative functions.

We will not sell, transfer, lease or lend any non-personal information to third parties for their marketing purposes without your consent. However, in order for us to offer our Services; enhance the quality of our' Services from time to time; and protect the interests of our customers, we will in limited circumstances share some of your information with third parties.

Further, we will from time to time disclose and process any non-personal information about you as may be required by law, regulation, including any applicable tax regulation or market rules, or a legislative or supervisory authority or another person who is entitled by law to demand such disclosure, without prior notice from you.

We may also disclose and have processed any non-personal information about you to third parties in and outside Denmark where such disclosure/processing is for administrative or compliance purposes or fraud prevention or made with a view to enabling the transfer of funds initiated by you or performing other parts of our Services and managing the customer relationship, including, but not limited to public authorities and/or cooperation partners such as service providers.

## **8. Miscellaneous**

In case you have any questions or comments to this Privacy Policy please contact us by email to [legal@cardlay.com](mailto:legal@cardlay.com) or by telephone +45 3115 8000.

Information collected through Cardlay will be treated in accordance with current Danish legislation and guidelines from the Data Protection Agency.