

PRIVACY POLICY – NEONOMICS AS

1. General

- 1.1. This privacy policy (the "**Policy**") applies when Neonomics AS, reg. no. 919 041 021, Torggata 15, 0181 Oslo, Norway, ("**Neonomics**"), provides financial services for Digital Service Providers that you access via the web or an app.
- 1.2. Neonomics is a third-party provider and is authorized by the Financial Supervisory Authority of Norway to deliver Payment Initiation Services ("**PIS**") and Account Information Services ("**AIS**").
- 1.3. With your consent, we enable Digital Service Providers to connect to your bank and gain access and use your bank accounts, including related personal data.
- 1.4. To use our services, you must be at least 18 years of age and / or otherwise be authorized to enter into contracts and agree to be bound by this Policy.
- 1.5. As stated in Neonomics Terms of Use; by using our service, you duly authorize Neonomics as a Payment Initiation Service Provider ("**PISP**") and / or as an Account Information Service Provider ("**AISP**") to access your online bank accounts acting on instructions from you.
- 1.6. Data processed by Neonomics' services will be processed in accordance with applicable legislation, valid guidelines issued by the Norwegian Data Protection Authority and Neonomics' concession from the Norwegian Data Protection Authority.

2. When do we process data?

- 2.1. Neonomics processes personal data in the following situations:
 - When Neonomics provides PIS as a designated PISP for a Digital Service Provider to connect to your bank's system and accounts to make payments directly from your bank account.
 - When Neonomics provides AIS as a designated AISP for a Digital Service Provider to provide account information from your bank.

3. Legal basis for processing your personal data

- 3.1. **Consent:** Neonomics may process your personal data when you have given your consent to a bank or a Digital Service Provider for whom we act as AISP or PISP to:
 - o Initiate payments
 - o Retrieve your account information
 - o Provide such account information to Digital Service Providers
- 3.2. **Performance of a contract:** Neonomics may process your personal data when it is necessary for the performance of an agreement with a Digital Service Provider on your behalf.
- 3.3. **Compliance with law:** Neonomics may process and store your personal data when it is necessary to comply with a legal requirement to which Neonomics is bound by law.

4. Purpose of processing of personal data

4.1. Neonomics processes personal data for the following purposes:

- To fulfil the contractual obligations undertaken by Neonomics to implement the Agreement with a Digital Service Provider on your behalf.
- Prevention and identification / exposure of criminal acts.
- In addition, Neonomics will process personal data beyond the prescribed when provided by law or to the degree you have consented to such processing.

5. Neonomics as Data Controller

5.1. Neonomics is the Data Controller of the personal data you provide or that is obtained when the Digital Service providers use our services on your behalf.

5.2. Neonomics act as a Controller for the handling of personal data as outlined in this Privacy Policy.

5.3. When Neonomics act as a Controller, Neonomics is responsible for processing your personal data in accordance with the current applicable regulation and this Privacy Policy.

6. Neonomics as a Data Processor

6.1. When the Digital Service Provider uses its own PISP or AISP license, Neonomics is the Data Processor for the personal data you provide or that is obtained when you use our services.

6.2. If you have given your consent to a Digital Service Provider that uses its own license, the Service Provider will act as a Controller and is responsible for the personal data you have given us in connection with the registration or your ongoing customer relationship. In this regard you should check your service provider's rules on data privacy.

6.3. Neonomics is obliged to protect and store your personal data in accordance with applicable legislation when acting as a Processor.

7. How do we process data?

7.1. When using our services, we will process your data to make actions on your behalf, with your consent. You provide your consent to your bank in the process of signing up to a Digital Service Provider who uses the Neonomics platform. The scope of your consent is decided in the agreement between you and your bank. The extent of your consent may include among other things:

- Access to retrieve account information
- Which accounts and what account data you allow access to by a Digital Service Provider
- Initiate payments
- Which operations the Digital Service Provider can perform (e.g. payment)
- For how long the consent will be valid

7.2. Your bank will require consent for each new Digital Service Provider that Neonomics act as a role of a data processor for on your behalf.

8. Which data does Neonomics process about you?

8.1. When you authorize Neonomics to access your bank through your consent and when a Digital Service Provider uses our services on your behalf, we will have access to your personal data.

8.2. Neonomics collects and processes your personal data, such as:

- Names
- Account information
- Account balances
- Transactions
- Payments
- Availability of Funds

Neonomics will not collect special categories of data – such as information about your race, political opinions, religion, health or sexual orientation – unless you have chosen to provide that information to us.

9. Securing personal data

9.1. Personal data collected by Neonomics shall be processed and stored in a safe and secure manner. Neonomics has established and documented procedures and measures to ensure satisfactory data security regarding confidentiality, integrity and accessibility in accordance with applicable laws and regulations.

10. Storage of personal data

- 10.1. Neonomics can only store your personal data for as long as necessary to fulfil our purposes, which we have described in paragraph 4 in this Policy. For example, if you are using our Payment Initiation Service, we will only store the personal data we collect and process in this regard until the transaction has been finalized.
- 10.2. We will subsequently delete or anonymize your personal data, unless we are required by law to store the data. Neonomics is required by law to store and archive, or information needed to protect Neonomics' legal interests, for instance in the event of an ongoing legal proceeding. We are also required by our Payment Institution license to store payment tokens for 10 years (for the purpose of Anti Money Laundering and Anti-Terrorist Financing). Payment tokens are used to protect sensitive data by replacing it with an algorithmically generated number.
- 10.3. We will regularly check whether we have any personal data which must be deleted. However, as we process your personal data for the purposes described in paragraph 4, the actual period for which the personal data is stored will vary depending on those specific purposes.

11. Disclosure of personal data

- 11.1. Information that can be linked to you personally will not be shared with others unless it is founded on the law or if you have specifically agreed thereto.
- 11.2. Neonomics does not sell or rent any personal data to anyone.

12. Transfer of personal data outside the EU / EEA

12.1. Neonomics do not transfer personal data outside the EU / EEA.

13. Your rights

13.1. You have the right to ask us to provide any personal data we have collected about you, to you. Should you wish to do so, please email us at privacy@neonomics.io to make a subject access request detailing:

- Your name
 - Your address
 - The details of your bank or Digital Service Provider, and
 - The period of data you'd like access to
- 13.2. You have the right to restrict and / or stop our processing of your data. You may at any time object to Neonomics' processing of your personal data due to particular circumstances.
- 13.3. You have the right to withdraw all or some of your given consent from any time.
- 13.4. You have the right to file a complaint to the Norwegian Data Protection Authority if you are not satisfied with our processing of your personal data. You will find the Norwegian Data Protection Authority's contact details on www.datatilsynet.no.

14. Amendments

- 14.1. Neonomics can make amendments to this Privacy Policy to comply with statutory requirements and Neonomics' own procedures for collecting and processing data. If significant amendments are made we will notify you by email. In that case you will have to approve the terms and conditions again.

15. Questions and Contact Information

- 15.1. For all inquiry: privacy@neonomics.io. Our Data Protection Officer ("DPO") is Anders Philer. Complaints to DPO: dpo@neonomics.io. Web: www.neonomics.io. Any privacy issues regarding our webpages: admin@neonomics.io Address: Neonomics AS, Torggata 15, 0181 Oslo, Norway. Business registration no. 919 041 021.

16. Versions

- 16.1. This version of the Privacy Policy was last updated in December 2019.
