**Gropay Privacy Policy** 

Last update: 22 June 2018

Gropay BV, ("Gropay", "we"), Netherlands registration number 32.12.9357, Tolweg 3 VI, 3741LM Baarn, The Netherlands is responsible for the use and processing of your personal data shared with us in accordance with this privacy policy and in compliance with the relevant data protection Regulation and laws. The coverage of this policy is limited to data that we collect / process online. Data collected / processed from job application candidates is not covered by this policy. We have a separate privacy policy for job application candidates. If you are a job application candidate please obtain a copy of our "Privacy Notice For Job Applicants" from your Gropay contact.

Gropay is concerned with your privacy and strives to protect your identity.

It is Gropay's intention to comply with current laws and policies concerning privacy. This document is being provided to inform you, among other things, of what kind of information is being collected by Gropay and how it is processed.

This Policy sets out the procedures that are to be followed when dealing with personal data.

# What type of personal data do we process?

We process functional cookies when you visit our website. These are divided into two broad categories:

Google cookies used to improve your experience on our site Cookies related to our real time online chat functionality

These cookies primarily capture your IP address.

We also collect your name, email address, phone number and comments on how we could help you when you either sign up for our newsletters or submit a query through the Contact Us or Free Consulting options on our website.

# How do we use personal data?

We use functional cookies from Google to improve your experience on our site and also to improve our site, our products and our services by analysing

your browsing pattern. These Google cookies may also be used by Google and its partners to deliver advertising to you at our request.

We use cookies related to our online chat functionality to deliver an online chat service to you.

We use information that you submit to us through our online forms like our newsletter sign up form, our contact us form and our free consulting form to deliver the products and services you have requested.

In the case of the newsletter sign up form we will use the information you submit via this form to deliver our regular newsletter to you at the email address you provide.

In the case of the contact form we will use the information you provide to make contact with you as per your request.

In the case of the free consulting form we will use the information you provide to make contact with you and to prepare before this contact on how we could help you.

The information you provide and that we collect may also be used for marketing purposes by sending out marketing letters, emails and SMS to you as a customer. All marketing messages are sent in accordance with applicable law and we ask for your consent to receive promotional offers from us. You may opt-out of receiving these message at any time by sending your request to <a href="mailto:unsubscribe@gropay.com">unsubscribe@gropay.com</a> or by following the opt-out instructions in each message.

We may also process your personal data for purposes of preventing fraud and similar types of criminal activity as well as complying with legal requirements, i.e. in accordance with measures against money laundering and funding of terrorist organizations. We may disclose your personal data to government authorities if subject to a subpoena or other valid court order.

Your information may further be used to analyze purchasing patterns in order to provide you with relevant marketing and account information and also to enhance our website and services, solutions and processes. This may also include transferring your personal data to third party suppliers. We may also share your personal data with service providers who provide products and services on our behalf (e.g., direct marketing, printing and distribution). If and when we transfer your personal data to a third party, we will do so only in accordance with this privacy policy and applicable law.

Such third parties are required by us to apply the same or greater protections to your personal data than are provided for in this privacy policy.

#### Transfers outside the EEA

Gropay may transfer, process and store information about you on servers located in a number of countries. Accordingly, Gropay may share your information with other selected partners, or subcontract processing to, or share your information with, third parties located in countries other than your home country in order to carry out the activities specified in this privacy policy. Your personal data may therefore be subject to privacy laws that are different from those in your country of residence. Information collected within the European Economic Area ("EEA") and Switzerland may, for example, be transferred to and processed by third parties identified above, located in a country outside of the EEA and Switzerland, where you may have fewer legal rights in relation to your information. However, if we do transfer your personal data collected within the EEA to third parties outside the EEA, such transfer will be based on the safeguards either of the standard contractual clauses issued by the EU Commission, or the EU-U.S. Privacy Shield or comparable legally permissible mechanism.

In the event that parts, or the entirety of Gropay's operations are sold or integrated with another entity, your personal data may be provided to our advisers, potential buyers and their advisers, and be handed over to the businesses' new owner.

### How do we protect your personal data?

To make sure your personal data is safely stored, a number of security measures are in place. Gropay has implemented safety routines, both technical as well as organizational measures to protect your personal data. Firewalls and necessary antivirus software are all in place to protect the information from being subject to hacker attacks or malware and access to data by unauthorized agents. Access to the spaces in which the data is stored is limited and requires employee identification (or identification of agents working on our behalf) for access. Gropay also uses SSL (Secure Socket Layer) which is a protocol for secure transfer of data on the Internet (or other networks). The customer should control that the SSL function is not de-activated in the browser settings.

By law we have appointed a representative to oversee the application of our privacy policy. Any concerns over the retention, use or disclosure of your information can be addressed to them via privacy@gropay.com.

### How long do we store your personal data?

The information is stored for as long as it is needed in accordance with legal requirements, for example to avoid the organization from being used for money laundering purposes or financing of terrorism. Your personal data may also be stored for the purposes of fulfilling Gropay's commitments to you and for maintaining the customer relationship such as fulfilling delivery and warranty commitments.

Your information is never stored for longer than what is legally permitted under current legislation.

## Access, updating and change of your personal data?

As a customer you have the legal right to obtain information regarding what personal data is stored about you regardless of how the data has been collected. If you make such a request we will ask you to verify your identity and possibly ask you to give us more information about such a request. We may need to charge a nominal fee for this service for administrative purposes. We will only refuse your request if we are legally permitted or required to do so. If this is the case then we will give you reasons for doing so. To make a request for information, please contact us.

Gropay wants to ensure that your personal data is correct and up to date. If any of the information you have provided has changed (i.e. change of email address, name), please notify Gropay by sending an email to: privacy@gropay.com. You have the right to request that information is corrected, blocked or deleted at any time. Under the right to erasure you can also request for deletion of your file, although you should be aware that in some circumstances we may not be required or able to do so, particularly where your file also holds information about our clients or financial information that we need to keep for regulatory or legal reasons; i.e. which relate to tax matters. If, under any circumstances, we cannot comply with your request for information we will provide a full explanation as to why this is so.

If you explicitly indicate that you do not wish your personal data to be used for marketing purposes, it will not be. You have the right to withdraw permission granted with regards to your personal data at any time. Opt-out instructions are included above and in every marketing message we send out.

#### Notification of a Data Breach

All personal data breaches are handled immediately. If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of Data Subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the data protection officer must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it. In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of Data Subjects, the data protection officer must ensure that all affected Data Subjects are informed of the breach directly and without undue delay. Data breach notifications shall include the following information:

- The categories and approximate number of Data Subjects concerned;
- The categories and approximate number of personal data records concerned
- The name and contact details of Gropay's data protection officer (or other contact point where more information can be obtained);
- The likely consequences of the breach;
- Details of the measures taken, or proposed to be taken, by Gropay to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

#### Links

Our website may contain links to other websites. When you navigate away from our website by clicking on one of these links, you are no longer protected by this privacy policy. Please be careful when visiting other sites as their privacy protections may not be as robust as our own. We encourage you to read the privacy policies of any third party website carefully before using it. Note that Gropay does not take responsibility for the handling of your personal data by other websites unless expressly noted.

# Changes to the privacy policy

Gropay reserves the right to make changes to this privacy policy at any time to the extent these changes are needed to resolve issues or to stay compliant with new legal requirements or technical requirements. All changes to the policy will be posted on our website. Please check this privacy policy each time before using other parts of the website to see if there have been any changes and to ensure you still agree to these terms. If required by law, we may also notify you of changes by email.

### Cookies

Gropay's webpage uses cookies. Cookies are text files which are stored on a visitor's computer that make it possible to track the visitor's activity on the webpage. Our cookie policy can be viewed at https://gropay.com/gropay-cookie-policy/

# **Questions?**

If you have any questions or concerns about this privacy policy or how Gropay uses your personal information, please contact Customer Service, via privacy@gropay.com.