

# Privacy policy

## 1. Introduction

External privacy policy for MXNEY ApS hereinafter referred to as (“MXNEY”) respects the need for the protection of individuals with fundamental rights and freedoms, including their right to the protection of personal data.

It is natural for us to give high priority to data security and confidentiality. We process personal information that we are entrusted with, properly and responsibly.

In this external privacy policy, you can read how we handle the information we process when you are a customer with us, visit our website and/or otherwise share your personal information with us. This external privacy policy applies when we process personal data as a data controller. This policy has been developed in accordance with the Data Protection Regulation.

Our legal information:

MXNEY ApS

CVR-nr. 41086661

Wildersgade 51, 3.

1408 København K

Would you like further information about how we handle your personal information or would like to contact our data protection officer? Email us at [support@mxney.io](mailto:support@mxney.io).

## **2. You and your data**

If you share personal data that is not about yourself, for example about an employee, business partner, director, owner, you must have the necessary permission from the other person and confirm that they understand how we use their data.

### **2.1 The information come into possession of**

#### **2.1.1 Information from direct interactions**

Information we have about you and people associated with your business usually comes directly from you, for example when you apply for funding. This information will include:

- Our own research of your company's shareholders (including real owners), suppliers, and companies you use or may have agreements with
- Other directors, partners, real owners, or employees of your company
- Persons authorized to act on your behalf

#### **2.2 Information shared via our website**

- Information you provide when investigating whether you are eligible for funding or making an application. This information includes, for example: name, home address, date of birth, e-mail, telephone number, geographical location.
- Details of your business including industry, business size, financial information to investigate the possibility of funding.

- The login information and settings you choose for the website and your card so you can use these securely.
- Your IP address for security reasons.
- When you use the mobile version of our site, we may collect your device ID so that we can share it with companies that help us advertise online.

### **2.3 Information we collect if you make contact**

We collect the following information so that we can answer your questions:

- The phone number you call from and the information you give us during the call
- The email address you use and the content of this email and any attachments.

### **2.4 Information we collect when you use our services**

We collect the following information in order to offer you the service in a safe and lawful manner and to continue to develop it. This includes:

- Details about payments to and from your MXNEY account
- Details on how you use our website.

### **2.5 Information we receive from external sources**

When applying for funding:

- We are forced to confirm your identity and check if you are registered as a bad payer

- We may request access to the platforms you use to run your business (such as banking, advertising and accounting) and use the shared data to determine eligibility and monitoring.

### **3. Reasons to use your information**

European data protection laws say that we must have a legal basis for using your personal data. At least one of the following must apply: contractual or legal obligation, legitimate interest, public interest, vital individual interest or consent. In this section, we explain which we trust to use your data in a particular way.

#### **3.1 We need to use your data for a contract we have with you or to enter into a contract with you. We use information about you to:**

- Consider your application
- Provide you with the services we agree on in accordance with our terms and conditions
- Send you messages about your account and other services you use if you contact, or we need to tell you about something
- Exercise our rights under contracts we have entered into with you, such as managing and recovering money you owe us
- Investigate and resolve any complaints and other issues that may arise

#### **3.2 Vi er nødt til at bruge dine data til at overholde loven. Vi:**

- Confirm your identity when you sign up or contact us

- Check your information with fraud prevention agencies
- Avoid illegal activities such as money laundering, tax evasion and fraud
- Keep records of information we have about you in accordance with legal requirements
- Comply with bank laws and regulations (these mean that we sometimes need to share customer information with regulators, law enforcement or other third parties)

### **3.3 When it is in our legitimate interest**

We have to use your data for our legitimate interests or the interests of a third party. This means using data in a way that you may expect from us, for a reason that is in your and / or our (or a third party's) interest and that does not infringe your privacy rights. We:

- tell you about products and services via the website or other channels, such as social media, based on how you use our products and services and other information we have about you. We do this so that we can ensure useful marketing.
- track, analyze, and improve the services we provide to you and other customers and how you respond to the ads we display. We may ask for feedback if you have shown interest in a service. We do this so we can improve our products and understand how we market them.
- perform security and maintenance checks to ensure that our site and other services run smoothly for you
- manage MXNEY's business and financial affairs and protect our customers and staff

- share information with credit bureaus so we can take advantage of up-to-date information when making lending decisions so they can help us deliver our services

### **3.4 Consent**

We request your consent to:

- tell you about our products and services and our partners if we think they are of interest to you.
- Share information about you with companies we work with when we need your permission (see 'Whom do we share your data with' below)

You do not have to share information about yourself if you do not want to. However, if you do not, you may not be able to use some (or any) of our services.

You can unsubscribe from us by email.

### **4. Whom we share your data with**

Companies that provide us with services. By this, we mean companies that help us provide services that you use and that need to process details about you for this reason. We share as little information as possible and encrypt and/or make it impossible for you to be identified by the recipient where possible (for example, by using a user ID instead of your name).

- suppliers, of our online payment solution
- card manufacturers and networks, such as MasterCard
- Know your customer (KYC) and anti-money laundering (AML) service providers who help us with identity verification or fraud control
- cloud solutions such as Dropbox

- our provider of business information and analysis platform
- companies that help us with marketing
- software companies that we use for email

#### **4.1 Anyone, you give us permission to share it with.**

- companies that introduce their services through MXNEY's website
- tools for transferring payment account information
- your bank, sales, advertising, accounting, or other business platforms to determine eligibility and monitor performance such as Google and Shopify
- people you have asked to represent you, such as lawyers

#### **4.2 Law enforcement and other external parties**

We may share your information with:

- authorities that find and stop economic crime, money laundering, terrorism and tax evasion if the law says we must or if it is necessary for other reasons
- police, courts or dispute resolution bodies if we have to
- other banks to help track money if you are a victim of fraud or other crime, or if there is a dispute over a payment
- any other third parties where necessary to fulfill our legal obligations

We may also share your information with individuals or companies if there is a business reorganization, merger or acquisition.

## **5. How long do we keep your data?**

We store most of your data for as long as you use MXNEY, and for 5 years after the law,

In special circumstances, such as in the event of money laundering or fraud, we may retain data longer if we need to (it is in our legitimate interest) and/or the law says we must.

To find out how long we keep different data categories, we consider why we have it, how sensitive the data is, how long the law says we should keep it, and what risks are associated with it.

## **6. Your rights**

You have the right to:

- access the personal data we have about you or get a copy of it
- request a copy of your personal data
- make us correct incorrect data
- ask us to delete your data, but for legal reasons, we may not be able to do so
- companies that help us with marketing (but we do not share identifiable personal data with third parties for their own direct marketing unless you give us permission and you can opt-out at any time)
- withdraw the consent you have previously expressed



To do this, please contact us via the website or by sending an email to [support@MXNEY.io](mailto:support@MXNEY.io). EU data protection laws, give us a month to respond.

## **7. Where we store or send your data**

We may transfer and store the data we collect from you to organizations outside the European Economic Area ('EEA'). When we do this, we make sure that your data is protected and that:

- The European Commission states that the country or organization has adequate data protection, or
- we agree on standard data protection clauses approved by the European Commission with the organization.
- If you would like a copy of the relevant data protection clauses, please send an email to [support@MXNEY.io](mailto:support@MXNEY.io)

## **8. How to file a complaint**

If you have a complaint about how we use your personal information, please send an email to [support@MXNEY.io](mailto:support@MXNEY.io) and we will do our best to solve the issue.

If you are still not satisfied, you can refer your complaint to a data protection authority in the EU country where you live or work or where you believe a breach has occurred.

## **9. Changes to this Policy**

We publish any changes we make to this policy on this page, and if the changes are significant, we will notify you by email.

/MXNEY, marts 2021