



Getswish Privacy Policy

2019-1

1.0 Getswish a controller or a processor of your personal data

Getswish AB, with company registration number 556913-7382, located at Drottninggatan 26, 111 51 Stockholm ("Getswish"), owns, manages and develops the service of Swish, including the Swish-app and Swish payment products ("Swish"). By providing Swish, Getswish will get access to and process your personal data as a processor acting on behalf of your bank (payment institution), but in some limited cases also as Controller for example when you provide information to us via our web-site, e-mail or in any other way. Getswish respects your personal privacy and will handle your personal data in accordance with current law and regulations for personal data protection. This policy helps you to understand the types of information Getswish may handle when you e.g. use Swish, and how this information is used and protected. The use of Swish may involve several parties. This policy relates only the processing of personal data carried out by Getswish and its subcontractors.

2.0 Processing of personal data

2.1 Your Swish agreement

In order to use Swish, you must enter into an agreement with a bank (payment institution), offering Swish services. Such bank will collect data about you and is thus the controller who is responsible for the lawful processing of your personal data. Getswish is the processor acting on behalf of such bank and in accordance with such bank's instructions. In this capacity Getswish, or our subcontractors, will store and process some of your personal data, such as name, mobile number and social security number. Name is required to enable exposure of name in various functions such as private payment request and blocked sender. The social security number is required for authentication when you identify yourself using BankID. For more information we recommended that you also read your bank's privacy protection policy.

2.2 Accesses to your mobile phone

Personal data will be collected and generated upon your enrolment to use Swish. For security reasons Swish will also use an identification number to identify your mobile phone. In order to further improve functionality in the Swish-app you may choose to give accesses to other information such as:

- List of contacts – enabling you to send money to your contacts.
- Photos and camera – enabling you to scan or open QR codes.
- Mobile data – enabling you to use Swish when you are not connected to a wireless network.
- Notifications – enabling Swish to send messages to your mobile phone for example when you receive a payment.
- Information about location – enabling use of Bluetooth to connect the Swish App to e.g. payment/POS terminals.

The above data will only be used by the Swish-app in your mobile phone. Getswish will not have access to the data.

2.3 Representative of a legal entity cooperating with Getswish

As a representative of a bank (payment institution) offering Swish services, a merchant with a Swish agreement, a technical supplier to Getswish or another party providing services related to Swish, you may be required to register with Getswish and thus provide personal data such as social security number, name, address, telephone number, in order to obtain information, administer certificates etc. We need the information for authentication when you identify yourself using BankID, to ensure that you at each time are authorized to access the relevant information, administer the certificate etc. and to administer our relationship.



2.4 Processing of other information

When you apply for employment, register to receive information about Getswish or our products and services, enter into an agreement or otherwise contact Getswish, you consent to our processing of provided personal information for the purpose in question.

3. Purpose of processing personal data

Your personal data will be processed in accordance with the Data Protection Regulation 2016/679 (EU) ("GDPR") and the bank secrecy regulations. The purpose of processing your personal data is to fulfil obligations under the Swish agreement, for example to ensure effective Swish functionality, authentication and security purposes, and obligations as prescribed by law or as otherwise needed to achieve the purpose of your contact with Getswish and your provision of personal data to us.

Your personal data will only be kept for as long as is required to meet the purpose of the processing thereof. Some data must be stored due to obligations prescribed by law which means that some personal data will be stored up to 10 years. If the processing of your personal data is based on your consent, we will only keep your data for as long as you wish.

4. Disclosure of personal data

Your personal data will be shared with others as stipulated in your Swish agreement or as required in order to ensure effective Swish functionality, as an example, information about you will be sent to the recipients of your payments, or as otherwise needed to achieve the purpose of your contact with Getswish.

When your personal data is shared with subcontractors acting on behalf of Getswish, the transfer of personal data will be in accordance with processor agreements which, among other things, prevent the processors from using the data for any other purposes than set forth in the Swish agreement, in this policy or your bank's privacy protection policy.

We may transfer your personal data if it should be required by law or regulation, we might for example be required to provide information to the police, tax authorities or supervisory authorities.

5. Privacy and Security measures

The protection of your personal information is important to us. We have taken comprehensive technical and organizational security measures to protect your personal information from unauthorized disclosure, accidental or unlawful destruction, loss or alteration. Our employees and subcontractors have strict instructions to handle all personal data according to current laws and regulations for personal data protection. Further, we will handle your personal data only within EU/EEA.

6. Your rights

You have the right to request information about any personal information relating to you and held by us, regardless of how this information is gathered. Requests for such information must be made in writing. The request must be sent to Getswish AB, Drottninggatan 26, 111 51 Stockholm Stockholm when Getswish is the controller. When Getswish is processor you will send the request to your bank directly.

Further, you have the right to request rectification or erasure of your personal data or restriction of certain processing of such data, and to lodge a complaint with the Swedish Data Protection Authority (DPA). If our processing of your personal data is based on your consent you may withdraw such consent at any time.

7. Contact us

If you have any questions concerning this privacy protection policy, please do not hesitate to contact Getswish AB, send an e-mail to admin@getswish.se or send a letter to the above address.