

AltaPay Cookie & Privacy Policy

Please read this privacy statement if you would like to know more about the way AltaPay collect and further process your personal data and how cookies are used.

It is important to us that your personal data is treated with care and that you are well informed about the way we process your personal data. We have written this privacy statement to tell you which data we process, how, why and how long we do this for and to inform you about your rights. When you visit the AltaPay website hosted by AltaPay, correspond with us, are (or are in the process of becoming) one of our merchants or partners, we process personal data about you.

Version as of January 2021

1 Who is AltaPay?

AltaPay is a fintech company headquartered in Denmark. AltaPay offers an international omni-channel payment solution for online, mobile and in-store, creating transparency and reducing the need for manual tasks with one centralized payment platform. AltaPay's platform automizes, simplifies, and protects the transaction flow for shop owners and global retail and e-commerce companies, supporting and integrating smoothly into the major ERP-systems. AltaPay performs as a Payment Service Provider operating under The Payment Card Industry Data Security Standard (PCI DSS). This means that AltaPay handles payments for merchants via credit card, bank transfer, and other payment methods.

2 When, Why and How do we process your data?

2.1 When you visit and use our website

When you browse our website, we process your IP address, Google Analytics ID, internet browser and device type, location data and your use of our website, including which pages you visited, how you got to our website, the time and length of your visit and your language preferences. For this we use Google Analytics. We use this data for our legitimate interests of making sure our website works properly, including debugging, to be able to deliver you content and for DDOS mitigation on our website, and improving our website and to perform statistical analyses for optimizing our website.

We use cookies and similar techniques, such as tags/beacons and java scripts, which are small text files stored on your device. Using cookies is a way for us to make sure that our website is continuously improved, meets your needs and can be used as a tool to optimize our marketing strategy. For us to do this, we place functional cookies to make the website function as well as marketing cookies which help us target the right people and show them advertisements. Some of these cookies track your use of our website and visits to other websites and allow us to show you advertisements when you browse other websites.

Please refer to section three (3) for more information on our use of cookies.

We use plugins on our website from social media networks such as LinkedIn. You can recognize these plugins by their logos. Our plugins will not collect personal data about you unless you click on these logos. If you click on them, these plugins are activated and automatically transmit data to the plugin provider. We do not have any influence over which data these providers collect from you, and we are also not aware of the extent of their data processing. If you would like more information about their data processing, this can be found in the respective privacy policy on the websites of these providers.

When we collect information about how you use our website, such as which landing pages you visit and which items you look at, we do so in order to decide how we could best provide our services to you. For example, if you read about our products and services on our website, we might classify you as a user or a website visitor who is interested in our products and services and therefore as a potential merchant or

partner. Based on the audience we expect you belong to, we may act, for example by contacting you with offers about our products and services, if we have your consent for this.

In order to make the most accurate assessment about which audience you likely belong to, and as you can also read in our Cookies Policy, we also use tracking cookies. These cookies track information about how you use our website and which other websites you visit, for example to show you advertisements if we suspect that you might be interested in our products and services. We only place these tracking/targeting cookies with your prior consent. For more information about these tracking cookies, please view our Cookies Policy.

2.1.1 How long do we keep this data?

We will always only keep your data for as long as we reasonably need it for the purposes listed above. For example, data about your visits to our website will be retained until your use or browsing session ends, except where it concerns data collected for the analytical and marketing purposes specified above. In those cases, we will keep your information for 1 year after collection, except if you have become a customer with AltaPay (see section 2.3).

2.2 When you contact us or request us to contact you

You can contact us by calling us or e-mailing us using for example the contact details listed on our website. If you do so, we will collect your name, company, and contact details needed to be of further assistance to you and/or communicate with you.

Via our website, you can ask to be contacted to become a merchant. When you do this, we collect the information that you fill out, including your name, company, contact details, the reason you are contacting us, who has referred you to us, verification that you are not a robot, consent, and other information you decide to provide us

We collect this data in our CRM system and/or our Support system. We use this data above to answer your question, comment or complaint and respond to your queries and (support) requests. As such, this data is used by us to establish or perform our (future) contract with you and for our legitimate interests in following up with you. We also use the data above for our legitimate interest of conducting business with you and managing our internal administration, for training purposes, for establishing and performing our contract with you, for our legitimate interest of conducting marketing research so we can improve our products and services and to be able to offer our (future) merchants tailored products and services.

2.2.1 How long do we keep this data?

Data about any questions, comments or support requests you have made to us, we will only keep your data for as long as we reasonably need it for the purposes listed above which will be at least two years.

2.3 When you are, or are in the process of becoming, an AltaPay customer

If you are involved in the buying process and in signing up to become one of our customers by entering into a merchant agreement with AltaPay, we collect the information we need to establish and perform a contract with you, including your contact information.

We use this information to set up our products and services for you, including technical support, the onboarding process, integration to our platform, helping you with settings in the AltaPay gateway, POS terminal field services and to replace old/damaged POS terminals, and other actions which need to be taken to establish or perform our contract with you.

We ensure collection of the information you need to establish an acquiring agreement with acquiring banks and/or alternative payment methods. They have an obligation to act in compliance with national and international laws, regulations and sanctions and to prevent fraud, money laundering and financing terrorism. The acquiring banks are active in the financial sector, they are not allowed to accept just

any customer without checking them and they have to determine and report when suspicious transactions take place. Therefore, if you are applying for an acquiring agreement, you need to provide up to date information and documents to:

- Verify your identity,
- Identify the ultimate beneficial owners of your business,
- Identify the purpose and intended nature of your future business relationship with us,
- Monitor your behavior and transactions using automated systems which detect risks and verify the origins of your capital/assets,
- Check whether a natural person representing you is competent to do so (and verify the identity of this person), and
- Check whether you act on behalf of yourself or on behalf of a third party.

To carry out the above checks, we pass this information to an acquirer (including personal data) that you have provided to us and other information created by your use of the AltaPay services. This may include your name, your contact information, a copy of your identification document, the address of your legal representative and shareholders, your company bank account numbers, information contained in correspondence between us, bank statements, your signature and an extract of your company registration document.

We also collect data about your use of our products and services, including your login details, and the questions, queries, comments and complaints you send us in relation to our business relationship. We process this data to be able to perform our contract with you by following up with you and providing you with support and for our legitimate interest of being able to optimize and improve our products and services.

We can also use your (company) e-mail address for: keeping you up to date with our products and services; making you offers tailored to your needs (meaning similar products and services you have already purchased from us); or inviting you to events. We may use third party identification and verification services in order to assist us to verify your identity and the documents provided to AltaPay.

We use this data to ensure the safety and integrity of the financial sector by aiming to identify, prevent and counter illegal conduct and to comply with our legal know-your-customer and anti-money laundering obligations, for example under The Danish Financial Supervisory Authority (Finanstilsynet) and The Financial supervisory Authority of the Acquiring Banks.

2.3.1 How long do we keep this data?

If you are or soon to become one of our merchants, we will keep information relating to our business relationship until 5 years after the end of your contract with us. If you are not engaging in any contract or agreement with AltaPay we will keep your data based on your consent. Any information provided to us for the purposes of entering an agreement with an acquiring bank via 3rd party providers by yourself, you are responsible for erasing yourself. Any additional information which we may possess that required for entering into an agreement with an acquiring bank agreement will be erased upon rejection of your application (exceptions applies see next paragraph).

Data we have collected in relation to our legal obligation to verify our customers will be kept by us for as long as we are legally obligated to, which is generally 5 years after end of relationship. We may also share some of your information with competent authorities and/or regulators in case this is required to comply with the obligations of our acquiring partners as a financial institution, for example for the purpose of preventing money laundering and terrorist financing. Please also refer to section Your Rights.

2.4 When you sign up for our newsletter and or for other marketing material

You can sign up for our newsletter or receive invitations to events using your name and e-mail address. When you sign up, you indicate your consent to receive our newsletter and invitations. You can at any time unsubscribe from receiving these e-mails by following the instructions provided in the newsletters. If you are one of our merchants, we may contact you in relation to relevant products or services, for our legitimate interest of developing our business. We can do this via e-mail or phone.

If you are not yet one of our merchants, we will only contact you, if we have consent from you, for example via e-mail, with offers or about our products or services. When we contact you in this context via e-mail, you always have an opportunity to opt out.

2.5 Other purposes

If necessary, we can also process any of your information above for our legitimate interest of protecting our legal rights, for example in connection with legal claims, and when we have a legal obligation to process your information. We may also transfer your data in the event of a company reorganization, merger, or sale.

2.5.1 How long do we keep your information?

We will always only keep your data for as long as we reasonably need it for the purposes listed above. The retention terms above can be longer if we are required to keep data longer based on applicable law or to administer our business. If we need to keep any information longer for our legitimate interest of protecting our legal rights, we will keep the necessary information for this purpose until the relevant claim(s) has/have been settled.

2.6 With whom do we share this information?

We need the help of third parties to be able to offer you our website and our products and services. Where necessary we will share your information with our service providers and professional advisers (e.g. IT providers, KYC partners, CRM providers, marketing support providers, customer service providers, and legal service providers). We have concluded data processing agreements with our service providers to protect your personal data.

If our business is sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business. Otherwise we will not share your information with any third party, unless we have your permission, (for instance with the partner who referred you to us), where this is necessary in connection with the purposes above or with legal claims or when we have a legal obligation to do so.

2.7 How do we protect your data?

We are committed to securing your personal data and have taken steps in this regard. In order to prevent unauthorized people or parties from being able to access your data, we have put in place a range of technical and organizational measures to safeguard and secure the information we process from you.

AltaPay performs as a Payment Service Provider operating under The Payment Card Industry Data Security Standard (PCI DSS), where the international card companies have set up some security standards that apply to all card payments. The standard deals with rules for the environment (payment terminal/ payment solutions/ systems/ network) where the merchants and their service provider/ processor handle and store card data. PCI DSS describes the requirements that apply for all merchants transmitting, handling or storing card data. The standard applies for Visa, Mastercard, American Express, Diners, Discover, JCB and Dankort (in Denmark).

2.8 Your Rights

You are entitled to object to us processing your personal data, including profiling. You may also ask us for an overview of your information or ask for a copy. You may also request us to correct or delete certain data, restrict processing of your data, or ask us to transfer some of this information to other organizations. In some cases, you may object to the processing of your data and, where we have asked for your consent to process personal data, you can withdraw this consent at any time. Where we process your data for our legitimate interests, you can contact us if you want more information about these.

There are some exceptions to these rights, however. For example, it will not be possible for us to delete your data if we are required by law to keep it or if we hold it in connection with a contract with you. Similarly, access to your data may be refused if making the information available would reveal personal information about another person or if we are legally prevented from disclosing such information. If you wish to exercise any of these rights, please contact us using the details below.

3 Cookies

AltaPay NV ("AltaPay" or "we") wants to ensure that your visit to our website is smooth, reliable and as useful to you as possible. To help us do this, we use cookies to make our website relevant to your interests and needs.

3.1 What are cookies?

Cookies are small text files that are automatically placed on your computer, tablet, mobile phone or other device ("device") when you visit our website. They are stored by your internet browser and may contain basic information about your device or internet use. Your browser sends these cookies back to our website every time you revisit it, so we can recognize your computer or mobile device and personalize and improve your browsing experience.

3.2 What type of cookies do we use?

The cookies we use fall into 3 categories. These categories are described below:

Essential and functional cookies:

Essential and functional cookies: Essential cookies are necessary for the proper functioning of our website and to help you access and move around our site and use all its features. We also use functional cookies, for example to remember your language preferences to save you the trouble of having to change these every time you enter our website. Without these cookies, our website would not work properly and you would not be able to use certain important features.

Name	Domain	Purpose	Lifetime	Technique
acceptCookie	altapay.com	This cookie is used to keep track of your consent to cookies.	1 year	Cookie

Analytics cookies:

We use cookies to help us understand how visitors arrived at our website, how and how long they use it and how we can improve their experience. This type of so-called "analytics" cookies can provide us with information to help us understand which parts of our website interest our visitors and if they experience any errors. We use these cookies to test different designs and features for our sites and we also use them to help us monitor how our visitors reach our sites.

We use Google Analytics to place and read cookies for the abovementioned use. We have changed our Google Analytics settings to further protect your privacy. For example, we have made sure that the last octet of your IP-address is invisible and have turned off the setting which allows sharing data with Google. We are also not using any other Google Analytics related cookie services which are offered by Google.

Name	Domain	Purpose	Lifetime	Technique
_ga	altapay.com	This cookie is used while running experiments on the website (such as A/B-testing) to identify which version of the website the visitor is seeing.	2 years	Cookie
_gat	altapay.com	This cookie is used to distinguish between visitors and how they use the website, which we use in order to improve our website.	1 minute	Cookie
_gid	altapay.com	This cookie is used to distinguish between visitors and how they use the website, which we use in order to improve our website.	1 day	Cookie

3.3 Withdrawing your consent

You can withdraw your consent to advertising, marketing and social media cookies by contacting us.

See further contact details in section 2.9.

3.4 Managing your cookie settings and deleting cookies

As explained above, we only place advertising and targeting cookies (including tracking cookies) if you have given us your consent for doing this. If you have given us your consent but would like the cookies that we have placed to be removed, you can do this by deleting them via your browser. Search for "cookies" under your web browser's "Help menu" or visit allaboutcookies.org for more information on how to do this. You can also enable or disable (types of) cookies via your browsing settings. For example, you can have the browser notify you when you receive a new cookie, delete individual cookies or delete all cookies. Most advertising networks offer you a way to opt out of advertising cookies.

See the [Digital Advertising Alliance Consumer Choice](#) and [Your Online Choices](#) pages for useful information on how to do this.

Please note that, if you choose to delete #AltaPay cookies, your access to some functionality and areas of our website may be degraded or restricted.

2.9 Contacting us, questions, and complaints

Questions, comments, requests or complaints concerning this privacy notice and the way we process your personal data are welcomed and can be addressed to our Data Protection Officer at dpo@altapay.com. If you have a complaint about the way we handle your personal data, you also have the right to address this with the data protection authority of the country in which you live or work or the country in which we are located.

If you have any questions regarding cookies or if we can help you with something, we would be happy to assist if you contact us at: [AltaPay Support](#).