

AIIA PRIVACY POLICY

1. In General

- 1.1 In this Privacy Policy, "AiiA", "we", "us", and "our" refers to AiiA, product owned and operated by AiiA A/S, with the registered address at Artillerivej 86, st. tv., 2300, Copenhagen, Denmark. When using the AiiA service, including the services provided by AiiA and the AiiA website (the "Service"), your personal data is processed in accordance with this policy. Please note that terms defined in the AiiA Terms of Use are applicable to this Privacy Policy when such defined terms are used.
- 1.2 Data processed in relation to the Service will be processed in accordance with applicable legislation, including the General Data Protection Regulation (GDPR) and the at any time valid guidelines issued by the Danish Data Protection Agency.

2. Data Controller

- 2.1 We are the data controller of personal data used in connection with the following activities and services in relation to the Service:
- Profile
 - Account Information Service
 - Payment Initiation Service
 - Anonymisation and statistics
 - Logging etc.
 - Support etc.

3. What processing is performed?

3.1 Profile/user

3.1.1 Data

When creating a profile with the AiiA Service, you must as a minimum enter your e-mail address. One-time users do not have to create a profile.

We store information, also regarding One-time users, on the consents you have provided to us, e.g. allowing us to collect Account Information from your Accounts, and to transfer this information to third-party services of your choice. When you make use of Payment Initiation, due to anti-money laundering legislation, we will electronically collect information about you from your Account provider. We may also collect information such as your identity, identity of the beneficial owners and/or senior management, including copies of documents if necessary.

3.1.2 Purpose

Your personal data is collected in order to register and identify you as a user and to provide our Services to you. We use your e-mail address to forward single-use passwords to you. We also collect your personal data to be able to contact you if it is necessary to confirm your information, answer your questions, and provide customer service to you, and with your consent we may also send newsletters, messages about new features and other material related to Aiiia to your e-mail address and/or via push messages.

We also collect your personal data in order to comply with applicable legislation, comply with governmental requirements, comply with internal policies, and to enforce our Terms of Use. Finally, we collect your personal data in order to pursue available legal remedies and limit liability in case of any disputes.

3.1.3 Legal basis

Our legal basis for processing said personal data is that the processing of the data is required for us to provide our Services to you (GDPR art. 6 (1)(b)).

When we collect information about you, due to anti-money laundering legislation, the legal basis for this is the Danish Act on Measures to Prevent Money Laundering and Financing of Terrorism, section 11 (GDPR art. 6 (1)(c)).

3.2 Account Information Service

3.2.1 Third-party services

3.2.1.1 Data

When using Aiiia, you may add information on third-party services to your profile, to which we forward your Account Information.

For One-time users only information on the third-party service which was used is associated with the One-time user.

3.2.1.2 Purpose

The information on which third-party services you have associated with Aiiia, and the consents you have provided us is your personal data.

We collect such data in order to provide our Service to you, including being able to forward your information to such third-party services in accordance with your choice.

3.2.1.3 Legal basis

Our legal basis for processing your personal data regarding third-party services is your consent (GDPR art. 6(1)(a)).

3.2.2 Accounts and Account Information

3.2.2.1 Data

When using Aiiia, you associate your Accounts with third-party services in your profile. The information on your Accounts, and which Accounts you have associated with which third-party service in Aiiia is your personal data. For One-time users such information is only associated with the One-time user, and only regarding the third-party service used.

In order to associate an Account with third-party services, you may need to provide information on your log-in credentials or security credentials for the online service provided by the Financial Institution in question. Such log-in credentials or security credentials are stored in tokens. Depending on the Financial Institution, the log-in credentials or security credentials may be your usual log-in credentials, in other situation the credentials may be chosen by the Financial Institution.

Account Information, being information on account name, balance and transactions regarding the Accounts you have chosen, is collected and stored by the Service.

We may, depending on the Account Information obtained, also perform data wash, i.e. clean-up, enrichment and reformatting on your Account Information. We may also categorise the transaction information from your Accounts.

3.2.2.2 Purpose

Aiiia collects such information in order to provide the Service to you, i.e. being able to connect and collect your Account Information from the Accounts of your choosing.

Your Account Information is collected by Aiiia in order to be able to forward information to the third-party services you choose to have such information forwarded to.

Since Aiiia is i.a. a data-storage and data sharing service, we collect Account Information 2 years back from the time of consent, and store Account information for up to 2 years, in order to be able to provide your Account Information to the third-party services of your choice also back in time, and for you to be able to share the same Account Information with more than one third-party service. For One-time users Account Information will be stored for up to 24 hours, see section 6.

3.2.2.3 When performing data wash and categorisations, this is due to us being able to provide third-party services with Account Information in a standardised format and to be able to provide information on categories of transactions, for the use of such third-party services.

3.2.2.4 Legal basis

The legal basis for collecting and processing information on your Accounts and your Account Information is your consent (GDPR art. 6(1)(a)).

3.3 Payment Initiation

3.3.1 Data

When you use the Service to initiate payments, we store information on your requests to initiate payments on your behalf.

The data used for initiating a payment on your behalf and which is your personal data is: identification information, e.g. name, contact information, information on your Account provider and account number, information about the payee of the payment you initiate, as well as data needed for communication with your Account provider.

3.3.2 Purpose

Your personal data is collected in order to identify you as a user and to provide our Payment Initiation Services to you.

We also collect your personal data in order to comply with applicable legislation, comply with governmental requirements, comply with internal policies, and to enforce our Terms of Use.

When you choose “remember me” after a payment has been initiated, we will remember your bank and in some cases your account number in a safe way such that it is faster for you to pay next time.

3.3.3 Legal basis

Our legal basis for processing said personal data is, that the processing of the data is required for us to provide our Services to you (GDPR art. 6 (1)(b)).

When choosing “remember me”, we process such data based on your consent (GDPR art. 6 (1)(a)).

When we collect information about you, due to anti-money laundering legislation, the legal basis for this is the Danish act on anti-money laundering § 11 (GDPR art. 6 (1)(c)).

3.4 Anonymisation and statistics

3.4.1 Data

We may make an anonymous copy of your Account Information. Such anonymous copy of your Account Information is not referable to you and is after anonymisation no longer personal data.

3.4.2 Purpose

The purpose of making an anonymous copy of your Account Information is for us to be able to make statistics, without infringing your right to privacy.

3.4.3 Legal basis

The legal basis for making an anonymous copy of your Account Information, is our legitimate interest in doing so (GDPR art. 6(1)(f)).

3.5 Logging, fraud detection etc.

3.5.1 Data

Aiia logs whenever the Service is used by you or anyone else. The log contains information on which profile is logged into, or which One-time user is used, the IP-address used, your overall geographical location, the time and date, which action has been performed and device information, i.e. information on operating system, browser information and settings.

Further, whenever a third-party service accesses the Service a similar log is created.

Aiia also monitors Payments Initiations for anomalies such as unusually high frequency of failed initiations, unusually high frequency of successful initiations, unusually high amount of initiated payments or if payments are initiated from an unusual geographical location.

3.5.2 Purpose

The purpose of logging access to the Service is for us to make technical analysis, improvements and optimization of our Service.

Further, logging and fraud detection is performed by us, to track and hinder any possible illegal activities and abuse of the Service, including detecting and investigating possible fraud.

3.5.3 Legal basis

The legal basis for our logging is our legitimate interest in making improvements and optimisation of our Service, as well as our legitimate interest in preventing and pursuing any illegal activities and possible abuse of our Service (GDPR art. 6(1)(f)).

When logging and collecting personal to detect and investigate possible fraud and abuse, the legal basis is the Danish act on payments § 126 (GDPR art. 6(1)(c)).

3.6 Support and error correction

Based on your enquiry, we provide support in connection with your use of our Service. We always strive to correct errors in the Service.

3.6.1 Data

When providing support, we may have a need for accessing any information in your profile, information on which third-party services you have associated with your profile, which payment you may have initiated, which Accounts you have associated with which third-party services, and logs.

If we have a need for accessing your Account information or payments which you have initiated when providing support, we will ask for your explicit consent for this by e-mail to the e-mail address which is associated with your profile. Without such explicit consent, we may not be able to assist you.

When performing error correction, select employees of ours are authorised to access any information, in order to perform such assignment.

3.6.2 Purpose

The purpose of accessing your information is to provide support and resolve any challenges you may have encountered using the Service, or to correct errors in the Service.

3.6.3 Legal basis

The legal basis for accessing your information, is our legal interest in supporting your need for assistance or conducting error correction (GDPR art. 6(1)(f)).

If we access your Account Information or information on initiated payments, when providing you support, the legal basis is consent (GDPR art. 6(1)(a)).

4. Recipients/data disclosure

4.1 The personal data which we process, will not be disclosed to third parties without your consent, except as described in this Privacy Policy, unless we are legally required to disclose the data, or if disclosure is necessary for us to protect ourselves or to enforce legal claims.

4.2 When you add third-party services to Aiiia, we will transfer the agreed Account Information to such third-party service, in accordance with your choosing. For One-time users, we will only forward the agreed Account Information to such third-party service used.

4.3 When using payment initiation, we will transfer your payment initiation order to your Account provider. Such information is identification information on you, your account number, the amount and your log-in credentials or security credentials, information on the payee, and the account number of the payee. We may also transfer information about the payment initiated by you, including a reference number of the transaction and other information related to the initiated payment and amount to the payee.

5. Data retention

5.1 We generally store your personal data until your Aiiia profile is deleted, unless otherwise stated below. Information on One-time users is generally stored for up to 24 hours.

5.2 Information on which consents you have given us is stored for as long as the consent is used + 3 years.

5.3 Account Information, i.e. information on transactions, is deleted no later than 2 years after the date of entry of the transaction in question. However, if your Aiiia profile is deleted, all your Account Information is deleted. For One-time users we may store your Account Information for up to 24 hours.

- 5.4 Information regarding Payment Initiation, including payment requests, user IP, payment initiation consent, identity of the end user, account information of receiver account, account information of sender account, is stored for 15 months.
- 5.5 Information collected due to anti-money laundering legislation is stored for 5 years after the business relation terminated, according to the statutory requirements in the Danish act on anti-money laundering § 30.
- 5.6 Information in logs is stored for up to 1 year.
- 5.7 If required to comply with legal requirements or to protect our legal interests, we may store data for longer periods in specific situations.
- 5.8 In some cases, instead of deleting your personal data, Aiiia may anonymize this, cf. also section 3.4. When such data has been anonymized, it will no longer be attributable to you, and hence no longer be personal data.

6. Privacy Rights

- 6.1 In accordance with the General Data Protection Regulation, you have certain legal rights, due to our processing of your personal data. These rights are:
- At any time, you have the right to know what personal data we process about you; the purpose of the processing; from where your personal data was obtained; and the identity of any recipients of your personal information.
 - At any time, you have the right to rectify incorrect or misleading personal data that we are processing about you. You can correct personal information, such as your name, e-mail address, etc. in your profile on the Aiiia website.
 - In certain cases, you may require that the personal data we are processing about you about you are deleted.
 - At any time, you are entitled to receive a copy of the personal data you have provided to us, in a commonly used and machine-readable format.
 - You may at any time object to us processing your personal data due to your particular circumstances.
 - At any time, you may object to our use of your personal data for direct marketing purposes, e.g. forwarding newsletters.
- 6.2 If you wish to make use of one or more of legal rights, as mentioned above in section 7.1, or wish for us to assist you with this, please contact our DPO, cf. section 12.

7. Transfer of personal data outside the EU/EEA

7.1 Aiiia uses certain data processors located outside the EU/EEA. Below are the entities and legal bases for the transfer of personal data.

Slack Technologies, Inc.	USA	Standard Contractual Clauses
SendGrid, Inc.	USA	Standard Contractual Clauses
Help Scout, Inc.	USA	Standard Contractual Clauses
Google LLC	USA	Standard Contractual Clauses
Postmark	USA	Standard Contractual Clauses
Zendesk Inc.	USA	Standard Contractual Clauses

7.2 The applicable legal transfer basis is the EU Commission [decision 2010/87/EU](#), regarding Standard Contractual Clauses for EU controller to non-EU processor.

7.3 Aiiia may make transfers to countries outside the EU/EEA if necessary to fulfil your request for such transfer, e.g. transfer to a non-EU/non-EEA payee. In such situations, the legal basis for the transfer will be your consent and/or the necessity of the transfer for the performance of a contract (GDPR art. 49(1)(a) and (b)).

8. Confidentiality

8.1 Aiiia always handles your personal data confidentially. Appointed employees with Aiiia have the authority to access data where it is necessary to solve operational or technical issues. If you ask for support, Aiiia employees may, with your consent, access your Account Information and/or information on payments initiated by you. All our employees are subject to strict confidentiality requirements when processing personal data.

9. Withdrawal of consent

9.1 At any time, you can withdraw the consents you have provided to us, by deleting your Aiiia profile on the Aiiia website or by contacting Aiiia. You may also withdraw one or more of your consents for collecting and forwarding your Account Information on the Aiiia website.

9.2 If you withdraw one or more of your consent(s) you may no longer be able to use the Aiiia Services in whole or in part, or one or more of the third-party services, you have associated with your profile may not work correctly or as expected.

9.3 Please be aware that when having initiated a payment such payment cannot be revoked.

10. Changes to the policy

10.1 We reserve the right to change this privacy policy at any time without prior notice. You will be informed of such changes to the policy either in the Service or by e-mail, to the e-mail address registered in your profile.

- 10.2 If we make substantial changes to our Privacy Policy, you will be asked to accept the revised privacy policy, before continuing using the Service.

11. Data Protection Officer

- 11.1 We have appointed a data protection officer who advises us regarding the processing of personal data in relation to the Service and who can guide you on how to exercise your rights. If you have any questions about this Privacy Policy or the processing of your personal data you may contact our Data Protection Officer by contacting AiiA A/S, Att.: DPO, Artillerivej 86, st. tv., 2300, Copenhagen, Denmark or dpo@aiia.eu

12. Complaints

- 12.1 If you wish to file a complaint regarding the processing of your personal data, we would like to hear from you. Our contact information can be found in section 12.1. You may also file a complaint with the Danish data protection authorities: Datatilsynet, Carl Jacobsens Vej 35, DK-2500 Valby, Denmark or www.datatilsynet.dk, or your local data protection authorities.

13. Version

This Privacy Policy was issued in April 2021 and is valid until revised by us.