



## PRIVACY NOTICE

### 1 General information

This Privacy Notice contains information required by the EU General Data Protection Regulation (hereinafter the General Data Protection Regulation) and the national data protection law for a data subject, such as for the controller's customer, employees and for the supervisory authority.

### 2 Controller and its contact information

Payment Highway Oy  
Postal address: P.O. Box 308, 00013 OP  
Street address: Gebhardinaukio 1, 00510 HELSINKI  
Controller's contact person: Arno Hietanen  
Telephone: +358 20 790 2720  
Email address: [support@paymenthighway.fi](mailto:support@paymenthighway.fi)

### 3 Data Protection Officer's contact information

OP Financial Group's Data Protection Officer  
OP Financial Group  
Postal address: P.O. Box 308, 00013 OP  
Email: [dataprotection@op.fi](mailto:dataprotection@op.fi)

### 4 Name of the personal data file and data subjects

Customer data file for Payment Highway service. Payment Highway is a payment gateway for merchants' mobile applications, web applications and web shops.

Data subjects include persons acting on behalf of corporate customers and persons acting on behalf of potential corporate customers. Potential customers are, for example, subscribers to newsletters and participants in various events.

### 5 Purposes of personal data processing and legal basis for processing

#### 5.1 Purposes of processing

The service requires processing the personal data of those acting on behalf of the company. The controller processes data included in the data file mainly for producing, providing and delivering the service. Below you can find more detailed information on how personal data is used in the data file.

The purposes of personal data use include:

- customer service and customer relationship management and development, including customer communications
  - production and delivery of services, and development and quality assurance of services
  - business development
  - monitoring and analysis of service use and customer segmentation in order for the controller to be able to offer features and services suitable to corporate customers
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- opinion polls and market surveys
- direct marketing for corporate customers
- targeted marketing and advertising for corporate customers
- fulfilling statutory obligations and any other official rules and regulations
- risk management
- ensuring the security of services and investigating abuses
- training purposes

5.2 Legal bases of processing

The table below describes the legal bases of processing personal data used by the data file and provides examples of processing performed on each basis.

Legal basis	Example
<b>Contractual relationship or actions preceding the conclusion of a contract</b>	Personal data is processed in the data file mainly on a contractual basis to provide and deliver the service acquired by the company represented by the data subject.
<b>Consent</b>	Direct marketing through an electronic channel is usually based on the consent of the data subject.  Delivery of the newsletter is based on consent.
<b>Legitimate interests of the controller or a third party</b>	Direct marketing and business development are often based on the controller's legitimate interest.  The controller may disclose information to the other personal data files of OP Financial Group entities on the basis of legitimate interests.  In most cases, the controller's legitimate interests are based on the customer relationship or similar relationship between the controller and the data subject. The controller ensures that the processing performed on this basis is proportionate to the data subject's benefits and meets his/her reasonable expectations.

6 Categories of personal data

Persons acting on behalf of potential customers

Category of personal data	Data content of the category
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<b>Basic information</b>	Data subject's name Data subject's email address Data subject's phone number
<b>Customer relationship information</b>	Information that uniquely identifies and classifies the customer
<b>Customer activity data</b>	Tasks and transactions related to the management of the customer relationship
<b>Behavioural information (incl. information collected using cookies and other such technologies)</b>	Tracking of the data subject's online behaviour and use of services using, for example, cookies. The collected information may include a website browsed by the user, the device model, unique device and/or cookie ID, channel such as an application, mobile browser or web browser, browser version, IP address, session ID, session time and duration, and the display resolution and operating system.
<b>Recordings and content of messages</b>	Recordings and messages in various formats, in which the data subject is a party, for example, chat recordings
<b>Technical verification data</b>	Identifier determined by a device or an application, with which the user of the device or application can be identified, using additional information if necessary

Persons acting on behalf of customers

<b>Category of personal data</b>	<b>Data content of the category</b>
<b>Basic information</b>	Data subject's name Data subject's email address Data subject's phone number
<b>Customer relationship information</b>	Information that uniquely identifies and classifies the customer
<b>Consents</b>	The consents given and withheld by the data subject concerning personal data processing
<b>Contract and product information</b>	Information on contracts between the controller and the company represented by the data subject
<b>Customer activity data</b>	Tasks and transactions related to the management of the customer relationship



<b>Behavioural information (incl. information collected using cookies and other such technologies)</b>	Tracking of the data subject's online behaviour and use of services using, for example, cookies. The collected information may include a website browsed by the user, the device model, unique device and/or cookie ID, channel such as an application, mobile browser or web browser, browser version, IP address, session ID, session time and duration, and the display resolution and operating system.
<b>Recordings and content of messages</b>	Recordings and messages in various formats, in which the data subject is a party, for example, chat recordings
<b>Technical verification data</b>	Identifier determined by a device or an application, with which the user of the device or application can be identified, using additional information if necessary

## 7 Recipients and recipient groups of personal data

### 7.1 Data recipients

Any personal data collected may be disclosed within OP Financial Group as permitted by law and to the relevant authorities in cases prescribed by law.

When disclosing personal data included in the data file, the controller takes into account the requirements of mandatory legislation.

### 7.2 Transfer of data to suppliers

The controller uses suppliers which process personal data for its account. The controller concludes appropriate agreements on personal data processing with such suppliers.

The suppliers provide the controller with information system services, among other things. Some of the controller's suppliers are other OP Financial Group entities.

### 7.3 International transfers of data

The controller uses suppliers in personal data processing, and data will be transferred outside of the EU or EEA to a limited extent.

Data transfer outside of the EU / EEA takes place using Privacy Shield to guarantee appropriate personal data protection.

## 8 Personal data retention period or criteria for determining the period

The controller processes personal data during the validity of the contractual relationship. Once the contractual relationship has terminated, the controller will erase or anonymise the data after around five years in accordance with the erasure processes it follows.

The data of the representatives of potential customers will be erased in around six months' time of the date of the transaction or contact or as soon as the data subject wants. For newsletter subscriptions, personal data will be erased after the cancellation of the newsletter.



After the contractual relationship has terminated, the controller may process the personal data for direct marketing purposes in accordance with applicable legislation.

## 9 Personal data sources and updates

Personal data is collected primarily from the data subjects themselves. Personal data may also be collected from the company represented by the data subject and when the data subject uses certain controller services, such as online services.

Personal data can also be collected and updated within the limits permitted by law from the personal data files of third parties, examples including:

- personal data files maintained by the authorities
- other customer data files of OP Financial Group entities.

## 10 Data subject's rights

Data subjects have the right to receive the controller's confirmation of whether their personal data will be processed or not, or whether they have already been processed.

If the controller processes a data subject's personal data, the data subject has the right to receive the information in this document and a copy of the personal data being processed or already processed.

The controller may charge a reasonable administrative fee for additional copies requested by the data subject. If the data subject submits a request electronically and has not requested any other form of delivery, the data will be delivered in a commonly used electronic format, provided that the data can be delivered in a secure manner.

The data subject also has the right to request the controller to rectify or erase their personal data and prohibit the processing of their personal data for direct marketing purposes.

After the application of the General Data Protection Regulation has begun, the data subject will, in certain cases, also have the right to request the controller to restrict the processing of their personal data or to otherwise oppose the processing. In addition, under the General Data Protection Regulation, the data subject may request that the data they have provided themselves be transferred in machine-readable format.

All of the above requests must be submitted to the abovementioned contact person of the controller.

If a data subject considers that his/her personal data is not processed legally, he/she has the right to file a complaint with the supervisory authority.

**11 Right to cancel prior consent**

If the controller processes the data subject's personal data on the basis of consent, the data subject has the right to cancel such consent. The cancellation of consent does not affect the lawfulness of processing performed based on the consent prior to its cancellation. Such cancellation may, however, have an effect on the usability and functionalities of the service.

**12 Protection methods regarding the data file**

The controller processes personal data securely and in a manner fulfilling the requirements of applicable laws. It has carefully assessed the risks that may be associated with the processing and taken the necessary measures to manage these risks.

The controller has protected the data appropriately in technical and organisational terms. The data file is protected using, for example, the following tools:

- Protection of equipment and files
- Access control
- User identity verification
- Access rights
- Registration of usage events
- Processing guidelines and supervision

The controller also requires that its suppliers and other partners ensure appropriate protection of the personal data to be processed.