



QLIRO'S PRIVACY POLICY

Qliro AB (reg. no. 556962-2441) ("Qliro", "we", or "us") is the data controller for the processing of your personal data in accordance with the EU General Data Protection Regulation, also known as GDPR. We are a credit market company supervised by the Swedish Financial Supervisory Authority (*Finansinspektionen*).

This privacy policy is addressed to natural persons, whose personal data is processed by Qliro, whether you are acting as a representative of a company or other legal entity, or as a consumer ("customer(s)", "you", "your" or "yours").

This privacy policy describes what type of information Qliro collects and processes when you apply for a credit with us or our savings account, makes a purchase with a merchant using our checkout solutions for merchants, as well as when you are in contact with us or visits our website.

This privacy policy also describes why we use your personal data, how we use it, where we collect it from, how we may share it with other parties, and your rights under the GDPR and how you can exercise those rights. You can always contact us with questions regarding privacy and data protection; see our contact information in section 1 below.

1. CONTACT DETAILS OF THE DATA CONTROLLER

| | |
|-----------------------------|---|
| Company Name: | Qliro AB |
| Organization Number: | 556962-2441 |
| Mailing Address: | Sveavägen 151 113 46 Stockholm, Sweden |

| | Customer Support Sweden | Customer Support Norway | Customer Support Finland |
|---|---|---|---|
| Phone Number: | +46 200 430 030 | +47 800 69 300 | +358 20 770 506 |
| Email: | kundservice@qliro.com | kundeservice@qliro.com | asiakaspalvelu@qliro.com |
| All contact channels (incl. chat): | https://qliro.com/for-shoppers/support | https://qliro.com/no/for-kunder/support | https://qliro.com/fi/asiakkaille/support |

2. HOW AND WHAT INFORMATION DO WE COLLECT?

As a credit market company, we regularly receive and process several types of personal data in connection with our financial services operations, for example in connection with granting of consumer credits, provision of savings accounts and provision of payment services. Further, we provide a checkout solution for merchants ("Qliro Checkout") for the purpose of the merchant accepting online and instore payments from the merchant's customers in the merchant's stores and we receive and process several types of personal data in connection therewith in order to process your payment for your purchase at the merchant's store.

"Personal data" refers to any information relating to you as an individual that can directly or indirectly identify you, such as your name, email address and personal identification number.

"Processing" refers to any operation performed on personal data, such as collection, use, processing, organization and storage.

2.1. PERSONAL DATA YOU PROVIDE TO US

We process personal data that you provide to us directly when you sign up as a customer of our financial services, or when you make a purchase with a merchant using the Qliro Checkout. For merchants signing up to use the Qliro Checkout and our financial services, we may process your personal data if you are a representative of such merchants.



We also process personal data generated when you use our financial services or pay through the Qliro Checkout, or that accumulates from your use of our website or our app.

We may also process personal data we obtain directly from you, for example when you send emails to us or communicate with us through other channels, such as telephone or our chat, when you sign up for newsletters or other marketing materials, or when you sign up for an event organised by us.

You may directly or indirectly provide us with the following categories and types of personal data:

| Category of Personal Data <i>Used in section 3 below</i> | Type of Data Point/Personal Data |
|--|---|
| Identification Data | Name, birth date, social security number, and necessary identifiers when logging in with eID, etc. |
| Contact Data | Email address, billing and delivery address, phone number, etc. |
| Financial Information | Information about your income, any credits, balance on savings and credit accounts, negative payment history, information about payments such as invoice information, external and internal payment, credit history (from credit checks), payout account, transaction history, transaction category, etc. |
| Generated Information | Information on how you use our products and services, including user ID, cookies showing how you reached the product/service, usage patterns in the Qliro app and on our website, etc. Generated information can also include information you provide when you communicate with us, such as recordings from phone calls with us or communication via any of our digital channels, etc. |
| Information about Goods/Services | Details regarding the goods/services you have purchased from merchants, the merchant where the purchase was made, as well as product information and other details about your order, etc. |
| Device Information | Information about your device, such as language settings, IP address, time zone, and your geographical information. |
| Information Required by Law | Personal data required for basic or enhanced customer knowledge and anti-money laundering and prevention of other crimes, information about tax residence, etc. <i>Information required by law can be retrieved from or compared with data from the Tax Agency, sanction lists, or compilations of politically exposed persons (PEP) to prevent, for example, money laundering.</i> |

2.2. PERSONAL DATA WE OBTAIN AND PROCESS FROM THIRD PARTIES

For our financial services customers, we may also process personal data obtained from third parties to complement or verify information you provided, such as public registers, credit reference agencies, or to obtain information of your order from the merchant with whom you made the purchase using Qliro Checkout.

The following categories of personal data are obtained from third parties:

| Category of Personal Data <i>Used in section 3 below</i> | Type of Data Point/Personal Data and Providing Third Party |
|--|---|
| Identification Data | Name, birth date, personal ID number, and necessary identifiers when logging in with eID, etc. <i>Your identity details can be received from merchants connected to our services and you are logged in with, as well as public and other available sources such as the Tax Agency's population register and government personal address registers.</i> |
| Contact Data | Email address, billing and delivery address, phone number, etc. |

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| | <i>Your contact details can be received from merchants connected to our services and you are logged in with, as well as public and other available sources such as the Tax Agency's population register and government personal address registers.</i> |
| Financial Information | <p>Information about your income, any credits, balance on savings and credit accounts, negative payment history, information about payments such as invoice information, external and internal payment, credit history (from credit checks), payout account, transaction history, transaction category, etc.</p> <p><i>Your financial information can be received from credit reporting companies or credit registers when we need to assess your creditworthiness and confirm your identity.</i></p> |
| Information Required by Law | <p>Personal data required for basic or enhanced customer knowledge and anti-money laundering or prevention of other crimes, information about tax residence, etc.</p> <p><i>Information required by law can be retrieved from or compared with data from the Tax Agency, sanction lists, or compilations of politically exposed persons (PEP) to prevent, for example, money laundering.</i></p> |

3. WHAT DO WE DO WITH YOUR PERSONAL DATA?

In the tables below, we explain how and why we use your personal data. For each purpose, you can see:

1. what we use your personal data for
2. what types of personal data we use
3. the legal reason under GDPR that allows us to use your personal data
4. how long we keep your personal data

3.1. WHEN SHOPPING WITH A MERCHANT USING QLIRO'S CHECKOUT

| Purpose of Processing | Category of Personal Data (obtained from you) | Category of Personal Data (obtained from third party) | Legal Basis for Processing | Storage Period |
|---|--|--|--|--|
| When you place an order online or instore with a merchant using the Qliro Checkout, we process your personal data to administer and process your payment. | <p>Contact and identification Data, such as name, birthday, social security number, address, email address and phone number</p> <p>Payment information, depending on which payment method you chose, such as credit card information (card number, date and CVV code), bank account number, telephone number</p> <p>Generated information, such as how you use Qliro Checkout</p> <p>Device Information, such as IP address, geographical information, language settings and time zone</p> | <p>Contact Data (can be received from the merchant if you are logged in, the Tax Authority or governmental address registry)</p> <p>Identification data (identifiers when you identify using eID, from our eID solution provider)</p> <p>Information about Goods/Services (received from the merchant where you place your order)</p> | <p>Qliro's legitimate interest in providing the Qliro Checkout, which enables you to complete a purchase with one of our connected merchants.</p> <p>Additionally, compliance with legal obligation to compile bookkeeping and to retain such information according to the Book-keeping Act (1999:1078).</p> | Up to three (3) years from the purchase was made, and for a maximum of seven (7) years (plus current year) to meet our legal obligations under the Book keeping Act (1999:1078). |
| To process your payment using one of Qliro's consumer credit | Contact and identification Data , such as name, birthday, social security number, address, | Identification data (identifiers when you identify using eID, from | We process your personal data to provide you with a credit enabling you to pay for | To fulfil the contract you are a party to, Qliro |



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| options (14-day invoice, Buy Now Pay Later, or Fixed or Flexible payment) when selected at checkout. Choosing this payment method means that you are applying for credit and entering into a credit agreement with Qliro. | email address and phone number Financial Information Generated information Device Information , such as IP address, geographical information, language settings and time zone | our eID solution provider) | the goods/services in Qliro Checkout. The processing is necessary to fulfil the contract you enter into when choosing one of our pay later payment methods. Additionally, we have a statutory obligation to comply with consumer protection legislation (including acting in accordance with good credit practices) and to compile bookkeeping and accounting and retain this information according to the Book-keeping Act (1999:1078), for which we also base our processing on Article 6.1(c) GDPR regarding our fulfilment of a legal obligation. | stores your personal data for three (3) years in operational systems and up to ten (10) years after the contract has ended, according to limitation rules. Thereafter, the personal data is deleted. To the extent the personal data is processed to meet our legal obligations under the Book-keeping Act (1999:1078), Qliro stores your personal data while the bookkeeping is compiled and seven (7) years after the end of the year the data was recorded. |
| When you place products in your shopping cart on a merchant's online store without completing the purchase, we process your personal data so that the merchant can follow up on such order or to engage in customer interaction. | Contact Data , such as name and email address | Information about Products/Services (received from the merchant where you placed products in your shopping cart without completing the purchase) | If you place products in your shopping cart but do not complete the purchase, we may share this information with the merchant whose website you visited. This allows the merchant to follow up with you, for example, to offer assistance, remind you about the items left in your cart, or handle other relevant customer interactions. We do this based on our and the merchant's legitimate interest in improving the shopping experience, reducing abandoned purchases, and providing relevant support. We have assessed that this interest does not override your privacy rights and that the processing is limited to what is necessary for this purpose. | For as long as required to obtain the purpose with the processing, but no longer than six (6) months after the products were placed in the shopping cart. |
| With "automatic login with the same device" in the settings for autofill | Generated information Device Information , such as language settings, IP address, | N/A | Qliro has a legitimate interest in processing your personal data to make your user | We process your personal data for automatic login |

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| in the checkout, Qliro places a cookie on your device. We process your personal data through cookies to enable automatic login the next time you visit the checkout with the same device. | time zone, and your geographical information. | | <p>experience easier through the autofill function.</p> <p>After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. We also consider the processing necessary to achieve the purpose.</p> <p>If you do not want to be automatically logged in the next time you visit the checkout with the same device, you can uncheck the box under <i>Autofill settings</i> in the checkout and confirm your choice.</p> | with the same device for sixty (60) days after you last used the checkout. |
| With “automatic filling of your personal data” in the settings for autofill in the checkout, Qliro saves your information in the checkout. We process your personal data to enable automatic autofill of your information the next time you visit the checkout, regardless of which device you use. | Contact Data , email address, phone number, zip code | N/A | <p>Qliro has a legitimate interest in processing your personal data to make your user experience easier through the autofill function.</p> <p>After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. We also consider the processing necessary to achieve the purpose.</p> <p>If you do not want automatic filling of your personal data the next time you visit the checkout, you can uncheck the box under <i>Autofill settings</i> in the checkout and confirm your choice.</p> | We process your personal data for automatic filling for sixty (60) days after you last used the checkout. |

3.2. WHEN YOU USE OUR FINANCIAL SERVICES

| Purpose of Processing | Category of Personal Data (obtained from you) | Category of Personal Data (obtained from third parties) | Legal Basis for Processing | Storage Period |
|--|---|---|--|---|
| To document, administer and fulfil the credit agreement you have entered into when choosing Qliro’s pay later option (14-day invoice, Buy Now Pay Later, or Fixed or | Contact and identification Data , such as name, birthday, social security number, address, email address and phone number Financial Information | Identification data (identifiers when you identify using eID, from our eID solution provider) Contact Data (eg to verify your address, can | The processing is necessary to offer you a credit and to enter into and fulfil the credit agreement, based on our contract with you. We also process your data to comply with legal obligations, including | Qliro stores your personal data for a maximum of 10 years after the contract has ended, according to limitation rules. To fulfil our legal obligations under the Act on Measures |

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| Flexible payment) in the Qliro Checkout. | Information Required by Law , such as information how you intend to use the account, tax residency and citizenship, and if you are a merchant, information about your representatives and beneficial owners. | be received from the Tax Authority or governmental address registry) Information Required by Law , (such as tax residency and citizenship, can be retrieved from or compared with data from the Tax Authority, sanction lists, or compilations of politically exposed persons (PEP) to prevent, for example, money laundering. | identity verification and 'know your customer' checks under the Anti-Money Laundering Act, consumer protection requirements (e.g. responsible lending), and bookkeeping duties (under the Book-keeping Act). | against Money Laundering and Terrorist Financing (2017:630), Qliro stores your personal data for five (5) years and in certain situations, up to ten (10) years. To fulfil our legal obligations under the Book-keeping Act (1999:1078), Qliro stores your personal data for seven (7) years. |
| When you apply for credit by selecting one of Qliro's pay later options at Qliro Checkout, we process your personal data to determine which pay later payment options we can offer you, we assess your creditworthiness, evaluate your ability to repay the credit, and conduct a risk analysis. The processing involves profiling and automated decision making, see further section 4 below. | Identification Data , such as name and social security number Financial Information , such as your income, existing credits, external and internal payment, transaction history etc Generated information , such as how you use our products and services | Financial Information (such as information about your income, existing credits, payment defaults, credit history and credit abuse from credit reporting companies or credit registers) | The processing is necessary to offer you a credit and to enter into and fulfil the credit agreement, based on our contract with you. Legal obligation to document responsible lending practices under the Swedish Consumer Credit Act (2010:1846). Qliro's legitimate interest in complying with the Swedish Financial Supervisory Authority's general guidelines on consumer credit (FFFS 2011:47), and in preventing fraud and misuse of credit. After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. We further assess that the processing is necessary to achieve the purpose. | To fulfil the contract you are a party to, Qliro stores your personal data for three (3) years in operational systems and for a maximum of ten (10) years after the contract has ended, according to limitation rules. |
| When you apply for a savings account with us, we process your personal data to document, administer and fulfil the savings account agreement with you. | Contact and identification Data , such as name, birthday, social security number, address, email address and phone number Financial Information , such as information about your income, account number from which you will make | Identification data (identifiers when you identify using eID, from our eID solution provider) Contact Data (eg to verify your address, can be received from the Tax Authority or | The processing is necessary to provide you with our savings account and thereby fulfil the contract you have entered into. We also process your data to comply with legal obligations, including identity verification and 'know your customer' checks under the Anti- | Qliro stores your personal data for a maximum of 10 years after the contract has ended, according to limitation rules. To fulfil our legal obligations under the Act on Measures against Money Laundering and Terrorist Financing (2017:630), Qliro stores your personal data for five |



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| | deposits into the savings account, transaction history Information Required by Law , such as information how you intend to use the account | governmental address registry) Information Required by Law , (such as tax residency and citizenship, can be retrieved from or compared with data from the Tax Authority, sanction lists, or compilations of politically exposed persons (PEP) to prevent, for example, money laundering. | Money Laundering Act and bookkeeping duties under the Book-keeping Act. | (5) years and in certain situations, up to ten (10) years. To fulfil our legal obligations under the Book-keeping Act (1999:1078), Qliro stores your personal data for seven (7) years. |
| To send you information (e.g., via email) about the service(s) you are using (not including marketing). | Contact Data , such as name and email address | N/A | The processing is necessary to fulfil the agreement for your use of our financial services. | Qliro stores the personal data for as long as the agreement with you is in place. |
| Provide you with our app or website portal, we process your personal data to visually present your purchases and give you an overview of your invoices | Identification Data Contact Data Financial Information Generated information Device Information | N/A | The processing is necessary to fulfil the credit agreement to provide you with information about your use of our service. | To fulfil the contract to which you are a party, Qliro stores your personal data for three (3) years. |
| To administer a possible return or complaint when you have made a return on the Merchant's website and a refund is to be processed to your account. | Payment Information , such as payment method or bank account number | Information about your purchase from the merchant , such as order information, amount and payment method | Qliro has a legitimate interest in processing your personal data to administer a return of funds. | Qliro stores the personal data for as long as necessary and up to three (3) years. |
| When you, as a company representative, log into our merchant web to provide services to your company, we process your personal data to manage your access and enable communication related to the services. | Contact data , such as your name, email address, job title and phone number | N/A | The processing is necessary to fulfil our agreement with the company you represent. Your personal data is processed to manage access and communication as part of delivering the agreed services to the merchants. | Your personal data is retained for as long as the company you represent remains a customer, or until you are no longer listed as a representative. After that, the data is stored for up to two (2) years before it is deleted. |

3.3 COMMUNICATION AND CUSTOMER SUPPORT PURPOSES

| Purpose of Processing | Category of Personal Data <i>(obtained from you)</i> | Category of Personal Data <i>(obtained from third party)</i> | Legal Basis for Processing | Storage Period |
|---------------------------------------|---|--|--|--|
| When you contact our customer service | Identification Data and Contact Data , such as | N/A | We process your personal data because it's necessary | To fulfil the agreement you are a party to, Qliro stores |

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| by phone, email or chat, we use your personal data to help you and handle your case. | <p>name, telephone number, email address, social security number, address</p> <p>Information about your purchase, such as payment method, delivery and your interaction with a merchant</p> <p>Device Information (only when you contact us via our chat function), such as IP address, information about your device and settings</p> | | to manage your customer service matter and fulfil our agreement with you. | your personal data for three (3) years in operational systems and a maximum of ten (10) years after the agreement has ended according to prescription rules. |
| When you contact us with general questions or queries regarding our products and services or when you submit online web forms, to respond to your question. | Contact Data , such as name, telephone number, email address. If you represent a company, we may process your title, name of the company you represent. | N/A | Qliro has a legitimate interest in processing your personal data to respond to your question. | We store your personal data for as long as relevant to respond to your question and up to six (6) months thereafter. |
| To provide you with our support and service when you, as a representative of a connected Merchant, contact Merchant Services via email or phone. | Contact Data , such as name, email address, phone number | N/A | We process your personal data because it's necessary to manage your support matter and fulfil our agreement with the merchant that you represent. | We store your personal data for as long as relevant to respond to your question and up to six (6) months thereafter. |

3.5. PROCESSING OF PERSONAL DATA THROUGH COOKIES

When you interact with our digital services, i.e., our website Qliro.com or the Qliro app, Qliro collects and processes your personal data in order to provide you with our digital services and to prevent fraud and misuse of our services.

We use cookies and similar tracking technologies to enhance the seamlessness and improve the user experience of our digital services. You can find more information about how we use cookies in our cookie policy, which you can read by following this link: [\[add link to Cookie Policy\]](#)

| Purpose of Processing | Category of Personal Data <i>(obtained from you)</i> | Category of Personal Data <i>(obtained from third parties)</i> | Legal Basis for Processing | Storage Period |
|--|--|--|--|--|
| When you visit our website Qliro.com or the Qliro app, we process your personal data to improve and customize your user experience, ensure that the content is presented correctly for you and the device you use, as well as for troubleshooting, | <p>Generated information</p> <p>Device Information</p> | N/A | <p>We have a legitimate interest in processing your personal data to improve the user experience on our website and in the Qliro app.</p> <p>After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal</p> | We process your personal data for a maximum of one (1) year. Thereafter, the personal data is deleted or anonymized. |

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| quality assurance, and testing. | | | data processed. We also consider the processing necessary to achieve the purpose. | |
| When you visit our website Qliro.com or the Qliro app, we process your personal data to prevent, detect, and stop fraud, such as someone unauthorized making a purchase in your name, a clearly altered behaviour, or to prevent misuse of our services so that they are safe and secure for you. | Identification Data Contact Data Financial Information Generated information Information Required by Law | N/A | <p>We have a legitimate interest in processing your personal data to prevent fraud or misuse of our services.</p> <p>After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. We also consider the processing necessary to achieve the purpose.</p> <p>Additionally, we have a legal obligation to, among other things, manage and report suspected and confirmed fraud, which is why we also base our processing on Article 6.1 (c) GDPR regarding our fulfilment of a legal obligation.</p> | <p>We process your personal data for three (3) years. Thereafter, the personal data is deleted.</p> <p>To fulfil our legal obligations, Qliro in some cases stores your personal data for five (5) years. Thereafter, the personal data is deleted.</p> |
| When you visit our website Qliro.com or the Qliro app, we process your personal data to manage, analyse, and prevent risks regarding information security/cybersecurity. | Device Information | N/A | <p>We have a legitimate interest in processing your personal data to manage and analyse risks.</p> <p>After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. We also consider the processing necessary to achieve the purpose.</p> | We process your personal data for one (1) year. |
| Use of Tracking Technologies for Marketing (e.g. Meta Pixel) When you visit our website, and if you give your consent, we may use tracking technologies — such as pixels or similar tools — to collect information about your interaction with our site. One | Device information , such as IP address, browser type, device model, operating system, and language settings. Usage data , including which pages you visit, how long you stay, and what actions you take on the site. HTTP headers , such as your IP address, browser | N/A | <p>We rely on your consent to place these tracking technologies and to process any personal data they collect. Without your consent, these tools will not be activated. You can withdraw your consent at any time by updating your cookie preferences on www.qliro.com.</p> <p>This information may be shared with third-party</p> | We process your personal data for one (1) year. |



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| <p>example of such a tool is the Meta Pixel (formerly Facebook Pixel).</p> <p>The purpose of using these technologies is to:</p> <p>Understand how visitors use our website</p> <p>Measure the effectiveness of our marketing campaigns</p> <p>Show you relevant ads on other platforms, based on your interaction with our site (retargeting)</p> | <p>and device details, referring page, page location, and information about the person using the site.</p> <p>Pixel-specific data, including a unique Pixel ID and any associated cookies (e.g. the Facebook/Meta cookie).</p> <p>Button click data, including which buttons you click, the labels of those buttons, and any pages visited as a result.</p> | | <p>providers, such as Meta Platforms Ireland Limited, to deliver personalised advertising based on your interaction with our website, in accordance with their own privacy policies.</p> | |
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3.6. OTHER PURPOSES

We may use your personal data to communicate relevant information and marketing about the products and services you use or similar products and services that we offer, as well as to conduct market and customer satisfaction surveys and analyses via email, mail, phone calls, or SMS. If you want to object to such processing, you have the right to do so; read more in section 4.7 below.

| Purpose of Processing | Category of Personal Data <i>(obtained from you)</i> | Category of Personal Data <i>(obtained from third parties)</i> | Legal Basis for Processing | Storage Period |
|--|---|--|--|--|
| To develop our business operations | Identification Data Contact Data Generated information | | <p>We have a legitimate interest in processing your personal data to develop our business operations.</p> <p>After careful consideration, we believe that Qliro has a legitimate interest that outweighs your interest in not having your personal data processed. We also consider the processing necessary to achieve the purpose.</p> | We process your personal data for one (1) year. |
| To improve our services – We record calls and store written communication with customer service to train our staff, improve our voice response system and develop better ways of working | Identification Data Contact Data Financial Information Generated Information Device information (only when you contact us via our chat function) | N/A | <p>We process your personal data based on our legitimate interest in improving our customer service. This helps us support you in the best possible way in future interactions. We have carefully assessed this and believe that our interest outweighs any potential impact on your privacy. The</p> | We store telephone recordings for two (2) years and written communication, such as emails and chat messages, for one (1) year. |



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| | | | processing is also necessary to achieve this purpose. | |
| To manage events and meetings – including invitations, registrations, and communication regarding participation in meetings, webinars or other events we organise, before, during and after events you attend. | Contact Data , such as name, email address Dietary information | N/A | We process your personal data based on our legitimate interest in providing the event or meeting. | We store the personal data for as long as necessary to manage the event or meeting. |
| To document and promote our events by capturing video, photos, and/or audio recordings. This may include recordings of participants, speakers, or attendees for internal use or external communication (e.g. marketing or event summaries). | Visual data , video recordings and photographs in which you may appear, either individually or as part of a group. Audio data , voice recordings, including speeches, interviews, or incidental background conversations. Event participation details , such as your name, role, company, or title if provided during the event or associated with public speaking or participation. Contextual information , such as location, date, and setting of the event. | N/A | Consent, when required – for example, if individuals are clearly identifiable in promotional material. Legitimate interest, where the processing is necessary to document and promote our events, and where the impact on individuals' privacy is limited. We have assessed that this interest is not overridden by your rights and freedoms. | Recordings and photos used for external communication (e.g. marketing, event promotion, or publication) are retained for up to five (5) years, or until they are no longer relevant or actively used, whichever comes first, or as specifically stated when you provided your consent. |
| To send you newsletters, marketing communications or events. | Contact data , such as your name, email address, and company name and job title (if you represent a company). Interactions , such as information about your previous interactions with us (such as events attended) | N/A | We process your personal data based on your consent if required by law. In other cases, the processing is based on our legitimate interest in informing you about our services, offers, or events that may be relevant to you. | We retain your personal data for marketing purposes for as long as you are a customer or represent a customer, and for up to one (1) year after that. If you withdraw your consent or object to receiving marketing, we will stop processing your data for this purpose sooner. |



4. PROFILING AND AUTOMATED DECISION-MAKING

4.1 QLIRO'S USE OF PROFILING AND AUTOMATED DECISION-MAKING

Qliro uses automated decision making when you apply for a credit by choosing one of Qliro's pay later options as payment method to pay for a purchase from a merchant using the Qliro Checkout. You have the right to express your opinion and contest the decision as well as request that a human reviews and reconsiders the decision.

When you apply for credit, Qliro processes your personal data for profiling, which is a procedure that may involve a series of statistical conclusions to assess certain personal characteristics. The categories of personal data used for profiling are identification data, contact data, financial information, and generated information. By processing your personal data, your creditworthiness or so-called "profile" is determined. Automated decisions to approve or deny your credit application are made based on your profile. If you do not meet the basic criteria according to the respective credit product terms, a decision to deny the requested credit will be made automatically.

Automated decisions to deny a credit application can also be made based on your profile for fraud prevention. In addition to the personal data processed in connection with the credit application, Qliro also processes your device information and information about goods/services for profiling for this purpose.

The purpose of automated decision-making is to enable us to manage credits in an efficient and lawful manner. The automated decision-making process is monitored by Qliro's data protection officer.

4.2 YOUR RIGHT TO OBJECT

As a data subject, you also have the right not to be subject to a decision based solely on automated processing, which produces legal effects concerning you or similarly significantly affects you. You have the right to object to such processing, including profiling. However, this right does not apply if the decision-making is necessary to enter into or perform a contract with you, such as a credit assessment, or if you have given explicit consent. However, you have the right to express your opinion, contest the decision, and request a review by a human. Please contact us as dpo@qliro.com if you would like to use your right to object.

5. YOUR RIGHTS REGARDING QLIRO'S PROCESSING OF YOUR PERSONAL DATA

As a data subject, you have several rights concerning your personal data according to the GDPR. These rights are detailed below. If you wish to exercise your rights, you can contact us using the contact details provided in section 1 of this privacy policy.

5.1 RIGHT TO INFORMATION

You have the right to receive information about how Qliro processes your personal data. This information is primarily provided through this privacy policy when your personal data is collected and is always available on qliro.com and in the Qliro app. You also have the right to receive specific information in the event of a personal data breach that affects your personal data and is likely to lead to a high risk for your rights and freedoms, such as the risk of fraud or identity theft. We will communicate such information directly to you via email or another appropriate medium.

5.2 RIGHT OF ACCESS

You have the right to request confirmation of whether Qliro processes your personal data. If we process personal data about you, you have the right to access a copy of the personal data that Qliro processes about you. There may be legal provisions that prevent us from disclosing certain information to you, such as the Act on Measures against Money Laundering and Terrorist Financing (2017:630). Under certain conditions, Qliro may also deny your request for access if, for example, you request access multiple times within a short period. When requesting access or a copy, we need to take certain measures to verify your identity as the data subject.

5.3 RIGHT TO RECTIFICATION

You have the right to have incorrect personal data rectified or supplemented with personal data that is missing. The right to rectification applies to both personal data collected from you, or a third party and your potential profile created by Qliro through profiling. You can notify us if you wish for us to correct or supplement your personal data.

5.4 RIGHT TO ERASURE ("RIGHT TO BE FORGOTTEN")

You have the right to request the erasure of your personal data. You also have, in some cases, the right to have your personal data deleted or forgotten. This applies if:



- the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- you withdraw your consent on which the processing is based, and there is no other legal ground for the processing;
- you object to processing based on Qliro's legitimate interest, and there are no overriding legitimate grounds for the processing that outweigh your interests;
- the processing is for direct marketing purposes, and you oppose the processing of your data;
- the personal data has been processed unlawfully; or
- it is necessary to comply with a legal obligation.

Please note that Qliro has the right to partially or fully deny your request for the deletion of your personal data to the extent necessary for Qliro to continue processing your personal data to, for example, comply with a legal obligation or to establish, exercise, or defend legal claims. If you use any of our products or services, have a debt with us, or otherwise have an ongoing relationship with us, you generally cannot have such data deleted. Additionally, there are legal requirements that prevent us from deleting certain information even after the cessation of services or other relationships with us. These obligations stem from banking-, anti-money laundering, accounting, and tax legislation, as well as consumer protection laws.

However, we ensure that such personal data is not processed beyond what is necessary to fulfil these obligations, and we limit the processing and access to personal data as much as we can. You can notify us if you wish for us to delete your personal data. Upon such a request, we need to take certain measures to verify your identity as the data subject.

5.5 RIGHT TO RESTRICTION OF PROCESSING

You have the right to request the restriction of the processing of your personal data. A restriction can be made if:

- you believe the personal data we process about you is incorrect and you have requested rectification, you can request restricted processing during the time we are verifying the accuracy of the personal data;
- the processing is unlawful, and you oppose the deletion of the data and instead request the restriction of their use;
- Qliro no longer needs the personal data for the purposes of processing, but you need the data to establish, exercise, or defend a legal claim; or
- you have objected to processing based on legitimate interest; you may request that we restrict the processing during the time we are evaluating whether our legitimate interests outweigh your legitimate interests.

If the processing has been restricted according to any of the above situations, we may, in addition to storage, only process the data to establish, exercise, or defend legal claims, to protect someone else's rights, or based on your consent.

5.6 RIGHT TO DATA PORTABILITY

You have the right to request the transfer of the personal data you have provided to us through your consent or based on a contract with us, and the processing is automated (data portability). You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transfer these personal data to another data controller. The transfer of your personal data can be done provided the transfer is technically feasible.

5.7 RIGHT TO OBJECT TO CERTAIN PROCESSING

You have the right to object at any time to our processing of your personal data based on legitimate interest as a legal basis. Continued processing of your personal data requires us to demonstrate a compelling legitimate ground for the processing that outweighs your interests in the specific processing. Otherwise, we may only process the data to establish, exercise, or defend legal claims.

You always have the right to object to direct marketing, including profiling, without a balance of interests being made. If you have objected to processing for direct marketing, we may no longer process your data for such purposes.

5.8 RIGHT TO WITHDRAW YOUR CONSENT

If Qliro processes your personal data based on your consent, you have the right to withdraw your consent at any time. Qliro will then cease the processing that relies on the consent. You can withdraw your consent by sending us a message via the contact details provided in section 1.

5.9 THE RIGHT TO LODGE A COMPLAINT

If you believe that we process your personal data in violation of GDPR, you have the right to lodge a complaint to a Data Protection Authority via the contact details provided in section 9. Learn more about how to lodge a complaint at each Data Protection Authorities' website.

You can also address complaints to our Data Protection Officer in writing via email by sending your complaint to the Data Protection Officer via the contact details provided in section 8.

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6. WHO MAY WE SHARE YOUR INFORMATION WITH?

Qliro does not sell your information to third parties. However, it is necessary for us to share your personal data with certain third parties in order to provide you with our services and fulfil our agreement with you. We implement reasonable technical, legal, and organizational measures to ensure that your personal data is handled securely and with an adequate level of protection. The following categories of third parties may receive and process your personal data.

SUPPLIERS AND SUBCONTRACTORS

Suppliers and subcontractors are companies that provide Qliro with the services and functionalities required for us to provide you with our services and products. In most cases, suppliers and/or subcontractors are companies that only have the right to process the personal data they receive from Qliro on behalf of Qliro, so-called data processors. Examples of such suppliers and subcontractors are financing partners, financial infrastructure partners, and email-, print-, and logistics companies. In some cases, however, some of these suppliers and/or subcontractors process your personal data for their own purposes and are thus separately responsible for that part of the personal data processing. To read more about how these companies process your personal data, we refer you to their privacy policies.

Qliro needs to access services and functionalities from other companies that Qliro cannot offer itself. Therefore, we may share your personal data with suppliers or subcontractors to access these services and functionalities in the performance of our contractual obligations to you or to fulfil our legitimate interest and for the other purposes outlined in this privacy policy. We ensure that the processing involved is necessary to achieve this interest and that our interest outweighs your right not to have your data processed for this purpose. You have the right to object to this processing if we base the transfer on legitimate interest, due to circumstances specific to your individual case. More information about your rights can be found in section 5.

MERCHANTS

A merchant is a company or organisation that sells goods or services online or instore, who uses the Qliro Checkout to enable you to pay for the purchases you make with such merchant. When you make a purchase with one of the merchant's using the Qliro Checkout, or when you place products in your shopping cart without completing the purchase, the merchant receives information about your purchase or prospect purchase in order to execute and manage your purchase or handle other relevant customer interactions. Qliro also provides information that the merchant needs for certain legitimate interests, such as dispute management or to follow up on an order that was started but not completed. For such information, the respective merchant's privacy policy applies, and the personal data is handled in accordance with it. You have the right to object to this processing if we base the transfer on legitimate interest due to circumstances in your individual case. More information about your rights can be found in section 5.

CREDIT REPORTING COMPANIES AND CREDIT REGISTERS

Financial information about granted credits and loans, payment defaults, and credit abuse is provided to credit reporting companies and credit registers.

DEBT COLLECTION AGENCIES

We may share your personal data when we assign debt collection agencies to collect unpaid debts or if we sell the debt. Debt collection agencies may also process your personal data as data controllers according to their privacy policy. The legal basis for such disclosure is Qliro's legitimate interest in collecting and selling claims. You have the right to object to this processing due to circumstances in your individual case. More information about your rights can be found in section 4.

PARTIES INVOLVED IN THE PAYMENT FLOW

To administer your purchase of a good or service, we need to provide personal data to the payment service provider for the payment method you have chosen, such as card acquirers for card transactions. To administer your direct debit payments (Bg Autogiro), we need to provide personal data to Bankgirot. To administer and execute withdrawals from your savings account in Qliro, we need to share your personal data with the bank where you have your withdrawal account, in compliance with applicable banking secrecy regulations. The legal basis for such disclosure is the performance of a contract with you.

PARTNERS

Qliro may work with various partners, for example in the Qliro app. If you choose to use a partner's service via the Qliro app, we provide generated information such as the fact that you reached the partner via the Qliro app. For certain services you choose, we share financial information and information about goods/services with the relevant partner. Typically, only pseudonymized personal data is shared with our partners. The legal basis for this is to fulfil the contract with you and Qliro's legitimate interest in product development and partnership follow-up. In some partnerships, we also share your contact information, which will be made clear when you choose to use the partner's service. You have the right to object to this processing if we base the transfer on legitimate interest, due to circumstances specific to your individual case. More information about your rights can be found in section 4.

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We are in some cases obligated to share your personal data with different authorities if required by law or in response to a legal request, for example, Financial Supervisory Authority, Tax Authority, Enforcement Authority, Authority for Privacy Protection and Police Authority. An example of when we are legally obligated to disclose such information is to prevent money laundering and terrorist financing according to the Act on Measures against Money Laundering and Terrorist Financing (2017:630). We may also disclose your personal data to authorities if you have consented to us doing so.

MERGERS AND ACQUISITIONS

In the event of a sale, merger, or other business transfer, we may transfer your personal data to a third party involved in the transaction. The legal basis for such transfer is Qliro's legitimate interest in conducting the business transaction. You have the right to object to this processing due to circumstances in your individual case. More information about your rights can be found in section 4.

7. TRANSFER OF YOUR PERSONAL DATA OUTSIDE THE EU/EEA

When applicable, we may share your personal data with other entities in a country outside the EU/EEA, known as a "third country". In a third country, GDPR does not apply, which may pose an increased privacy risk, including the possibility for authorities in a third country to access your personal data and for your ability to exercise control over the personal data. To protect your personal data and to maintain an adequate level of protection, the transfer is based either on a decision by the EU Commission on an adequate level of protection or through appropriate safeguards such as binding corporate rules approved by the competent supervisory authority or the EU Commission's standard contractual clauses combined with organizational and technical protective measures.

You can read more about which countries are considered to have an adequate level of protection on the EU Commission's website by following this link: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

You can read more about the standard contractual clauses by following this link: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en

We always aim to conduct a risk assessment before a transfer is made to a third country and implement both technical and organizational protective measures to ensure an appropriate level of protection. We always strive to transfer as little personal data as possible to countries outside the EU/EEA and, if possible, in anonymized form. For more information on the protective measures Qliro takes, see section 7 of this privacy policy.

SOCIAL MEDIA

We're active on social media and love engaging with our customers and community. However, we kindly ask that you don't share any personal information with us through social media platforms. For questions or support that require personal details, please contact our customer support team directly. You can find the contact details in section 1 of this privacy policy.

8. HOW DO WE PROTECT YOUR PERSONAL DATA?

Qliro has implemented a range of technical and organizational measures to protect your personal data against loss, misuse, unauthorized access, unauthorized disclosure, alteration, and destruction. Please contact us if you want to learn more about Qliro's organizational and technical security measures.

9. CHANGES TO THIS PRIVACY POLICY

We continuously improve and develop our services, products, the Qliro app, and our websites, and the content of this privacy policy changes over time. We encourage you to read this privacy policy every time you use our services and products. If significant changes have been made to our services, products, or this privacy policy, we may notify you via email or in other ways.

10. CONTACT INFORMATION FOR DATA PROTECTION OFFICER AND AUTHORITY FOR PRIVACY PROTECTION

Qliro has a Data Protection Officer (DPO) and data protection specialists who work daily on data protection issues to ensure that we comply with data protection legislation in all markets where we offer Qliro's products and services. If you have questions about the processing of your personal data, you are welcome to contact our DPO at the contact information below.

DPO

Email: dpo@qliro.com

If you are not satisfied with our handling of your case, you have the right to submit a complaint to a Data Protection Authority.



Data Protection Authority

See contact details following this link where you can choose a country: https://www.edpb.europa.eu/about-edpb/about-edpb/members_en#member-se

This privacy policy was last updated on 2025-06-25.