

## Orka Card Privacy Policy

Orka Card ApS - Amaliegade 6, 1256, Copenhagen, Denmark (CVR-nr 40597166) (hereafter “Orka Card”) is a contractual party for customers in regard to usage of the ORKA Card Mobile App (hereinafter “the App”). Orka Card is the data controller or data processor as the case may be depending on the individual contractual agreements with our business partners with regard to any personal information we gather about you, and we make sure that your information is processed in compliance with the law as well as with the individual contractual agreements.

In this policy the term “customers” refers to a natural person, or a contact person acting as a representative of a legal person, who has entered into an agreement with Orka Card. The term “potential customer” refers to a natural person, or a contact person acting as a representative of a legal person, who outside a client relationship has given a consent to the processing of their personal data for marketing purposes, and therefore has been included in the marketing register.

We take data protection seriously and to inform you of how we process your personal information, we have adopted this privacy policy.

### Contact person in matters concerning the registers

If you as a customer or potential customer wish to exercise your rights regarding the processing of personal data, you can get in contact with us at:

- Physical address: Amaliegade 6, 1256 Copenhagen, Denmark
- E-mail address: [privacy@orkacard.com](mailto:privacy@orkacard.com)

### Processing of Personal Data

The purpose of processing of personal data and the registers are to conduct the business and for the use of the App. Orka Card also processes personal data to comply with its statutory obligations, such as identifying customers, fulfilling the know-your-client obligation and carrying out the appropriateness assessment.

As data controller, we have implemented suitable technical and organisational measures to prevent your data from being accidentally or illegally deleted, publicised, lost, corrupted, leaked, misused, or otherwise treated in non-compliance with applicable law. We ensure that processing only takes place in adherence with the principles of data protection, cf. GDPR art.5.

When we act as a data processor, we process data in accordance with the individual instructions from the data controller and the obligations set out in the individual data processing agreements which again are in adherence with the principles of data protection, cf. GDPR art 5.

When we act as a joint data controller, we determine the purpose of the processing of personal information jointly together with the other joint controller with whom we jointly ensure that the processing only takes place in adherence with the principles of data protection, cf. GDPR art.5.

Please see below the legal basis upon which we process your information, for what purpose and for how long we retain it.

#### Website Visitors

When you visit the ORKA Card website, we will process the following personal information about you:

- IP-address,

- dynamic IP-address
- cookies cf. cookie policy
- any information collected through a contact form on the website (name, e-mail address and telephone number)

We collect personal data about website visitors for the purpose of:

- Personalising ads you see on the website
- Optimising our website to user preferences
- Facilitating contact with users at their request
- Optimising the running of our website

We collect the information on the following legal basis:

- Consent has been given through our consent form and/or cookie banner, cf. GDPR art. 6(1)(a)
- The legitimate interest of the enterprise, i.e., optimal administration of the website, cf. GDPR art. 6(1)(f).

We retain the information no longer than legislation permits and we will delete it once it is no longer necessary for our purposes stated above. The retention period depends on the type of information and the purpose of the processing. Typically, personal data on website visitors will be deleted at an annual revision if there is no interaction with the relevant party.

## Potential Customers

If you are a potential customer with us, it is necessary for us to collect the following information about you:

- Full name, Date of birth, Place of birth, Gender, Personal number, Nationality;
- Telephone number, E-mail address;
- Permanent residential address, Contact delivery address;
- Identification document data (image copy, MRZ full, issuing country, document type, document number, date of expiry, date of issue, authority, height);
- Selfie image, Liveliness video;
- IP address, device OS, locale, device ID;
- PEP/Sanctions results;
- Bank Account number, Transaction history;
- Card transaction history.

We collect this information about potential customers for the purpose of:

- Possible future collaboration or sales
- Administration of your relationship with us and/or our co-operative partners

We collect the information on the following legal basis:

- Consent given through consent form, cf. GDPR art. 6(1)(a)
- For the performance of a contract for a debit card agreement and/or loan agreements with other parties, cf. GDPR art. 6(1)(b)
- To comply with a legal obligation related to financial or other regulation, cf. GDPR art. 6(1)(c)
- The legitimate interest of the enterprise in order to provide good customer service may also necessitate the processing, and we ensure that meeting our legitimate interest will not infringe on your rights, cf. GDPR art. 6(1)(f)

We retain the information no longer than legislation permits, and we will delete it once it is no longer necessary for our purposes stated above. The retention period depends on the type of information and the purpose of the processing. Typically, information regarding existing and potential customers will be deleted after the

end of the contract, or when it is no longer considered relevant. Information on potential customers is deleted 2 years after last contact, or at request.

If we publicise customer testimonials, we will only do so on the basis of consent obtained from you.

### Suppliers and partners

For you to be a supplier or partner to us, it is necessary for us to collect the following information about you:

- Name and contact details of the person(s) representing the supplier and /or partner
- Name of company of supplier and/or partner that you represent

We collect this information on suppliers and partners for the purpose of:

- Processing our purchases
- Administration of your relationship with us

We collect the information on the following legal basis:

- Consent given through consent form, cf. GDPR art. 6(1)(a)
- For the performance of contracts or co-operation agreements, cf. GDPR art. 6(1)(b)
- To comply with a legal obligation related to financial and/ or other regulation cf GDPR art. 6(1)(c)
- The legitimate interest of the enterprise such as reviewing potential suppliers and /or co – operative partners that are deemed to be of interest in relation to the services offering that we provide necessitates the processing, and we ensure that meeting our legitimate interest will not infringe on your rights, cf. GDPR art. 6(1)(f)

We retain the information no longer than legislation permits, and we will delete it once it is no longer necessary for our purposes stated above. The retention period depends on the type of information and the purpose of the processing.

Information about suppliers is deleted when we are no longer required to keep personal data on the legal basis as described above.

## Additional information about data processing

### Recordings of phone calls – Documentation

For the purpose of documenting the contents of our telephone conversations with customers, partners and suppliers we occasionally record the call, when you contact us by phone.

We collect the following information about you:

- Name and purpose of contacting us
- Contractual details that are associated with you

Depending on how the conversation progresses, further information may be collected.

We collect the information on the following legal basis: consent or contractual obligation c.f. GDPR article 6 (1) a) or 6 (1) b) respectively

We retain the information collected over the phone no longer than legislation permits. The information is retained for three months unless concrete reasons necessitate an extended retention period.

When you contact us by phone, you will hear a recorded message tell you that the conversation will be recorded. The message contains information about the purpose of the recording, and where you may find additional information about the processing of personal data.

### Recordings of phone calls – training purposes

When you contact us by phone, we may occasionally record the conversation for the purpose of training our staff.

We collect the following information about you:

- Name and purpose of contacting us
- Contractual details that are associated with you

Depending on how the conversation progresses, further information may be collected.

We will only record the conversation, if you have consented to the recording, cf. GDPR art. 6(1)(a)

Personal data are retained no longer than three months unless concrete reasons necessitate an extended retention period.

When you contact us by phone, you will hear a recorded message tell you that we would like to record the conversation, how you can consent to it, withdraw your consent, how we will use the recordings, and where you can read more about our processing of the personal information collected during the phone call.

### Profiling and automated decision-making

Circumstances may arise, when we or co-operation partners to whom we act as a data controller or for whom we act a data processor will use automated decision-making and/or profiling in the processing of your personal information. This will be done with suitable technical and organizational security measures to protect your rights and your legitimate interests, cf. GDPR art. 22.

The automated decision-making happens for the following purpose:

- general profiling
- decisions based on profiling
- decisions based solely on automated processing, including profiling, which are legally binding or otherwise may significantly affect the data subject in connection with debit card or loan applications in the form of credit scoring and legal requirements in relation to AML & CFT - regulations or other financial regulation

We process the personal information on the following legal basis:

- Express consent has been given via a consent form, cf. GDPR art. 6(1)(a)
- For the performance of a financial services contract cf. GDPR art. 6(1)(b)
- To comply with a legal obligation in AML & CFT regulation or other financial regulation cf. GDPR art. 6(1)(c)]

### Data minimisation

We only process the information necessary for the fulfilment of our stated purposes. Beyond those, we may be required by law to collect and retain certain information about you. We only retain personal information for the necessary retention period or as required by law. The personal information is deleted or anonymised when it is no longer necessary for us to process it.

### We keep data up-to-date

As our services depend on your personal information being correct and updated, we request that you inform us of any relevant changes in your personal information. You can use the contact points noted on the first page of this policy to inform us about the changes. We will then make sure to update your information in our

databases. If it comes to our attention that our information about you is incorrect, we will update it and notify you of this.

## Newsletter

Your consent to receive our newsletter is voluntary, and you can withdraw it at any time by contacting us. Please use the contact information above for further information.

## Transmission of your information

To parties who act as data – processors for Orka Card Aps as a data controller.

- We may use a number of third parties to store and process information on our behalf.
- These only process your information on our behalf and are not permitted to use the information for their own purposes.
- We prioritize data processors from within the EU and from third countries approved by the European Commission with regard to an adequate level of protection of personal data, cf. GDPR art. 45.
- Our data processors comprise:
  - Other companies in the ORKA – group
  - IT solution providers

To parties who act as joint data controllers with Orka Card Aps.

- Joint controllership means that both parties are responsible for the purpose and processing of personal information and these comprise:
  - Financial service providers
  - Other service providers who offer our customers complementary offerings

## Your rights

By contacting us at the contact point at the top, you may:

- achieve access to all the personal information we have on you
- rectify any faulty personal information
- have your personal information erased
- receive a copy of your personal information (data portability) for the purpose of moving it to another data controller
- object to the processing
- have the processing of your personal information restricted

## Other Rights

You are always entitled to withdraw your prior consent for the processing of personal data.

You are entitled to prohibit Orka Card from processing data for direct advertising, distance selling and other direct marketing purposes as well as for market and opinion surveys.

In relation to a specific situation, you are entitled to object to other processing that Orka Card carries out on personal data particularly to the extent the processing is based on the Orka Card's legitimate interest. You must then specify the particular situation based on which you are objecting to processing. Orka Card can refuse to comply with the objection on the grounds provided for in law.

When you contact us, requesting to exercise your abovementioned rights, we will respond within a month. If we cannot honour your request, you will receive an explanation.

In order to exercise your rights, or if you have questions about our processing of your information, you can always contact us. Our contact information is at the top.

If, after having been in touch with us you are still dissatisfied with how we process your information, you have the right to file a complaint with <https://www.datatilsynet.dk/english>.