

# Privacy Policy

(Version 8.2 Date 08.08.2023)

In this Privacy Policy, PRS ONE CAPITAL TRUST Kommanditbolag (hereinafter: “NEOBANK”, “we”, “our”) shall inform you about the collection, use and processing of personal data when using our website <https://neobank.com.se> (hereinafter: “Website”), our web application (hereinafter: “Web App”) and our mobile app (hereinafter: “App”; jointly called: “Services”). We will explicitly point out in case any information of this Privacy Policy refers exclusively to our Website, Web App or App. For information related to the usage of cookies or similar technologies on our Websites or Apps, please refer to the respective website and app cookie policies in the legal documents section of your app or on our websites.

In this context, personal data means all detailed information about personal or factual circumstances of a specific or identifiable natural person, such as name, telephone number or address. We process your personal data either within our business relation if you are a NEOBANK customer or when you are visiting our Website for informative purposes. Furthermore we process personal data coming from publicly accessible sources (e.g. records of debtors, trade registers, registers of associations, media, press, internet) whenever we have a legal ground that allows us to do so.

When using additional NEOBANK products or products of our business partners additional personal data might be collected, processed and stored. Please find details concerning the processing of additional data in the respective product category below.

## I. Controller, processors and separate controllers

The responsible entity for the collection, processing and use of your personal data is:

PRS ONE CAPITAL TRUST  
Kommanditbolag

NEOBANK has appointed a Data Protection Officer, who is accessible via

[dpo@neobank.com.se](mailto:dpo@neobank.com.se)

Some of our data processing activities can be carried out by a third party on behalf of NEOBANK. Where processing of personal data is carried out on behalf of NEOBANK, we conclude a separate contract with the processor in accordance with Art. 28 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter: “GDPR”).

Our list of processors includes pure data processors, meaning technical service providers, which fall under the following categories:

- IT infrastructure and connection providers
- IT security providers
- Software and software maintenance providers, including for the provision of our App
- Back office management service providers



- Cloud infrastructure service providers
- Financial services, payments and transaction processing service providers
- Customer relationship management providers
- KYC providers
- Customer support providers
- Fraud prevention service providers and identification service providers
- Payment cards service providers
- Account switching service providers
- Ad service providers
- Address verification providers
- Information/Documentation automation, management & destruction service providers
- Customer reach/impact assessment providers
- Consultancy companies
- Analytical software/platform providers

You will also come across specific data processors which are expressly indicated to you when you use our Services. We understand that these specific data processors can be of interest to you in case you want to exercise, before them, your rights in accordance with the GDPR. These specific data processors are also mentioned in this Privacy Policy for each product or service.

NEOBANK can transmit your personal data to other entities such as other financial institutions, regulatory and supervisory authorities as well as public and governmental bodies and agencies, including addition to that the ECB (European Central Bank), the EBA (European Banking Authority), the German Federal Bank, the BaFin (German Federal Financial Supervisory Authority) among other entities, who will act as separate data controllers of your personal data, for the purposes of:

- Enforcement of claims and defense within legal disputes, based on the legitimate interest of NEOBANK Bank of exercising its right of defense before courts/competent authorities;
- Complying with legal obligations regarding regulatory, tax and anti-money laundering reporting requirements;
- Fraud prevention, based on the legitimate interest of NEOBANK not to contract or provide services to any potential customer related to fraud;
- Preventing criminal acts, based on the legitimate interest of NEOBANK not to contract or provide services to any potential customer related to any crimes.

NEOBANK can transmit your data to external lawyers, advisors and consultants, who are separate controllers and bound to professional confidentiality, for the purposes described above.

Furthermore, NEOBANK will transmit your personal data to third parties, meaning other data controllers of your personal data, if that is triggered by you in the framework of the provision of our Services to you. Specific separate controllers will be indicated for each processing activity in more detail in the following sections of our Privacy Policy.

## II. Data processing purposes and legal basis

We process your personal data in accordance with the GDPR and any national legislation including but not limited to the German Federal Data Protection Act (hereinafter: “**Data Protection Regulation**”).

In compliance with such Data Protection Regulation, NEOBANK will only process your personal data if at least one of the following legal bases applies, as detailed in section III. below regarding our specific data processing activities:

- **The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Art. 6 (1) b) GDPR)**

Personal data is processed to conduct financial services and banking transactions in order to fulfill our pre-contractual and contractual obligations.

- **The data subject has given consent to the processing of his or her personal data for one or more specific purposes (Art. 6 (1) a) GDPR)**

In case you gave your consent to the processing of your personal data for specific purposes, the processing is permitted on the legal basis of your consent. Your consent is revocable at any time, as described in section X. below.

- **Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data (Art. 6 (1) f) GDPR)**

We process your personal data in order to pursue our legitimate interests or the legitimate interests of a third party, where those legitimate interests override any of your rights and the data processing activities are necessary to satisfy such legitimate interests. In such cases, we have carried out a legitimate interest assessment, where those legitimate interests, impact and guarantees have been analyzed. Those cases are the following:

- Improving our processes and service levels relating to the provision of banking services, based on the legitimate interest of NEOBANK of improving its internal processes and services offered to customers and improving the customer experience.
- Direct marketing for NEOBANK products and partnership offers, based on the legitimate interest of NEOBANK to inform customers about updates to existing products, the launch of new products as well as products which are offered together with partners, including marketing or market and opinion analysis.
- Enforcement of claims and defense within legal disputes, based on the legitimate interest of NEOBANK of exercising its right of defense before courts/competent authorities.
- To ensure IT security, based on the legitimate interest of NEOBANK to ensure the security of the IT infrastructure used to provide its services and products.
- Fraud prevention, based on the legitimate interest of NEOBANK not to contract or provide services to any potential customer related to fraud.
- To prevent criminal acts, based on the legitimate interest of NEOBANK not to contract or provide services to any potential customer related to any crimes.
- Risk management within the NEOBANK Group, based on the legitimate interest of NEOBANK of managing the financial risk that it can take with regard to performing financial services.



- To conduct and produce anonymised statistical research and reports, based on the legitimate interest of NEOBANK to conduct research and analysis regarding the use customers make of the products and features provided by NEOBANK.
- **Processing is necessary for compliance with a legal obligation to which the controller is subject (Art. 6 (1) c) GDPR)**  
NEOBANK is subject to several legal obligations as well as regulatory requirements which require NEOBANK to process personal data, including for purposes of verification of your identity and age, prevention of money laundering and fraud, taking part to judicial proceedings or as part of judicial and police activities, verification of your credit risk rating, control and reporting obligations based on provisions of the supervisory authorities, tax laws and risk assessment of NEOBANK. Such obligations derive from the applicable banking legislation and regulatory requirements, including from the Anti Money Laundering Laws, Laws on Countering of Terrorism Financing, Banking Laws, Tax Laws as well as other binding measures on financial matters.

### III. Data processing within the framework of NEOBANK products

#### 1. Data collection and processing in case of opening and using the NEOBANK account

Personal data related to your identification, contact data, economic data and finance data will be processed by NEOBANK for the purpose of opening an account with NEOBANK (hereinafter: “**Sign-up**”) and using the Services of NEOBANK. The legal basis of the processing of these data is Art. 6 (1) b) GDPR. These data include the following personal data:

- First name and surname
- Date of birth
- Place of birth
- Nationality
- Email address
- Legal address
- Mobile telephone number
- Tax-ID and tax residence
- Occupation
- Gender
- Identification document including type of identification document, issue date, document number and issuing authority
- Data concerning your economic situation and your NEOBANK products and services usage history which are your IBAN, customer ID, card details, transaction details (card payment and banking transfer amounts and recipients) based on products and services contracted with NEOBANK.

Please note that it is not possible to open an account, if you do not provide your personal data as mentioned above.

In order to process transactions, NEOBANK receives personal data and transfers personal data according to the applicable legal and regulatory framework to payers, recipients and other financial institutions. The personal



data received by other entities in this regard concerns your name and surname, including transaction details like the payment reference and registered IBAN.

During the creation of your NEOBANK account we will need access to your geolocation upon your consent in the settings of your smartphone; you will find further information in the privacy policy of the operating system of your smartphone. The lawful basis of this processing is our legitimate interests in confirming that you are located in your country of residence in order for us to comply with our legal obligations related to fraud prevention (Art. 6 (1) f) GDPR). For more information on the legitimate interest as a legal basis for processing data, please see section II. above.

In addition, we might ask you to submit additional documents for verification. The lawful basis of this processing is Art. 6 (1) c) GDPR as the processing is required to comply with legal obligations stemming from Anti Money Laundering and Countering of Terrorism laws.

What personal data we will be processing depends on the document we are requesting and receiving from you. Such documents can be a proof of residence (such as a gas, water or electricity bill less than 3 months old or a registration certificate), a proof of salary (such as an employment contract, salary statement or statement of assets and income; in case you send us one of the two latter ones, we ask you to please black out any data related to your religious beliefs and family status, if provided therein), your visa documentation or proof of study which states the reason why you live in the country indicated by you as country of residence, or a document attesting your source of wealth (contracts, bank statements, information around asset sales, capital gains or inheritance).

Once you send us any of the mentioned documents they will be assessed manually by NEOBANK to verify and confirm that we have all the data about you that we need in order to open your account with us or to allow you to continue using our Services.

In case the information you sent us upon our request is not sufficient, we will reach out to you and ask you for more documentation, which is equally subject to the above mentioned.

## **2. Data processing within the framework of MoneyBeam**

The MoneyBeam service is available to you within the framework of the use of our account. You can send money via MoneyBeam to the contacts from your mobile device who are also NEOBANK customers without knowing their bank details. In order to facilitate MoneyBeam, we have to process data from sender and recipient, as well as certain transaction data, based on the execution of our agreement with you, according to Art. 6 (1) b) GDPR. Transaction data are the same as for a normal bank transfer, with the difference that no IBAN is required, but only an email address or phone number, and that no data is transmitted to third parties. In order to use MoneyBeam, customers have to make themselves “visible” as NEOBANK customers and allow access to their mobile device’s contact list. To enable this, NEOBANK will access the contacts stored on your mobile device. NEOBANK shall only access your stored contacts if you previously consent to this. Please find more information in section III.4. below.

## **3. Visibility as an NEOBANK customer when using certain NEOBANK features**

In the context of using certain NEOBANK features like MoneyBeam, Request from friends, Shared Spaces, Split the Bill or Money QR Code, we ask for your consent, according to Art. 6 (1) a) GDPR, to be visible to other NEOBANK customers as an NEOBANK customer. By granting NEOBANK permission to share your status as an NEOBANK customer, we can display this information to other NEOBANK customers, in the context of their use of certain NEOBANK features, if you are present on their mobile device’s contact list. You are then visible to your contacts if they are also customers of NEOBANK. You can revoke this consent in the App at any time via My Account > Settings > Personal Settings > Personal Information, and manage your visibility as explained [here](#).

#### **4. Data processing related to using NEOBANK features in connection to yourcontacts**

To facilitate your use of NEOBANK features in connection with your contacts, we will access your mobile device's contact list and upload your contacts' information to your NEOBANK account, based on your consent, according to Art. 6 (1) a) GDPR. This will include a regular sync with your mobile device to ensure your contacts' information is up-to-date. You can withdraw or manage your consent at any time directly through your mobile device's operating system. You will be able to see all contacts from your mobile device in your NEOBANK account, including which of them are also NEOBANK customers, provided that they have made themselves "visible" as such. We will store your contacts to make them available to you in your NEOBANK account and combine this data with other contact information you provide when using our services to make it easier for you to search and find your contacts in the context of a transaction and the use of other NEOBANK features. For these purposes, we rely on our legitimate interest, according to Art. 6 (1) f) GDPR, to provide you with improved service functionality and a better customer experience. For more information on legitimate interest as a legal basis for processing data, please see section II. above.

#### **5. Data processing in the framework of Shared Spaces**

In order to facilitate Shared Spaces, we have to process data to identify the members of a Shared Space and transaction data related to the use of this feature, based on the execution of our agreement with you, according to Art. 6 (1) b) GDPR. No data is transmitted to third parties. In order to use Shared Spaces, members have to make themselves "visible" and allow access to their mobile device's contact list. You can find more information on this in section III.3.

#### **6. Data transmission within the framework of NEOBANK You/Metal**

In order to facilitate your insurance cover within the framework of NEOBANK You/Metal, we collaborate with AWPP&C S.A. (branch for the Netherlands, which operates as Allianz Global Assistance Europe and is a member of Allianz Group), as our processor. For this purpose, we will transmit your first name and surname, date of birth, email address, NEOBANK reference number and registered address to AWP P&C S.A, based on the execution of the respective agreement with you according to Art. 6 (1) b) GDPR.

#### **7. Data transmission within the framework of Wise**

In cooperation with Wise Payments Ltd., 6th Floor, The Tea Building, 56 Shoreditch High Street, London E1 6JJ, Great Britain (hereinafter: "**Wise**"), we offer "international transfers" from NEOBANK accounts. For the purposes of this service, we will transmit the data collected concerning your identification document, first name and surname, date of birth, registered address, telephone number and email address, based on your request to execute such international transfer and your corresponding consent, according to Art. 6 (1) a) and b) GDPR to Wise, who will act as a separate controller. Additionally, upon regulatory inquiry by Wise, NEOBANK - under its legal obligations, in accordance with Art. 6 (1) c) GDPR - is obligated to transmit to Wise the copy of your identification document created in the course of the process of opening your account.

#### **8. Data processing in the framework of Cash26**

In order to be able to implement the Cash26 service and enable you to withdraw and deposit cash, we shall transmit your account details and the corresponding transaction data, based on the execution of your request to withdraw or deposit cash according to Art. 6 (1) b) GDPR, to our Cash26 partner so you can withdraw and deposit cash in the stores selected by you when using Cash26. To display to you the location of our Cash26 partners nearby, we process your geolocation if you gave consent to it according to Art. 6 (1) a) GDPR. This geolocation will not be shared with the Cash26 partners and will only be used to provide this service, keeping



the data temporarily only for as long as you are using this service each time you are using it. You can revoke your consent at any time in the settings of your smartphone. You will find further information in the privacy policy of the operating system of your smartphone.

## 9. Data transmission in the framework of Google Pay and Apple Pay

In order for you to be able to use the mobile financial services of Google and Apple, NEOBANK needs to transmit transaction data to our processor Mastercard MPTS, who will share the data with Alphabet Inc. (Google) or Apple Inc., as separate controllers, when you use such services to perform a transaction. Such transfer is based on the execution of the agreement between NEOBANK and you, according to Art. 6 (1) b) GDPR.

Tokens are used to authorize and to perform transactions with one of the mentioned service providers and these tokens permit your personal data to remain confidential. Your transaction data is tokenized at Mastercard MPTS before it is transmitted to one of the mentioned service providers.

## 10. Data transmission in the framework of Open Banking

To comply with a request to access your NEOBANK account for payment initiation services, account information services and confirmation on the availability of funds (hereinafter: **"Open Banking Request"**), your personal data is provided to authorized third party payment service providers. The personal data transmitted will include your IBAN, Bank Account ID and NEOBANK User ID. We provide the personal data you request through a licensed third party described in this section on the basis that it is necessary to comply with our obligation under the applicable legal and regulatory framework to provide an interface for communication with licensed payment service providers of your choice (Art. 6 (1) c) GDPR) and that it is necessary to perform our obligations under the NEOBANK account contract (Art. 6 (1) b) GDPR).

## 11. Data transmission in the framework of the Stripe Top Up Feature

The Stripe Top Up Feature (hereinafter: **"Top Up Feature"**) provides an easy method for new customers to add funds to their accounts instantly. Stripe Payments Europe Ltd. (hereinafter: **"Stripe"**), The One Building, 1 Grand Canal Street Lower, Dublin 2, Ireland is providing the technical setup and integration with the relevant payment processors, as a processor. In order to be able to use the Top Up Feature, NEOBANK transmits information regarding payment details (cardholder name, email address, unique customer identifier, order ID, bank account details, payment card details, card expiration date, CVC code, date, time and amount of transaction, merchant name/ID and location) to Stripe. Stripe will also process your data in order to fulfill its legal obligations, as a separate controller, like monitoring fraudulent payment transactions, know-your-customer obligations and

anti-money-laundering screening. Stripe and NEOBANK only exchange anonymized tokens and NEOBANK never sees or stores the details of the card used for the deposit. The usage of the Top Up Feature is entirely voluntary for eligible customers, as part of your contract with NEOBANK and the respective data processing is based on Art. 6 (1) b) GDPR.

## 12. NEOBANK Crypto Service

In order to be able to make the NEOBANK Crypto Service available to you, so you can use the crypto trading services powered by Bitpanda GmbH, Stella-Klein-Löw-Weg 17, 1020 Vienna, Austria (**"Bitpanda"**) within your NEOBANK app, we process the following data points related to you, based on the execution of the agreement between NEOBANK and you, according to Art. 6 (1) b) GDPR:



- Data collected when you create NEOBANK Crypto service account: your name, email address, mobile phone number, date of birth, place of birth, legal address, your tax residence, gender, citizenship, customer ID;
- Data collected from you within the application flow for NEOBANK Crypto Service: your sources of income to invest into cryptocurrencies, current employment status, yearly net income, rough net worth, expected total investment per year, knowledge and experience with investing; knowledge of the potential risks and obligations of stocks and derivatives.

We will also process this data on behalf of Bitpanda (Art. 28 GDPR), and transmit it to Bitpanda and to Bitpanda Asset Management GmbH so that Bitpanda can set up your NEOBANK Crypto Service. This processing is based on pre-contractual steps taken upon your request in accordance with Art. 6 (1) b) GDPR.

When you use your NEOBANK Crypto Service, we process your personal data related to any investment orders and transactions you wish to perform on your NEOBANK Crypto account and we transmit that data to Bitpanda, so that Bitpanda can execute such orders and transactions as a separate data controller. This processing is based on your agreement with Bitpanda, in accordance with Art. 6 (1) b) GDPR.

### **13. Data processing in the framework of the Insights feature**

The Insights feature is available within the App. The feature sorts your transactions/payments and visualizes your spendings in a variety of categories to offer you valuable insights on your spending behavior. In order to offer the Insights feature to you within the App, we process transaction data (i.e. data relating to the sender and recipient of transactions, such as the name of the retailer, amount of transactions, subject/hashtag of transactions) and data relating to certain actions by the user (i.e. hashtags created by the user for purposes of spending categorization), as part of your contract with NEOBANK and the respective data processing is based on Art.6 (1) b) GDPR.

### **14. Data processing when displaying in-App updates**

If you use the App, so-called in-App updates will be displayed. The purpose of the in-App updates is to inform you about the content of your contract, new functionalities of the App or App updates and releases and to give you tips for an optimized use of the App. We will process your user and transaction data (recent deposits, payments, withdrawals, friend referrals) in order to provide you with the relevant in-App updates. We process your data to the extent necessary to display relevant information about your contract with NEOBANK or the improved use or new functionalities in the App (Art. 6 (1) b) GDPR).

In addition, the in-App updates may help you to find information about our new services and products related to the App. In order to display in-App updates relevant to you, we will process your user and transaction data (recent deposits, withdrawals, payments, friend referrals). We process your data within the scope of our legitimate interests in informing you about new services and products implemented in our App, as far as this is necessary to display our new features, services and products so you can use any of them if you are interested (Art. 6 (1) f) GDPR). For more information on the legitimate interest as a legal basis for processing data, please see section II. above.

### **15. Data processing when using the Customer Chat**

When discussing any contractual matters (such as account related information or your transactions) with us on our Customer Chat or on our Website or within our App, your IP-address and the information you provide us in your chat communication will be collected and processed, to the extent this is necessary for NEOBANK to provide you





the products and services under the contract between you and NEOBANK or any pre-contractual actions required by NEOBANK or as requested by you, based on Art. 6 (1) b) GDPR.

In addition, we process your data within the scope of our legitimate interest in answering your general questions about our services and products and to help you find information about our new services and products related to the App, so you can use any of them if you are interested, Art. 6 (1) f) GDPR. For more information on the legitimate interest as a legal basis for processing data, please see section II. above.

## 16. Data processing in the framework of informational communication

We use informational emails, in-App updates and push notifications to inform you about transactions, withdrawals, and other relevant information related to your usage of our products and services. For some informational emails, in-App updates and push notifications we analyze your user behavior (status of signup to NEOBANK, recent transactions, withdrawals, interaction with services offered such as friend referrals) to send you (additional) information about these processes via emails, in-App updates or push notifications. We will only send you these emails, in-App updates and push notifications based on your user behavior if the processing is necessary for the performance of the contract, based on Art. 6 (1) b) GDPR or within the scope of our legitimate interests of informing you about transactions, withdrawals, and other relevant information related to your usage of our App, as far as necessary to provide such information, based on Art. 6 (1) f) GDPR. For more information on the legitimate interest as a legal basis for processing data, please see section II. above.

## 17. Data transmission in the framework of NEOBANK "Insurance"

In cooperation with simplesurance GmbH, Hallesches Ufer 60, 10963 Berlin (hereinafter: "**Simpleurance**"), we offer "NEOBANK Insurance" for NEOBANK customers as individual add-on options. For the purposes of this service, we will transmit the data collected concerning your personal information and your insurance data, namely your first name and surname, registered address, tax-ID, your email provided to NEOBANK, identification number and other information about the insured goods according to Art. 6 (1) b) GDPR to Simpleurance, who will act as a separate controller. Simpleurance may transmit the data collected to the insurer. Please find further information in the Simpleurance privacy policy [here](#).

## 18. Preparing anonymised statistical datasets

We use your personal data to prepare anonymised statistical datasets about our customers' spending patterns for forecasting purposes, refining product development and understanding consumer behavior and assess our company's performance. The reports are produced by using information about you and other customers, however, the information used is anonymised so that it is no longer personal data. You cannot be linked back as an individual within anonymised statistical data and you will therefore never be identifiable from it. We may share these datasets with third parties. This processing is based on NEOBANK's legal obligations, in accordance with Art. 6 (1) c) GDPR, or based on NEOBANK's legitimate interest, under Art. 6 (1) f) GDPR. For more information on the legitimate interest as a legal basis for processing data, please see section II. above.

The following example gives you an idea how we are using anonymised data sets under our legal obligations: The Deposit Protection Scheme of German Banks (*Entschädigungsfonds deutscher Banken 'EdB'*) requires us to provide anonymised datasets that allows EdB to be updated on indemnifiable deposits for the purposes of the Deposit Guarantee Act (*Einlagensicherungsgesetz*).

## 19. Data transmission in the framework of Mastercard Automatic Billing

### Updater Program

In order to be able to use the Automatic Billing Updater ("ABU"), information concerning your current account is transferred to our processor Mastercard Europe S.A. ("Mastercard S.A."), 198/A Chaussée de Tervuren, 1410 Waterloo, Belgium. ABU provides automatic updates of information concerning your Mastercard to third party services you use and to which you subscribed with your Mastercard. By doing this ABU helps to reduce preventable card-not-present declines by changes of stored payment account information. For this purpose NEOBANK transmits Cardholder information (cardholder PAN and card expiration date) as well as payment information according to Art. 6 1b) GDPR to Mastercard S.A. Mastercard S.A. will process those Personal Data for the purpose of providing ABU, including hosting and maintaining the ABU database and checking authorization requests against the ABU database.

## 20. Data processing in the framework of the Waiting Lists

When you ask us to add you to our waiting list for information on when we're able to provide our banking services to you, the following data will be collected and processed so that we can inform you once we are able to offer you our services:

- Country of Residence
- Email address
- Language selected by you when using our website

The legal basis of the processing of these data is Art. 6 (1) (b) GDPR. Please note that it's not possible to include you in the waiting list if you do not provide us with the referred personal data.

Based on your decision to be added to the waiting list, we will send you emails containing the following information:

- Confirmation that you were successfully added to the waiting list
- Information on products/services you may expect as a future NEOBANK customer in your market, once the launch is getting closer, so you can decide if you are still interested to sign-up
- Notification that NEOBANK is available again soon, for example containing the envisaged launch date and information about how to sign up
- Information containing a link to sign up for a NEOBANK account, once NEOBANK is available again.

## 21. Data processing when participating in In-App surveys

When you share your feedback with us in the App by participating in surveys, on a voluntary basis, we process the information that is technically necessary to provide the survey function and enable us to display it to you (metadata). We process your data, as described, for the purpose of displaying surveys to you and obtaining your feedback, based on our legitimate interests, in accordance with Art. 6 (1) f GDPR.

Depending on the survey, we may also process the content of your responses and, in particular, the information that you choose to share with us. Additionally, we may combine the data collected through the survey with other customer data that we process in the context of our contractual relationship with you, including your customer ID, date of account creation, age group, gender, country and city of residence. In this case, we will inform you accordingly in the respective information note at the beginning of the survey. We process your data, as described, for analysis purposes and to improve our products, processes and service levels, based on our legitimate interests, in accordance with Art. 6 (1) f GDPR.



If you decide to share your feedback with us, we may anonymise the data obtained to create research reports and publications. This is done based on our legitimate interest to conduct and produce statistical research and reports and analysis regarding the use customers make of the products and features provided by NEOBANK, in accordance with Art. 6 (1) f GDPR.

For more information on legitimate interest as a legal basis for processing data, please see section II. above.

## 22. Data processing when using the iDEAL Payment Scheme

iDEAL is a payment method that you can use to make online payments through your NEOBANK App or Web App, for example in an online store or by scanning a QR code. It facilitates a direct transfer from your NEOBANK account to that of a beneficiary (e.g. a merchant). The iDEAL scheme is operated by Currence iDEAL B.V., located at Gustav Mahlerplein 33, 1082 MS Amsterdam, Netherlands ('Currence'), which provides the infrastructure and technical setup for the connection between the online payment environment and your NEOBANK account.

When you initiate an iDEAL payment using your NEOBANK account, we process your name, IBAN and BIC numbers, data related to the iDEAL transaction, which include amount, breakdown, type of transaction (i.e. online, in-store, customer-to-customer or QR), currency, transaction ID (a number used to identify an iDEAL transaction executed by you), reference ID (a number used to identify the transaction authorisation request), status and period of validity (maximum authorisation time for an iDEAL payment request), as well as a unique code to confirm that you have been recognised and authenticated when connecting to your NEOBANK account. Additionally, we process the name and ID of the iDEAL payment beneficiary (e.g. a merchant), their bank ID, IBAN and BIC numbers, as well as the merchant category code (if applicable). We further process data related to the device and browser that you used to make the iDEAL transaction, namely IP address, http referer, language settings, device ID, browser ID and device fingerprint.

We process this data as a data controller to verify your identity and authenticate you as an NEOBANK customer and to enable your iDEAL payment, based on the execution of our agreement with you as per Art. 6 (1) b GDPR. In this context, we collaborate with Currence, which acts as a data processor on our behalf. Currence also processes your data as a separate data controller for their own purposes. You can find more information about the processing of your data by Currence in the [iDeal Privacy & Cookies Statement](#). We further process your data to detect and prevent fraud and criminal acts, including money laundering and terrorism financing, as well as to manage risks and for reporting purposes, based on our legitimate interests under Art. 6 (1) f) GDPR. For more information on legitimate interest as a legal basis for processing data, please see section II. above. In addition, we process your data to comply with our legal obligations stemming from applicable laws and regulatory requirements, including anti-money laundering and tax laws as well as other binding measures related to financial matters, based on Art. 6 (1) c) GDPR.

## IV. Identification by means of a liveness-detection photo and video-ident procedure

NEOBANK is legally obliged to check your identity using a valid identification document within the framework of opening an account and to store specific information from the identification document. For this purpose, we offer you a liveness-detection photo (with the combination of photo and video), via an encrypted transmission path, through our reliance partner Safened-Fourthline.

NEOBANK will transmit personal data to its external service providers, as data processors, for the purpose of verifying your identity as required by law. Regarding the liveness-detection photo performed by Safened-Fourthline, we



refer to the Safened-Fourthline Terms and Conditions, which we provide you for your acceptance within the identification procedure. Safened-Fourthline will, after your authorization to do so directly on your device, access the camera of your end device and a photograph of you will be taken by yourself, as well as a video in which you will be requested to move, and the front and rear sides of your personal identification document or the principal page of your passport.

Your personal data is collected as proof of your eligibility to use our services, in accordance with our legal obligations and based on Art. 6 (1) c) GDPR. In order to verify your identity by means of the photo and videos collected in the identification procedure and the identification document, we collect your consent and thus the processing is based on Art. 6 (1) a) GDPR. Please note that, since we are a digital bank with fully remote communication with our customers, we can only offer a remote check of your identity and thus need your consent to proceed therewith.

Once you have completed this identification procedure your personal data will be retained as long as required by our legal obligations, based on Art. 6 (1) c) GDPR.

## V. Social Plugins

On our Website, as well as in our Support Center, we have share buttons linking to Facebook, YouTube, LinkedIn, Twitter, Instagram and Glassdoor. These are not third-party plugins, and do not actively send or allow third parties to fetch personal data or any other sort of information whatsoever. The share buttons are hyperlinks that only redirect you to the respective website of the third party when clicked.

## VI. Marketing Communication

### 1. Marketing emails

In our marketing emails, we inform you about our offers related to NEOBANK financial products and services, features and partnerships between NEOBANK and third parties (discounts on third party products/services for NEOBANK customers), and we may ask for your feedback or opinion via surveys. If you would like to receive marketing emails, we require an email address from you. We will only send you marketing emails if you expressly consent to this as you open an account, based on the Data Protection Regulation

In order to ensure that we only send you information that is most relevant to you and corresponds with your personal interests, we screen and analyze your user behavior by processing data related to your recent transactions, withdrawals, deposits, payments as well as friend referrals and use this information for marketing emails, based on our legitimate interest under Art. 6 (1) f) GDPR to inform you about offers related to NEOBANK financial products and services, features and partnerships between NEOBANK and third parties (discounts on third party products/services for NEOBANK customers), friend referral initiatives, as well as ask for your feedback or your opinion via surveys. For more information on the legitimate interest as a legal basis for processing data, please see section II. above.

Once you created your account you can also give or revoke your consent to receive marketing emails in the App settings via NEOBANK App > My Account > Settings > App-Settings > Communication-Settings > disable respective toggle. Please see the Support Center Article for further information on Marketing Communication settings. These data will only be used for sending you marketing emails and will not be disclosed to third parties.

### 2. Marketing push notifications



In our marketing push notifications, we inform you about our offers related to NEOBANK financial products and services, features and partnerships between NEOBANK and third parties (discounts on third party products/services for NEOBANK customers), and we may ask for your feedback or your opinion via surveys. Push notifications are messages you receive on your phone without a specific request and regardless of whether the App is open. We will only send you marketing push notifications if you expressly consent to this as you open an account, in terms of the Data Protection Regulation.

In order to ensure that we only send you information that is most relevant to you and corresponds with your personal interests, we screen and analyze your user behavior by processing data related to your recent transactions, withdrawals, deposits, payments as well as friend referrals and use this information for marketing push notifications, based on our legitimate interest under Art. 6 (1) f) GDPR. For more information on the legitimate interest as a legal basis for processing data, please see section II. above. Once you created your account you can also give or revoke your consent to receive marketing push notifications in the App settings via NEOBANK App > My Account > Settings > App-Settings > Communication-Settings > disable respective toggle. Please see the Support Center Article for further information on Marketing Communication settings.

### **3. Marketing in-App updates**

In our marketing in-App updates, we inform you about our offers related to NEOBANK financial products and services, features and partnerships between NEOBANK and third parties (discounts on third party products/services for NEOBANK customers), and we may ask for your feedback or your opinion via surveys. In-App updates are small sections within the App providing you with contextual and personalized information.

In order to ensure that we only send you information that is most relevant to you and corresponds with your personal interests, we screen and analyze your user behavior by processing data related to your recent transactions, withdrawals, deposits, payments as well as friend referrals and use this information for marketing in-App updates, based on our legitimate interest under Art. 6 (1) f) GDPR to inform you about our offers related to NEOBANK financial products and services, features and partnerships between NEOBANK and third parties (discounts on third party products/services for NEOBANK customers), and ask for your feedback or your opinion via surveys. For more information on the legitimate interest as a legal basis for processing data, please see section II. above. Once you created your account you can object to the processing of your personal data to receive marketing in-App updates in the App settings via NEOBANK App > My Account > Settings > App-Settings > Communication-Settings > disable respective toggle. Please see the Support Center Article for further information on Marketing Communication settings.

### **4. Customer Chat**

In our Customer Chat we inform you about offers related to NEOBANK financial products and services, features and partnerships between NEOBANK and third parties (discounts on third party products/services for NEOBANK customers), and we may ask for your feedback or your opinion via surveys.

In order to ensure that we only send you information that is most relevant to you and corresponds with your personal interests, we screen and analyze your user behavior by processing data related to your recent transactions, withdrawals, deposits, payments, as well as friend referrals and use this information for marketing information via our Customer Chat, when you are in contact with a customer service agent or NEOBANK Neon, our chatbot, based on our legitimate interest under Art. 6 (1) f) GDPR to inform you about offers related to NEOBANK financial products and services, features and partnerships between NEOBANK and third parties (discounts on third party products/services for NEOBANK customers), and ask for your feedback or opinion via surveys. For more



information on the legitimate interest as a legal basis for processing data, please see section II. above. Once you created your account you can object to the processing of your personal data to receive marketing messages when using our support chat in the App settings via NEOBANK App > My Account > Settings > App-Settings

> Communication-Settings > disable respective toggle. Please see the Support Center Article for further information on Marketing Communication settings.

## 5. Email newsletter

In our email newsletter, we inform you about our offers related to NEOBANK financial products and services, features and partnerships between NEOBANK and third parties (discounts on third party products/services for NEOBANK customers), and we may ask for your feedback or your opinion via surveys. If you would like to receive the email newsletter, we require an email address from you. We will only send you our newsletter if you expressly consent to this as you open an account, based on the Data Protection Regulation.

Processing your data in order for us to send you our newsletter is based on your prior consent according to Art. 6 (1) a) GDPR. You can revoke your consent to receiving our email newsletter at any time. The revocation can be made via a link in the newsletter. Please see the Support Center Article for further information on Marketing Communication settings.

## VII. Online advertising

Online advertising helps us promote our products and services on the internet. In this context, we process personal data about your use of NEOBANK services to deliver personalised advertisements to you and other internet users online and to measure and optimise their performance. We only process personal data for online advertising purposes if you consent to such processing, in accordance with Art. 6 (1) a) GDPR and Section 25 (1) of the German Telecommunications-Telemedia Data Protection Act (TTDSG) together with Art. 5 (3) of the EU Directive on Privacy and Electronic Communications (Directive 2002/58/EC) and the respective national act of implementation. You can revoke your consent at any time in the NEOBANK App via My Account > App-Settings > Marketing Communications > "Advertising Partners" (disable toggle) or in the NEOBANK Web App under My Account > Personal Details > "Advertising Partners" (disable toggle). The data processing for online advertising purposes is described in more detail further down in each section.

### 1. Custom and lookalike audiences

We process your data to create so-called custom and lookalike audiences. Custom audiences consist of NEOBANK customers and internet users and are created to display personalised content to both groups. This permits us to exclude NEOBANK customers from the delivery of advertisements that we believe are not relevant to them. Lookalike audiences consist of internet users that share certain characteristics with NEOBANK customers, which enables us to define target groups that are more similar to NEOBANK customers than the average internet user and deliver more relevant advertisements to them.

To create custom and lookalike audiences, we use the services of our Advertising Partners below:

- Google Ireland Ltd, Google Building Gordon House, 4 Barrow St, Dublin, Ireland ("Google");
- Meta Platforms Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Meta").

For the purposes described above, we transfer your pseudonymised email address to Google and Meta. They then match this email address against a potential account you might have on their services. For this purpose, and regardless of whether the matching is successful or not, the data is retained by Google for up to 48 hours and by Meta for up to 8 hours, after which it is deleted. Google and Meta do not share these data with third



parties. You can find further information on how these technologies work under [How Google uses Customer Match data](#) and in the terms of [Facebook Custom Audiences](#).

## 2. Conversion tracking

We process your data to capture specific actions that take place inside the NEOBANK App and Web App, specifically the sign-up, acceptance of T&Cs, identification procedure of new customers and completion of a first transaction (so-called "conversions"). This enables us to measure and optimise the performance of our online advertisements and to deliver them to internet users that we infer are more likely to complete these conversions.

For the purposes described above, we use the services of Google and Meta (as identified in the previous section). We transfer conversion data, including date and time, to Google and Meta together with the following personal data, which is transmitted with encryption: email address, first name, last name, phone number, gender, city, zip code and country of residence, IP address, customer ID and predicted customer lifetime value. These data points are associated with other personal data collected on our website (see the section on Personalisation/Targeting Cookies in our Cookie Policies for NEOBANK websites). Google and Meta are able to associate these data with your account on their services, if existent. The data is deleted by Google after a maximum of 18 months and by Meta after a maximum of 2 years.

## VIII. International transfers of personal data

Insofar as NEOBANK transmits data to entities located outside the European Economic Area and in order to ensure an appropriate level of data protection equivalent to that granted under the GDPR upon the international transfers of personal data, NEOBANK has implemented one or more of the following transfer mechanisms, in addition to safeguards in accordance with the international data transfer impact assessment on the respective data transfer, if applicable:

- A decision of the European Commission deciding that the third country ensures an adequate level of protection, pursuant to Art. 45 (1) GDPR - the existing adequacy decisions can be found [here](#);
- Standard data protection clauses for the transfer of personal data to third countries ("SCCs"), as adopted by the European Commission, pursuant to Art. 46 (2) c) GDPR - the most recent version of the SCCs can be found [here](#).

You can obtain a detailed copy of the transfer mechanism and more information in this regard by sending a request to NEOBANK to the addresses indicated in section X. below.

## IX. Data collected in the framework of phone call recordings

When discussing any contractual matters (such as account related information or your transactions) with us on the phone, the call between us will be recorded for security and evidence reasons. Our interest to be able to prove contractual inquiries as well as to prevent and detect fraudulent behavior stipulates our legitimate interest to record calls in accordance with Art. 6 (1) f) GDPR. This does not apply to calls aimed at clarifying general inquiries related to NEOBANK products and services.

The call recordings will be retained as long as required for security and evidentiary purposes. The call recordings will be processed by our Interactive Voice Response (IVR) service provider who is processing personal data on behalf of NEOBANK (Art. 28 GDPR). If we are required to do so, the recordings will be shared with the competent authorities, in accordance with the applicable law.

If you do not wish to be recorded when calling us, please do contact us by email or through our Customer Chat for queries related to account related information or your transactions.

## X. Rights

### 1. Your rights

You have the following rights concerning your personal data:

- **right to revoke your consent** according to Art. 7 (3) GDPR, which is detailed in section X.2. below;
- **right of access** according to Art. 15 GDPR, which means you can request information on whether your personal data is being processed by NEOBANK and information on the particular processing of personal data, at any time, along with a copy of the information processed. In no case this right covers the access to documents or the obtention of copies of such documents;
- **right of rectification** according to Art. 16 GDPR, which means you can request the rectification of your data when they are incomplete or inaccurate;
- **right to erasure** according to Art. 17 GDPR, which means you can request the deletion of your personal data when they are no longer required by NEOBANK for the purposes they were initially collected for, or when you understand they have been illicitly used. NEOBANK can reject your request, if the data is necessary to comply with a legal obligation, for public interest reasons or for legal actions;
- **right to restriction of the processing** according to Art. 18 GDPR, which means you can request the restriction of the processing of your personal data when it is legally permitted and, in particular, (i) while you challenge the accuracy of your data, (ii) when you request the restriction of your data because you believe the processing is unlawful, or (iii) when the data is no longer needed for the purposes for which it was collected but NEOBANK needs them for legal actions;
- **right to object to the processing** according to Art. 21 GDPR, which is detailed in section X.2. below;
- **right to data portability** according Art. 20 GDPR, which means you can request NEOBANK to provide you personal data, in a structured, commonly used and machine-readable format and to transmit your data to another controller where the data processing is based on the consent, or on a contract and the processing is carried out by automated means;
- **Right to lodge a complaint with a supervisory authority** according to Art. 77 GDPR, which means that you can complain before the supervisory authority if you consider that the processing of your personal data by NEOBANK infringes the GDPR.

Without prejudice to section X.2. below, please:

Exercise your **right of access**, **right to erasure** and **right to object to the processing** through our [webform](#);

Please do not address your requests through a third party platform which requires us to get back to you through that same means, since we are not able to clearly identify you as an NEOBANK customer in such cases. Instead, please resort to the aforementioned ways of making use of your rights before NEOBANK.

### 2. Specifically, your right to revoke consent and right of objection

You can find below more details about your right to revoke consent and right of objection:

- **Right to revoke your consent** (in accordance with Art. 7 (3) GDPR)



You have the right to revoke your consent to the processing of your personal data at any time with effect for the future. In the event you revoke your consent, your personal data is not processed any longer, unless further processing can be based on a different legal basis for processing (excluding consent). The processing of your personal data remains justified until the date of your revocation.

- **Right of objection** (in accordance with Art. 21 (1) GDPR)

You have the right to object to the processing of your personal data, which is processed in accordance with Art. 6 (1) e) and Art. 6 (1) f) GDPR, at any time. This does also include profiling according to Art. 4 (4) GDPR. In case you object, your personal data is not processed any longer, except when we have legitimate reasons to continue the processing, which exceed your interests, rights and liberties or when the processing is necessary to enforce, exercise or defend legal claims. The processing of your personal data remains justified until the date of your objection.

You can exercise your right to revoke your consent and your right of objection, as mentioned above, either via the specific means provided in our Web App or App, if applicable. You can exercise your right of objection also through our [webform](#).

- **Right of objection concerning data processing for direct marketing purposes** (in accordance with Art. 21 (2) GDPR)

In some cases, we process your personal data for direct marketing purposes. You have the right to object to the processing of your personal data for direct marketing purposes at any time. This also applies to profiling, in case it is connected to direct marketing purposes. In case you object to the processing of your personal data for direct marketing purposes, your personal data is not processed any longer for this purpose. The processing of your personal data remains justified until the date of your objection.

Via the communication settings of your App, you can easily exercise your objection right by using the opt out toggles provided. You can access the settings as follows: NEOBANK App > My Account > Settings > App-Settings > Communication-Settings > disable respective toggle. Please see the Support Center Article for further information on Marketing Communication settings.

## XI. Deletion and retention periods

We are storing and processing your personal data only as long as it is necessary to perform our obligations under the agreement with you or as long as the law requires us to store it. That means, if the data is not required anymore for statutory or contractual obligations, your data will be deleted. This also occurs in case your onboarding process is not finalized with the opening of an account, and meanwhile there are still pending legal or security obligations for the bank to preserve your data. However, that rule does not apply, if its limited processing is necessary for the following purposes:

- Performing regulatory and tax retention periods, which relate to the applicable laws and complementary regulation, including the following laws: Commercial Code (*Handelsgesetzbuch*), Tax Code (*Abgabenordnung*), Banking Act (*Kreditwesengesetz*), Money-laundering Act (*Geldwäschegesetz*) and Security Trading Act (*Wertpapierhandelsgesetz*). The statutory retention periods and documentation obligations are between two to ten years. The applicable legal basis is Art. 17 (3) b) GDPR together with Art. 6 (1) c) GDPR.



- Keeping evidence in the context of statutory limitation periods. According to German Civil law (*Bürgerlichen Gesetzbuch*) these limitation periods can be up to thirty years, however the regular limitation period is three years. The applicable legal basis for this is Art. 17 (3) e) GDPR together with Art. 6 (1) f) GDPR.

Furthermore, whenever your consent is the legal ground to process your personal data, NEOBANK will store that data for as long as you do not revoke your consent or until your account is closed, whatever happens the latest.