

## **Privacy Policy for Shoppers**

### **1. General**

- 1.1. This Privacy Policy ("the Privacy Policy") describes how Anyday Finance A/S, P.O. Pedersens Vej 2, 8200 Aarhus N, Denmark company reg. no. (CVR) 43 33 51 54 ("Anyday", "us", "our", and "we") collects and processes your personal data. We are data controller according to the existing data protection legislation, including the Danish Data Protection Act (*databeskyttelsesloven*) and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.
- 1.2. The Privacy Policy applies to the personal data you give us or that we collect through our website, [www.anyday.io](http://www.anyday.io), and other websites that refer to this Privacy Policy (together the "Websites").

### **2. Collecting, purpose, and legal basis for the processing**

- 2.1. When you visit the Websites Anyday automatically collects personal data about you and your use of the Websites as well as associated online stores during your visit. This includes browser type, IP-address, network location, and information about your computer/device. The data is gathered through cookies that are placed in your device while browsing the associated online stores. See more in our cookie policy on [www.anyday.io](http://www.anyday.io).
  - 2.1.1. The purpose of the processing is to optimize the user experience and the functionality of the Websites, statistical purposes, and to create targeted marketing. The processing happens so that we can safeguard our interest in improving the Websites and show you relevant offers. Additionally, we use the information to send you marketing based on your behavior online, if you have consented to that.
  - 2.1.2. The legal basis for the processing is our legitimate interest, see section 6(1) of the Danish Data Protection Act, according to article 6(1)(f) of the General Data Protection Regulation, which consists of preparing statistical analyses, optimizing the Websites technically and functionally, as well as customizing our marketing to you; and the consent you give when browsing the associated online stores, see section 6(1) of the Danish Data Protection Act, according to article 6(1)(a) of the General Data Protection Regulation.
- 2.2. When you use Anyday as your payment method or communicate with us via our chat, phone, or email, we collect the personal data that you give us, including your name, phone number, address, social security number, email address, copy of photo ID and health insurance card, payment card information, credit information including aggregated bank transaction data, and, if applicable, information about your inquiry through chat, phone, or email. We collect your name, address, and social security number from the CPR-register. From the online store, in which you use Anydays product as your payment method, we collect information about your purchase, including your order number and order amount. From an external partner, we collect information about your economy for the purpose of credit evaluation.
  - 2.2.1. The purposes of the processing are:
    - 2.2.1.1. conducting a credit evaluation and subsequently to fulfill our agreement with you, including providing the service you have requested;
    - 2.2.1.2. conducting an unambiguous identification of you, including the prevention of fraud and unauthorized use;
    - 2.2.1.3. to prepare statistics and analyses enabling us to improve our product and services;
    - 2.2.1.4. to communicate with you, including to register and respond to your inquiries as well as sending you reminders before your payment card expires;
    - 2.2.1.5. to meet our legal obligations; and

- 2.2.1.6. to determine, enforce, and defend a legal claim.
- 2.2.2. The legal basis for the processing is:
  - 2.2.2.1. Section 6(1) of the Data Protection Act, see article 6(1)(b) of the General Data Protection Regulation; to be able to conclude a credit agreement with you and subsequently meet our obligations in accordance with the agreement.
  - 2.2.2.2. Section 6(1) of the Data Protection Act, see article 6(1)(c) of the General Data Protection Regulation; our obligations pursuant to the Danish Bookkeeping Act (*bogføringsloven*) and the current anti money laundering legislation.
  - 2.2.2.3. Section 6(1) of the Data Protection Act, see article 6(1)(f) of the EU General Data Protection Regulation; our legitimate interest in credit evaluating you before giving you the credit line and in preparing statistical analyses to improve our product and services and to prevent fraud.
  - 2.2.2.4. Section 11(2)(2) of the Danish Data Protection Act, consent to processing your social security number.
- 2.2.3. The submission of personal data is a requirement for us to enter in a payment agreement with you. Should you choose not to submit your personal data we cannot offer you a payment agreement as a consequence of that choice.
- 2.3. When you sign-up for our electronic marketing, we collect and process personal data about you, including your name, email address, and phone number.
  - 2.3.1. The purpose is to send you marketing material.
  - 2.3.2. The legal basis for the processing is your consent, see section 6(1) of the Danish Data Protection Act, according to article 6(1)(a) of the General Data Protection Regulation. A separate consent for electronic marketing is collected upon sign-up.
- 2.4. In connection with electronic marketing we process the data we store about you, including your purchase history, as well as the data we have collected through cookies while you were browsing the associated online stores in order to personalize the marketing we send you.
  - 2.4.1. The purpose is to deliver adapted marketing material to you.
  - 2.4.2. The legal basis of the processing is your consent, see section 6(1) of the Danish Data Protection Act, according to article 6(1)(a) of the General Data Protection Regulation. A separate consent for adapted electronic marketing is collected upon sign-up.
- 3. Recipients of personal data**
  - 3.1. If relevant, we may transfer your personal data to the following categories of third parties:
    - 3.1.1. Service providers, including hosting providers, third parties providing IT-support, or providers of analysis tools and CRM-systems;
    - 3.1.2. Partners, who assist in our business activities;
    - 3.1.3. Financial institutions and public authorities;
    - 3.1.4. Authorized debt collection agencies, in the case you default on your credit agreement with us;
    - 3.1.5. Credit evaluation partners;

- 3.1.6. Public authorities, for instance the Police and SØIK (Danish Public Prosecutor for Special Economic and International Crimes);
- 3.1.7. Advisors, including auditors and lawyers; and
- 3.1.8. Consolidated companies.
- 3.2. Transfer of your personal data will always be in compliance with the existing data protection legislation and with appropriate security measures. The transfer will only happen to the extent necessary to perform the service you request, for example in connection with the establishment of a credit agreement, supportation of you, deliverance of electronic marketing, or similar services that require us to process your personal data.
- 3.3. Personal data can be transferred to affiliated external partners that are not established within the EU or EEA. Anyday can, to a relevant extent, transfer your personal data to Twilio (USA), Microsoft (USA), Heroku (USA), Metabase (USA), Superhuman (USA), Lucky Orange (USA), CM Telecom Asia Co., Ltd. (Thailand), Manao Software Co., Ltd. (Thailand), Airtable (USA), Zapier (USA), Hootsuite (USA), Facebook Inc. (USA), and Slack Technologies Inc. (USA). The necessary guarantees for the transfer of personal data are secured through EU's standard contract provisions for transfer of personal data to data processors outside EU/EEA, if the Commission has established the third country has an adequate security level, or through certification or binding company rules according to the General Data Protection Regulation article 45.
  - 3.3.1. You may have a copy of the necessary guarantees for the transfer of your personal data to a country outside EU/EEA by contacting our Customer Support using the contact information provided under clause 8.

## **4. Your rights**

- 4.1. You are entitled to:
  - 4.1.1. Gain access to the personal data we process about you. In such a situation you are required to identify yourself. Therefore, you can be asked to provide documentation to prove that you are who you give yourself out to be.
  - 4.1.2. Receive a copy, in a structured commonly used and electronically readable format, of the personal data we process about you, as well as transferring this personal data to another data controller.
  - 4.1.3. Have us correct any incorrect personal data about you or (in certain cases) have it deleted before the time stated in clause 5. On your personal page in [My Anyday](#) you can correct some of your personal data yourself.
  - 4.1.4. To object to the processing of our otherwise legal processing of your personal data, for example in relation to direct marketing or automatic processing, including profiling.
  - 4.1.5. To have the processing of your personal data limited in certain cases.
- 4.2. If you have given your consent to our processing of your personal data you may at any time withdraw your consent. Your consent for electronic marketing can be withdrawn in your profile in [My Anyday](#) or by following the instructions in the electronic marketing you receive. Withdrawal of your consent does not affect the legality of the processing that has been done based on your consent prior to the withdrawal.

- 4.3. If you are entitled to limit our processing, we may subsequently only process your personal data (except for in relation to storage), if you have given your consent, to determine, enforce or defend legal claims, or for the protection of a physical or legal person or important public interests.
- 4.4. Exercising the above-mentioned rights can be done by contacting us through the contact information provided under clause 8.
- 4.5. You may at any time lodge a complaint with the Danish Data Protection Agency: Datatilsynet, Borgergade 28, 5., 1300 København K, Denmark about our processing of your personal data. Complaints may i.a. Sent via email at: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk) or by phone: +45 33 19 32 00.

## **5. Storage and anonymization of your personal data.**

- 5.1. Personal data collected about your use of the Websites and the associated online stores according to clause 2.1, will be anonymized when you have not used the Websites for 2 years.
- 5.2. Personal data collected in relation to you signing up for our electronic marketing will be anonymized upon withdrawal of your consent to electronic marketing, unless we have another legal basis to continue processing your personal data.
- 5.3. Personal data collected in connection with your use of Anyday as payment method or by your inquiry to our customer support through chat, email, or phone according to clause 2.2, will be anonymized 3 years after the most recent activity in your account, unless clause 5.3.1-5.3.4 states otherwise, however no earlier than 3 years after your account has been fully repaid.
  - 5.3.1. Data may be stored for longer if we have a legitimate need for further storage, for example if storage is necessary to determine, enforce or defend legal claims or for us to enable us to meet our legal obligations. Accounting records are stored for five years until the end of a financial year, see section 10 of the Danish Accounting Act. Documentation stored in accordance with the Danish Money Laundering Act is stored for five years after the end of the trade relations.
  - 5.3.2. Credit information is deleted when no longer relevant. The result of credit evaluation is stored in accordance with clause 5.3.
  - 5.3.3. Communication via chat or email will be anonymized after 1 year unless it gives cause for further storage such as complaints, inquiries for determining, enforcing or defending legal claims.
  - 5.3.4. If you have signed up but not used your account with Anyday we will delete your data after 6 months.

## **6. Security measures**

- 6.1. We have taken appropriate technical and organizational security measures to prevent your personal data from being accidentally or illegally destroyed, lost, changed, deteriorated, or abused, as well as the prevention of unauthorized access to the data. Our security measures are continuously revised based on the newest technological developments.
- 6.2. Only employees with a need to access your personal data, in order to do their job, have access to it.

## **7. Automatic processing**

- 7.1. When you apply for credit, Anyday conducts automatic processing, including profiling, in connection with our credit evaluation of you.

- 7.2. The automatic process is, among other things, done based on data about your economy, your status in the CPR-register, searches in external credit registers, and your previous purchase and repayment history. This means that you on the basis of CPR-information or searches in internal or external databases may be rejected.
- 7.3. You are entitled to object to a rejection based on an automatic processing, including profiling. Should you wish to exercise this right, you may contact us by using the contact information provided in clause 8. We will then make an individual, manual decision instead.
- 7.4. We use data collected through your use of associated online stores and your purchase history to perform profiling activities, in order to personalize marketing material we send to you. You can find more information about the processing and objections to this in clauses 2.3, 2.4, and 4.

## **8. Contact information**

- 8.1. Should you have any questions or comments to our processing of your personal data, or should you wish to exercise one or more of your rights in accordance with section 4 or clause 7.3, please contact:

Anyday Finance A/S  
P.O. Pedersens Vej 2  
8200 Aarhus N

Phone: +45 81 81 61 81  
Email: [kontakt@anyday.io](mailto:kontakt@anyday.io)  
Website: [www.anyday.io](http://www.anyday.io)

## **9. Changes in the Privacy Policy**

- 9.1. Upon changes in the Privacy Policy you will be informed at your next visit on the Websites. In the event of significant changes, we will inform you via email. The Privacy Policy in force from time to time is available at our website, [www.anyday.io](http://www.anyday.io).