

# Viia Privacy Policy

## EXPLANATION

The explanatory text is only used to provide an overview. Only the actual provisions of the Privacy Policy shall apply.

## PRIVACY POLICY

### 1. In general

Who are behind Viia?

1.1 In this Privacy Policy, "Spiir", "we", "us", and "our" refers to Spiir A/S, with registered address at Mejlgade 48b, 2. th., DK-8000 Aarhus C, Denmark. When using the Viia service, including the services provided by Viia and the Viia website (the "Service"), your personal data is processed in accordance with this policy.

We process your information in accordance with current legislation.

1.2 Data processed in relation to the Service will be processed in accordance with applicable legislation and the at any time valid guidelines issued by the Danish Data Protection Agency.

### 2. Data Controller

Who is data controller regarding your personal data in the Viia Service.

2.1 We are the data controller of personal data used in connection with the following activities and services in relation to the Service:

- Profile
- Third-party services
- Accounts
- Anonymisation and statistics
- Logging
- Support

In section 3 you can read about, which of your personal data we process, for which purposes and what the legal basis for the processing is.

### 3. What processing is performed?

3.1 Profile

How we process your profile information.	3.1.1	Data	When creating a profile with Viia, you must enter your e-mail address.
			We also store information on the consents you have provided to us, e.g. allowing us to collect Account Information from your Accounts, and to transfer to third-party services of your choice.
	3.1.2	Purpose	Your personal data is collected in order to register and identify you as a user and to provide our Services to you. We use your e-mail address to forward single-use passwords to you. We also collect the personal data to be able to contact you if it is necessary to confirm your information, answer your questions, and provide customer service to you, and with your consent we may also send newsletters, messages about new features and other material related to Viia to your e-mail address and/or via push messages.
			We also collect the personal data in order to comply with applicable legislation, comply with governmental requirements, comply with internal policies, and to enforce our Terms of Use. Finally, we collect your personal data in order to pursue available legal remedies and limit liability in case of any disputes.
	3.1.3	Legal basis	Our legal basis for processing said personal data is, that the processing of the data is required for us to provide our Services to you.
How we process information on the third-party services which you associate with your profile.	3.2	Third-party services	
	3.2.1	Data	When using Viia, you add information on third-party services to your profile, to which we forward your Account Information.

	3.2.2	Purpose	<p>The information on which third-party services you have associated with Viia, and the consents you have provided us is your personal data.</p> <p>We collect such data in order to provide our Service to you, including being able to forward your information to such third-party services in accordance with your choice.</p>
	3.2.3	Legal basis	<p>Our legal basis for processing your personal data regarding third-party services is your consent.</p>
How we process information about the Accounts, which you associate with third-party services, and the Account Information we collect.	3.3	Accounts and Account Information	
	3.3.1	Data	<p>When using Viia, you associate your Accounts with third-party services in your profile. The information on your Accounts, and which Accounts you have associated with which third-party service in Viia is your personal data.</p> <p>In order to associate an Account with third-party services, you may need to provide information on your log-in credentials for the online service provided by the Financial Institution in question. Such log-in credentials are stored in tokens. Depending on the Financial Institution the log-in credentials may be your usual log-in credentials, in other situation the credentials may be chosen by the Financial Institution.</p> <p>Account Information, being information on account name, balance and transactions regarding the Accounts you have chosen, is collected and stored by the Service.</p> <p>We may, depending on the Account Information obtained, also perform datawash, i.e. cleanup, enrichment and reformatting</p>

on your Account Information. We may also categorise the transaction information from your Accounts.

### 3.3.2 Purpose

Viia collect such information in order to provide the Service to you, i.e. being able to connect and collect your Account Information from the Accounts of your choosing.

Your Account Information is collected by Viia in order to be able to forward information to the third-party services you choose to have such information forwarded to.

Since Viia is a data-storage and data sharing service, we store Account information for up to two years, in order to be able to provide your Account Information to the third-party services of your choice also back in time, and for you to be able to share the same Account Information with more than one third-party service.

3.3.3 When performing datawash and categorisations, this is due to us being able to provide third-party services with Account Information in a standardised format and to be able to provide information on categories of transactions, for the use of such third-party services.

### 3.3.4 Legal basis

The legal basis for collecting and processing information on your Accounts and your Account Information is your consent.

How we may make anonymous copies of your data.

## 3.4 Anonymisation and statistics

### 3.4.1 Data

We may make an anonymous copy of your Account Information. Such anonymous copy of your Account Information is not referable

			to you and is after anonymisation no longer personal data.
	3.4.2	Purpose	The purpose of making an anonymous copy of your Account Information is for us to be able to make statistics, without infringing your right to privacy.
	3.4.3	Legal basis	The legal basis for making an anonymous copy of your Account Information, is our legitimate interest in doing so.
How we perform logging of the use of the Service.	3.5	Logging	
	3.5.1	Data	<p>Via logs whenever the Service is used by you. The log contains information on which profile is logged into, the IP-address used, the time and date, which action has been performed and device information, i.e. information on operating system, browser information and settings.</p> <p>Further, whenever a third-party service accesses the Service a similar log is created.,</p>
	3.5.2	Purpose	<p>The purpose of logging access to the Service is for us to make technical analysis, improvements and optimization of our Service.</p> <p>Further, logging is performed for us to track and hinder any possible illegal activities and abuse of the Service.</p>
	3.5.3	Legal basis	The legal basis for our logging is our legitimate interest in making improvements and optimisation of our Service, as well as our legitimate interest in preventing and pursuing

How we process your information, when providing support to you and when performing error correction.	3.6	any illegal activities and possible abuse of our Service.
	3.6	Support and error correction
		Based on your inquiry, we provide support in connection with your use of our Service. We always pursue to correct errors in the Service.
	3.6.1	Data
		When providing support, we may have a need for accessing any information in your profile, information on which third-party services you have associated with your profile, which Accounts you have associated with which third-party services, and logs.
		If we have a need for accessing your Account information when providing support, we will ask for your explicit consent for this by e-mail to the e-mail address which is associated with your profile. Without such explicit consent, we may not be able to assist you.
		When performing error correction, select employees of ours are authorised to access any information, in order to perform such assignment.
	3.6.2	Purpose
		The purpose of accessing your information is to provide support and resolve any challenges you may have encountered using the Service, or to correct errors in the Service.
	3.6.3	Legal basis
		The legal basis for accessing your information, is our legal interest in supporting your need for assistance or conduction error correction.

We use cookies, tracking identifiers and widgets.	<b>4.</b>	<b>Cookies etc.</b>
You may read more about this in the Viia cookie policy.	4.1	<p data-bbox="831 342 1356 443">If we access your Account Information, when providing you support, the legal basis is consent.</p> <p data-bbox="831 589 951 611">In general</p> <p data-bbox="831 656 1356 790">When using Viia’s website you are asked to accept our use of cookies. We make use of a few cookies, regardless of your consenting to this in order to provide the Service.</p> <p data-bbox="831 831 1356 898">You can read more about our use of cookies, widgets, and tracking identifiers <a href="#">here</a>.</p>
We do not disclose your data, without your consent, unless this is legally necessary.	<b>5.</b>	<b>Recipients/data disclosure</b>
We of course, transfer your data to the third-party services you ask us to.	5.1	The personal data which we process, will not be disclosed to third parties without your consent, except as described in this Privacy Policy, unless we are legally required to disclose the data, or if disclosure is necessary for us to protect ourselves or to enforce legal claims.
	5.2	When you add third-party services to Viia, we will transfer the agreed Account Information to such third-party service, in accordance with your choosing.
We store your personal data for different periods of time, depending on the data.	<b>6.</b>	<b>Storage Period</b>
	6.1	We generally store your personal data until your Viia profile is deleted.
	6.2	Information on which consents you have given us is stored for as long as the consent is used + 3 years.
	6.3	Account Information, i.e. information on transactions, is deleted no later than 2 years after the date of entry of the transaction in

question. However, if your Viia profile is deleted, all your Account Information is deleted.

- We may store data for longer than usual if we need to for legal reasons.
- 6.4 Information in logs is stored for up to 1 year.
- 6.5 If required to comply with legal requirements or to protect our legal interests, we may store data for longer periods in specific situations.
- Instead of deleting your personal data, we may anonymize data instead.
- 6.6 In some cases, instead of deleting your personal data, Viia may anonymize this, cf. also section 3.4. When such data has been anonymized, it will no longer be attributable to you, and hence no longer be personal data.

## 7. Privacy Rights

- You have several legal rights when we process your personal data
- 7.1 In accordance with the General Data Protection Regulation, you have certain legal rights, due to our processing of your personal data. These rights are:
- You are entitled to insight.
- At any time, you have the right to know what personal data we process about you; the purpose of the processing; from where your personal data was obtained; and the identity of any recipients of your personal information.
- You have the right to have incorrect information corrected.
- At any time, you have the right to rectify incorrect or misleading personal data that we are processing about you. You can correct personal information, such as your name, e-mail address, etc. in your profile on the Viia website.
- In some situations, you are entitled to have your personal data deleted.
- In certain cases, you may require that the personal data we are processing about you about you are deleted.
- You have the right to so-called data portability.
- At any time, you are entitled to receive a copy of the personal data



You may always object to our processing of your personal data.

You always have the right to object to our use of your personal data for direct marketing.

you have provided to us, in a commonly used and machine-readable format.

- You may at any time object to us processing your personal data due to your particular circumstances.
- At any time, you may object to our use of your personal data for direct marketing purposes, e.g. forwarding newsletters.

7.2 If you wish to make use of one or more of legal rights, as mentioned above in section 7.1, or wish for us to assist you with this, please contact our DPO, cf. section 12.

## 8. Transfer of personal data outside the EU

We transfer your personal data to data processors in countries outside the EU. You can see who and on which legal basis this occurs.

8.1 Viia uses certain data processors located outside the EU. Below are the entities and legal bases for the transfer of personal data.

Slack Technologies, Inc.	USA	Privacy Shield
SendGrid, Inc.	USA	Privacy Shield
Help Scout, Inc.	USA	Privacy Shield

8.2 Upon request, we can refer you to where you can obtain a copy of the applicable legal transfer basis.

## 9. Confidentiality

We handle your data confidentially. However, data can be accessed if necessary to resolve technical issues or to provide support to you, in which case we ask for your consent.

9.1 Viia always handles your personal data confidentially. Appointed employees with Viia have the authority to access data where it is necessary to solve operational or technical issues. If you ask for support, Viia employees may, with your consent, access your Account Information. All our employees are subject to strict confidentiality requirements when processing personal data.

	<b>10.</b>	<b>Withdrawal of consent</b>
You can always withdraw all or some of the consents you have provided to us.	10.1	At any time, you can withdraw the consents you have provided to us, by deleting your Viia profile on the Viia website or by contacting Viia. You may also withdraw one or more of your consents for collecting and forwarding your Account Information on the Viia website.
You should be aware, that if you withdraw one or more consents, the Service or third-party services may not work properly.	10.2	If you withdraw one or more of your consent(s) you may no longer be able to use the Viia Services in whole or in part, or one or more of the third-party services, you have associated with your profile may not work correctly or as expected.
	<b>11.</b>	<b>Changes to the policy</b>
We may make changes to this privacy policy at any time. You will be informed of any changes.	11.1	We reserve the right to change this privacy policy at any time without prior notice. You will be informed of such changes to the policy either in the Service or by e-mail, to the e-mail address registered in your profile.
If the changes are substantial, you will be asked to accept the changes.	11.2	If we make substantial changes to our Privacy Policy, you will be asked to accept the revised privacy policy, before continuing using the Service.
	<b>12.</b>	<b>Data Protection Officer</b>
If you have questions about our processing of your personal data, you can always contact our DPO, <a href="mailto:dpo@viia.com">dpo@viia.com</a> .	12.1	We have appointed a data protection officer who advises us regarding the processing of personal data in relation to the Service and who can guide you on how to exercise your rights. If you have any questions about this Privacy Policy or the processing of your personal data you may contact our Data Protection Officer by contacting Spiir A/S, Att.: DPO, Mejlgade 48b, 2. th., DK-8000 Aarhus C, Denmark or <a href="mailto:dpo@spiir.dk">dpo@spiir.dk</a> .

- If you wish to complain about our processing of your personal data, we ask you to contact us. You may also complain with the data protection authorities.
- 13. Complaints**
- 13.1 If you wish to file a complaint regarding the processing of your personal data, we would like to hear from you. Our contact information can be found in section 12.1. You may also file a complaint with the Danish data protection authorities: Datatilsynet, Borgergade 28, 5. 1300 København K, Denmark or [www.datatilsynet.dk](http://www.datatilsynet.dk), or your local data protection authorities.
- 14. Version**
- 14.1 This Privacy Policy was issued in May 2019 and is valid until revised by us.