

**bunq**

**BANK OF THE FREE**

# **Privacy & Cookie Statement**

**Content:**

- Personal data
- Cookies

## Personal data

### NOTICE:

*We are aware of the judgment of the Court of Justice of the European Union from the 16th of July 2020 (link). We are currently investigating the implications of the case for the transfer of personal data to the United States of America. We value your privacy dearly and we will do our utmost to find a suitable solution. When the dust has cleared regarding the judgment and when we have found a suitable solution, we will inform you. In the meantime, if you have any questions, please don't hesitate and contact us at [privacy@bunq.com](mailto:privacy@bunq.com).*

### 1. Introduction

At bunq, we really care about your privacy. This means we will never sell or rent your personal data to third parties without your permission. In this Privacy & Cookie Statement you can read what data we collect and how we use it.

The data controller for the processing of your personal data is bunq B.V., registered at the Dutch Chamber of Commerce with registration number 54992060. Our address is Naritaweg 131-133, 1043 BS Amsterdam, the Netherlands.

To make sure bunq only processes personal data in line with the relevant laws and regulations, bunq has appointed a Data Protection Officer (DPO). If you have any questions about the processing of personal data after reading our Privacy & Cookie Statement, you can contact our DPO via [privacy@bunq.com](mailto:privacy@bunq.com). If you want to cancel your bunq account or have any other questions about your bunq account, please contact our support via the bunq app or [support@bunq.com](mailto:support@bunq.com).

### 2. What data does bunq collect

#### Opening a bunq account

To assess and open bunq accounts, we can collect and process the following personal data:

- Personal information: First- and last name; date, country and place of birth; nationality; gender
- Contact and address details: Residential address; telephone number; email address
- Social security numbers and/or other tax identification numbers;
- Counter IBAN;

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- Device data (such as type of device, operating system, IP-addresses and advertising ID's);
- Cookies and usage data on how you use our products and services;
- Correspondence with bunq and support data (telephone, chat conversations and email);
- Additional documentation related to opening an account;
- Picture of an identification document made in the bunq app;
- Video identification data.

## **Use of the app, websites and other services**

While using our app, websites and other services, we can collect and use the following personal data:

- Access to your contact list
- Location data via GPS;
- Uploaded images/content;
- Device data of added devices and API-keys;
- Added aliases (bunq.me pages, telephone numbers and email addresses);
- Financial and banking data, product subscriptions and transaction history;
- Cookies and usage data on how you use our products and services;
- Marketing data (statistics related to our marketing campaigns and data to measure this);
- Correspondence with bunq and support data (telephone, chat conversations and email);
- Activity on bunq Together.

Authentication methods based on biometrical data, such as fingerprint scans, are not stored, used or shared in a format that allows us to reproduce the biometrical data.

## **3. What is the lawful basis for the processing of my personal data?**

bunq processes your personal data in accordance with the relevant laws and regulations based on several legal grounds.

### **Legal requirements**

We process your personal data to comply with our legal obligations, for example to verify your identity and to be able to share certain data with governmental institutions.

## **Contract performance**

To keep our agreement with you and to provide our services in a well and secure manner, we process your personal data. For example, we need your contact information to keep you informed about relevant developments, and we store correspondence data to improve our customer service.

## **Consent**

Because we value your privacy and we want you to have a choice, we will ask your explicit consent for various features. For example, while using the app you can choose to provide access to your contact list, to upload images/content or to create a public bunq.me link.

## **Legitimate interests**

We can also process certain data when we have a legitimate interest to do so, for example, to prevent and combat misuse, fraud and crimes, to analyse the use of our products and services for the purpose of improving them or for information and system security.

## **4. For what purposes does bunq use my personal data?**

We use your personal data to:

- Comply with our legal obligations;
- Execute agreements with our users, for example for processing payments, production of bunq cards, securing bunq accounts, identification purposes and customer support;
- Learn more about the use of our products and services so we can improve them;
- Carry out and personalise (targeted) marketing activities through different channels and measure their effectiveness, based on your personal circumstances and use of our products and services;
- Conduct analyses for statistical, strategic and scientific purposes;
- Prevent and combat misuse, fraud and crimes;
- Ensure the safety and integrity of the financial sector, bunq and our users;
- Training and coaching purposes;
- Improve our current and future products.

## **5. Does bunq share my personal data with third parties?**



To be able to provide our services, we share certain personal data with third parties. We keep the sharing to a minimum and ensure that these third parties will handle your personal data with the same care as we do. This means, among other things, that we sign Data Processing Agreements and that we use the standard contract clauses adopted by the European Commission for personal data protection.

An overview of the third parties or categories of third parties with whom we share data can be found below. Next to this privacy statement, additional privacy statements or policies from these third parties may apply.

### **Onfido Limited**

To verify your identification document and identity, we use the services of third-party supplier Onfido Limited (Finsbury Avenue 3, EC2M 2PA London, United Kingdom).

### **TransferWise**

If you wish to use the services of TransferWise in the bunq app, we share your personal data with TransferWise (56 Shoreditch High St, E1 6JJ London, United Kingdom). This may include a copy of your identification document for opening the account.

### **TeleSign**

In order to verify your identity, we use the services of third-party supplier TeleSign (13274 Fiji Way Suite 600, Marina del Rey, CA 90292, United States).

### **adjust GmbH**

To analyse the use of our websites, products and services, and to measure the effectiveness of our (personalised) marketing campaigns, we use technology from adjust GmbH (Saarbrücker Strasse, 10405 Berlin, Germany).

### **Segment.io Inc. & Mixpanel Inc.**

For bringing together and analysing the personal usage data from various sources, including your use of our websites, products and services and to carry out and measure the effectiveness of our (personalised) marketing campaigns, we use technology from Segment.io Inc. (100 California Street, CA 94111, San Francisco, USA) and Mixpanel Inc. (405 Howard Street, CA 94105, San Francisco, USA).

### **AskNicely**

In order to receive your feedback and to analyze and improve the usage of our services, we use the technology and services of AskNicely (63 Ponsonby Road, Ponsonby 1011, Auckland, New Zealand). For these purposes, personal data is shared to provide AskNicely's services.

### **Google LLC**

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To offer you smooth translations (on your request) and OCR related features (such as invoice and attachment scanning), we use the Cloud Translation and Cloud Vision API's from Google LLC (600 Amphitheatre Parkway, CA 94043, Mountain View, USA). We also use Google's G Suite services, in order to improve the services we offer to you, by enhancing our information security and efficiency. Content will only be stored by Google temporarily (before being deleted) to provide the services, and Google does not claim any ownership of the content nor do they use it for any other purposes except for providing the requested services.

To verify your address, assure your bunq cards arrive at the correct address and for fraud prevention, we also use the services of Google Places API from Google LLC (600 Amphitheatre Parkway, CA 94043, Mountain View, USA). For these purposes, location and usage data is shared to provide and help improve the services. Further information regarding Google's data privacy policy can be found at <https://policies.google.com/privacy>.

## **Mobile payments**

To offer you Apple Pay and Google Pay services, we use the technology from Apple Inc (One Apple Park Way, Cupertino, CA 95014, USA) and Google LLC (600 Amphitheatre Parkway, CA 94043, Mountain View, USA). When you decide to use these services, please take notice of the separate terms and conditions with regard to data sharing.

## **MaxMind**

To verify your location, assure your bunq cards arrive at the correct address and for fraud prevention, we use the technology of MaxMind (14 Spring Street, MA 02451, Waltham, USA). For these purposes, location, usage data and your e-mail address is shared to provide and help improve the services.

## **Cash Payment Solutions**

To offer you the services of Cash Payment Solutions to be able to deposit and withdraw cash at various locations where available, we use the services of Cash Payment Solutions GmbH (Wallstr. 14a 10179 Berlin, Germany). For these purposes, data is shared such as location data in order to show you their nearest locations.

## **Currence**

For the use of the online identification tool 'iDIN' we use the services of Currence (Gustav Mahlerplein 33-35, 1082MS Amsterdam, The Netherlands). Certain personal information is shared for the purpose of verifying your identity.

## **TapiX**

In order to offer you the bunq features Insights and Subscriptions, we make use of the services of TapiX (Dateio s.r.o., Impact Hub Praha, Drtinova 10, Praha 5 – Smichov, Czech Republic). For these purposes, anonymized payment information is shared, for TapiX to enrich your transactions with details about your payment and to offer you with an overview of all your subscriptions.

## Other parties

- Card suppliers for producing and delivering bunq cards;
- Email, marketing and ad services and social media platforms for managing and executing service emails, direct marketing emails , setting up marketing campaigns and helping us track usage of our website;
- SMS providers for sending SMS messages;
- (Outsourced) customer support services;
- Payment institutions for processing transactions and safeguarding the safety and integrity of the financial sector;
- In order to provide you with 'bunq Deals', we may share certain information with the counterparty that provides the Deal. We will only share strictly necessary information and will only share data when you make use of the Deal;
- Notaries for helping you set up your company.

The third parties listed under 'Other parties' are located mainly in the EU. A data processing agreement has been signed with each of them. If they are located outside the EU, the standard contractual clauses provided by the European Commission have been signed.

## Governmental institutions

To comply with laws and regulations we can share data with the concerned institutions. For example, the Tax Authorities can request financial data and we can share data with the Dutch Central Bank for participating in the Deposit Guarantee Scheme. Next to this, bunq can have a statutory or legal obligation to share personal data with investigating authorities to prevent and combat misuse, fraud and crimes.

To help protect the banking system and to assist you in filing your tax returns, we also share your tax information number and the description of your sub accounts with the Tax Authorities.

## 6. How long does bunq store my data?

We only keep your data for the time necessary to fulfil the purpose of collection. We are legally obliged to retain certain data for a minimum of 5 to 7 years after ending the customer relationship.

We are able to store personal data for longer periods with a valid legal ground, or when the data is sufficiently (for example) pseudonymised or anonymised.

## 7. What are my rights?

Below we have outlined the rights the GDPR grants you and what this means for you in the context of your activities with bunq.

<b>Your right</b>	<b>What it means</b>
You have the right to be informed.	We provide you with the necessary information regarding the collection and usage of your personal data. We do this by means of this Privacy Statement.
You have the right to access the personal data we hold about you.	If you file a data access request, we will provide you with a copy of all the personal data we have collected about you. You also have the right to receive this information in a way that is structured, commonly used and machine-readable.
You may request that we delete your personal data.	We will delete the personal data we have collected about you. We will only delete your data if you are no longer an active user with us. Furthermore, Dutch law requires us to keep certain information for up to 10 years.
You may request that we rectify incorrect or incomplete information about you.	If you spot anything in your personal information that is either incorrect or incomplete, let us know! We will change it as soon as possible.
You may object to the processing of your personal data by us.	We process certain data on the basis of legitimate interest. In this case, you can object to the processing.  We will consider your request and determine whether we have an overriding reason to process the data you're objecting to. If this is the case, we will refuse your request.



You may ask us to restrict the processing of your personal data.

Restriction of processing means that we will temporarily suspend processing of your personal data. You can ask us to do so if:

- you contest the accuracy of the information;
- our processing is unlawful but you don't want us to delete the data;
- our processing is unlawful, but you need us to maintain the information in connection to a legal claim; or
- you have objected to the processing and we're evaluating your request.

## 8. Revoking & limiting consent

### **Direct marketing**

If you do not want your data to be used for direct marketing activities, you can let us know via the bunq app anytime. Our communication via email also contains the possibility to unsubscribe from these messages.

### **GPS and access to your contact list**

While using the bunq app, you can provide permission to your contact list and to process location data. If you no longer want us to use location data, or if you no longer want to provide access to your contact list in the bunq app, you can easily revoke these permissions. You will find the settings for the bunq app at the settings for installed apps on your device. You can revoke provided permissions at any given moment.

### **Uploaded images/content**

Images and content that you use to personalise your bunq account or improve your app experience can be easily changed in the bunq app.

### **Public bunq.me profile**

When you create a public bunq.me profile, your nickname and IBAN are visible for anyone that visits your public bunq.me profile for making payments. You can



deactivate your bunq.me page with the accompanying data at any given time via the bunq app.

### **Phone number and email aliases**

At signup we connect your phone number and email address to your bunq account as aliases. This allows other bunq users to easily transfer money to your bank account(s), as your bunq account (and IBAN) will show up in their contact list. You can easily disconnect aliases from your bank account(s) via the settings of the selected bank account.

### **Cookies**

For more information on how to delete cookies, please see our Cookie Statement.

## **9. Changes to the Privacy & Cookie Statement**

We are always improving and expanding our products and services. This might cause our data processing to change. When we change something, we will adjust our Privacy & Cookie Statement accordingly. You can always find the latest version on our website and in the app.

## **10. Complaints**

When you have a complaint about the data processing by bunq, you can contact our Data Protection Officer via [privacy@bunq.com](mailto:privacy@bunq.com).

In case you disagree with the handling of your complaint, you are able to file a complaint at the Autoriteit Persoonsgegevens.

## Cookies

### 1. What are cookies?

Cookies are small (text)files we send to your device when you use or visit our products, services, ads and websites. The files are stored on your device.

### 2. Why does bunq use cookies?

We use cookies to:

- provide basic functionalities of our products and services;
- improve the usability of our products and services;
- show you personalised ads across the web and analyse their effectiveness;
- learn more about the use of our products and services by conducting analyses for statistical, strategic and scientific purposes; and
- manage customer relationships.

We can combine the data gathered from cookies with other data we have about you, to learn more about your personal customer journey, your use of our products and services and to improve our (personalised) marketing as described in this Privacy & Cookie Statement.

### 3. Google Analytics

For bunq.me, bunq.to and together.bunq.com, we have configured Google Analytics in accordance with the guidelines for privacy friendly use from the Dutch Data Protection Authority ('Handleiding privacyvriendelijk instellen van Google Analytics'). This means we've signed a data processing agreement with Google, anonymize IP-addresses and have disabled data sharing where possible. Additionally, Google allows you to opt-out for their analytics cookies via <https://tools.google.com/dlpage/gaoptout>.

### 4. Hotjar Limited analytics

We use Hotjar (St Julian's Business Centre 3, Elia Zammit Street 1000, Malta, Europe) for gathering analytics and analysing the use of our products and services. We have configured Hotjar for privacy friendly use, meaning we've signed a data processing agreement with Hotjar, anonymize IP-addresses and have disabled data sharing where possible. Hotjar honours 'Do Not Track' browser settings and additionally allows you to opt-out for their cookies via <https://www.hotjar.com/legal/compliance/opt-out>.

### 5. Hubspot

In order to gather analytics to analyse the use of our products and services, we use Hubspot (Hubspot Ireland Limited, Ground Floor, Two Dockland Central, Guild

Street, Dublin, D01R8H7). We have signed a data processing agreement with Hubspot in order to guarantee it to be privacy friendly, and we have disabled data sharing where possible. In addition, check out Hubspot's cookie policy for more information on how their cookies work and how to opt-out for their cookies <https://legal.hubspot.com/cookie-policy>.

## **6. How can I block and delete cookies?**

In addition to the measures as described in this statement, if you can easily block and remove all cookies on your device via the privacy settings of your web browser.

If you want to prevent new cookies from being placed on your device, you can block the use of cookies via the privacy settings of your web browser. You can choose to block all cookies or only cookies from specific websites. Please note that blocking cookies will not automatically remove cookies that are already stored on your device.

Please be aware that by blocking and/or deleting cookies, our websites (and possibly other websites) might not function properly. With every new session, new cookies will be placed unless you have blocked the use of cookies.