

Privacy Policy

Contact details
MONI Nordic Oy
PO Box 56
02401 Kirkkonummi
Finland
Business ID: 2588796-3

MONI Nordic Oy (hereinafter “MONI Nordic” or “us”, “our” and similar expressions) offers financial products and services. When a user of our services (hereinafter “User” or “you” and similar expressions) registers and applies for and uses the services of MONI Nordic, MONI Nordic collects, uses, shares and stores the User’s personal data (“your information”) in the manner described in this policy. Below, we wish to inform you on how your information is stored and used. This policy also constitutes a register description of MONI Nordic’s customer register, as provided in Section 10 of the Finnish Personal Data Act.

The legal relation between User and MONI Nordic is determined by (i) this policy, (ii) applicable terms of use, if any, and (iii) the permissions and consents provided by User to MONI Nordic, if any. Other documents or statements, if any, are not legal by nature and are therefore unbinding.

This policy together with the applicable terms of use apply to your use of:

- a) MONI’s websites;
- b) MONI applications once it has been downloaded as a copy onto your mobile telephone or handheld device; and
- c) any of MONI’s services accessible through the MONI applications or the MONI websites.

Collecting, storing and securing information

In connection with our services, we collect information provided by the User and certain third parties, and information which is collected based on the User’s actions.

We collect the following information on the User when the User uses our services:

- Any information and consents provided to Us by User in connection with registration or otherwise;
- Information we obtain from third parties in order to provide our services, where permitted by applicable laws (such as employers, joint account holders, credit reference agencies and authorities or other similar organisations – who may check the information against any particulars on registries or databases)
- Information we collect in connection with using our services:

1. Information on the use and management of your accounts;
2. Information on the transactions you make (such as the date, amount, currency and name);
3. Information on the type of supplier (e.g. “service station” or “retail store”);
4. Information on payments made to or from your account;

Where you provide personal and financial information relating to others (e.g. dependants, joint account holders) for the purpose of opening or administrating your account, or in connection with any other use of our services, you confirm that you have their consent or are otherwise entitled to provide this information to us and for us to use it in accordance with this policy and the terms of use applicable to you.

The collected information is stored in accordance with this policy and any applicable laws in secure locations and servers within the European Economic Area. Our data security is as follows:

- Information stored in our services is stored in accordance with our information management policies and applicable laws in secure places and locations within the European Economic Area (EEA)
- Our premises are physically protected with mechanical and electrical locks and other break-in prevention methods.
- Our data connections utilise firewalls and protection from malicious programs, as well as other protection mechanisms and software which improve the security of our telecommunications and data connections.
- Only designated persons and a limited amount of our personnel have access to the information
- Our personnel have been trained to observe data security in their work.

We will retain your information for as long as is reasonably permitted for business purposes and to any legal requirements or restrictions on data storage and retention.

We will retain your information for as long as is necessary in order for us to answer any queries about our services arising at a later date. Information from which you cannot be identified or which cannot be connected to you may also be used by Us after the afore-mentioned period of time.

We may also have cause to retain certain information on you after the closure of your account, or if your application is declined or abandoned, on the following grounds: (i) in order to prevent and investigate fraud, other criminal offenses or other fraudulent or illegal use of our services, (ii) to protect MONI Nordic from claims by third parties, (iii) in order to be able to invoke any legal protections in order to defend MONI Nordic, (iv) in order to limit any potential damage to MONI Nordic, or (v) if we deem it is required by binding laws or regulation.

Consent

By registering to and using our services you consent to the collection of your information, and you agree that we may store, process and use your information in accordance with this policy.

We may require that upon agreeing to the terms of use of our services you also explicitly agree and acknowledge that MONI Nordic and its selected partners may send you, based on the

collected information, messages which may include recommendations, hints, advertisements and marketing related to the products and services of MONI Nordic and its partners.

How we use your information

Your information is collected in order for us to provide our services to you and other users of our services.

We use your information to manage your account(s), to provide you an account statement, to provide our partners information for evaluation and analysis (including credit and/or behaviour scoring, market and product analysis and market research), to identify and repair technical problems, to prevent and detect fraud, money laundering, other crime and any other misuse, to array out regulatory checks and meet our obligations to any relevant regulatory authority, to better allocate our resources, and in order to enhance and improve our services provided to you and to other customers.

We use your information to advertise, sell and market our products and services or the products and services of our partners, if the User has consented to this or the applicable laws and regulations allow us to act in this way.

We may also use your information if required by any binding laws or regulations.

We store your information primarily within the European Economic Area. We may also transfer your information outside the European Economic Area, if necessary in order to fulfil a request by you, or to provide a service in accordance with our terms of use, or in order to execute or implement any other agreement between the User and MONI Nordic. We may also utilise services located elsewhere to process the information, due to which parts of the information may be transferred through other countries or it may be stored in other countries (depending on the actions of partners providing such services, and not the actions of MONI Nordic, and mainly only temporarily). In any other case, such transferring of your information is subject to your approval.

How you can review, amend or remove your information

According to the Data Protection Act 1998 User always has the right to review and amend his information stored in MONI Nordic's customer register. In addition, User may request us to remove his information. After receiving such request, we remove the account or prevent entry to the information to the extent this is permitted by applicable laws. Removing the information may limit the service we offer. However, we may still retain some information as allowed or required by law, for example in order to retain or present evidence regarding our actions in any matter. Despite the aforementioned rights of User, anonymous information, which cannot be connected to any specific person may not be reviewed, amended or removed by the User.

If you wish to review, amend or remove your information, you may do so by sending us e-mail to the address support@moni.com.

Anti-terrorism

In case of cross-border transaction inside or outside the European Economic Area (EEA) we may provide your personal data to the Society for Worldwide Inter Bank Financial Telecommunications (SWIFT) and the financial institution of the recipient. SWIFT may store such personal data in the EEA and the USA for a limited period of time. US authorities may have access to your personal data for the purposes of prevention of international terrorism.

Other situations in which your information may be transferred to third parties

We may transfer you information to the following partners (“Partners”) for purposes specified further below:

- Companies and organisations that offer to MONI Nordic, or clients of MONI Nordic using its Credit Intermediation Service, services related to MONI Nordic’s operations, including without limitation credit scoring and inspection of credit data, on the understanding that they will keep the information confidential and subject to similar legal requirements regarding privacy and service;
- Companies and organisations that assist us in or carry out the processing of the transactions you make, including but not limited to payment processing service providers;
- Companies and organisations who provide a value-added service or assist us in offering such service.

The purpose of use of our Partners includes: credit scoring and reviews; provision of value-added services; research and statistical analysis; customer service operations; technical support and maintenance for our services; processing of payment transactions; marketing of the products and services of MONI Nordic or its partners to User, if User has consented to this; monitoring misuse of services, as well as collection, compensation and chargebacks.

We may also transfer your information to third parties, if;

- We need to counter or prevent any malicious or fraudulent actions, or to invoke any available legal remedies or to limit potential damage incurred to us;
- We sell, merge, de-merge or otherwise restructure our business operations and a new party becomes the owner of the information;
- Using the information is necessary in order for us to collect our receivables.

Other than as specified herein, we will keep information about you confidential unless we have a duty to disclose it or law or regulation allows us to do so for legitimate business purposes.

Use of cookies

We use cookies in order to enhance and optimise the services offered to you through our websites and MONI applications. The use of cookies means storing information on the use of the websites or the MONI applications on the User’s device. User may disable the use of cookies, but as a result, some services offered through the websites or the MONI applications may not necessarily function in the intended manner, or in the manner they would if cookies were enabled.

Changes to this policy

This policy constitutes a register description of MONI Nordic's customer register as provided in Section 10 of the Finnish Personal Data Act.

REGISTRAR

MONI Nordic Oy (Business-ID 2588796-3)

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Finland

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CONTACT IN MATTERS REGARDING THE REGISTER

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