Neonomics

PRIVACY POLICY – NEONOMICS AS

1. General

Neonomics is committed to protecting your individual rights and keeping your personal data safe. This privacy policy (the "**Policy**") applies when Neonomics AS, reg. no. 919 041 021, Ruseløkkveien 26, 0251 Oslo, Norway, ("**Neonomics**"), provides financial services for digital service providers that you access via the web or an app. This Policy describes the types of personal data we collect through our products and services ("**Services**"). Depending on the circumstances, Neonomics may act as a data controller or a data processor on behalf of another service provider. This Policy describes how we process personal data, who we share it with, your rights, and how you can contact us about our privacy practices. This Policy does not apply to third party websites, products, or services, even if they link to our Services or sites, and you should consider the privacy practices of such third parties carefully.

Neonomics is a Norwegian payment institution licensed by the Financial Supervisory Authority of Norway to provide payment initiation services ("**PIS**") and account information services ("**AIS**").

Depending on the Service, you may either allow us directly or allow us on behalf of your digital service provider to connect to your bank(s) and access relevant personal data related to your bank account(s) such as transaction data, to enable the Service you have requested.

As stated in the Terms of Use for our Services, by using our Services, you duly authorize Neonomics as a Payment Initiation Service Provider ("**PISP**") and / or as an Account Information Service Provider ("**AISP**") to access your online bank account(s) acting on instructions from you.

Data processed by Neonomics' Services will be processed in accordance with applicable privacy laws and regulations, such as the General Data Protection Regulation (the "**GDPR**").

Neonomics may provide additional products and services to businesses online in addition to the Services described in this Policy. Since the collection and use of personally identifiable information may differ across the Services, Neonomics provides information whenever personal data is collected, detailing how it will be used by stating:

- What information is being collected
- How the information may be used
- What choices you have regarding the collection and use of the information

2. When do we typically process your data?

Neonomics mainly processes your personal data in the following situations:

As legally responsible data controller: When Neonomics provides PIS as a designated PISP for a digital service provider to connect to your bank's system and account(s) to initiate payments directly from your bank account, acting on instructions from you to perform a payment, and when Neonomics provides AIS as a designated AISP for a digital service provider to provide account information from your bank, acting on instructions from you to perform an account insight service.

As a data processor: When Neonomics acts as a technical service provider for other designated PISPs.

3. Legal basis for processing your personal data

Performance of a contract: Neonomics processes your personal data when it is necessary for the performance of an agreement between you and us (see the Terms of Use for our Services). Neonomics collects the payment and/or account information generated from the banks and provides the payment and/or account information services that you have requested. We may also act as a data processor on behalf of another digital service provider, in order to fulfil an agreement you have entered into with this provider, for further details please see item 5 below.

Consent: Neonomics processes your personal data in other cases upon your consent. An example of this is if you wish to send your account data from our services to a credit provider.

Compliance with law: Neonomics may process your personal data when it is necessary to comply with a legal requirement. Examples of processing due to legal obligations are:

- Preventing, detecting, and investigating money laundering, terrorist financing, and fraud,
- Bookkeeping regulations,
- Reporting to tax authorities, police authorities, enforcements authorities, supervisory authorities.

Legitimate interest: Neonomics processes personal data regarding for example so called "silent party data" based on legitimate interest. By "silent party data" we mean information such as recipients of your payments and joint account holders.

4. Purpose of processing of personal data

Neonomics processes personal data for these main purposes:

Customer administration: Neonomics will process your personal data to meet our obligations when executing services for you and according to service agreements with you.

Security: Neonomics has implemented technical and organisational security measures to protect your personal data. We always seek to ensure that your personal data is protected against loss, destruction, corruption, or unauthorised access. As part of this, we also anonymize some of your personal data.

Datacategorization: When performing our account information services, Neonomics may process personal data for the purpose of categorization. Meaning Neonomics processes your transaction data to categorize the payment transactions listed in your bank account. For data categorization, we use Google as our data processor, including Google's artificial intelligence (AI) services. Personal data processed in connection with the data categorization is shared with Google in its capacity as a data processor and is not used to train or further develop the AI model.

Prevention and detection of criminal acts: Neonomics is permitted to process personal data for the purpose of preventing, detecting, investigating, and handling fraud and other criminal acts, such as money laundering.

Analysis and development of new services: In connection with the improvement of existing services or development of new ones, Neonomics may collect information for the purpose of analysing how you, as a customer, use our services. .

5. What data does Neonomics process about you?

When you authorize Neonomics to access your bank or when a digital service provider utilizes our Services on your behalf, we will gain access to your personal data. Depending on how you interact with us and for what purpose, we collect and process different types of personal data about you, but never more than is necessary to perform the specific Service you have requested. For example, if you are making a payment and request Neonomics to fetch information from your bank, we will receive and use account name, account balance, account type, the name of the account owner, but not transaction data.

If your digital service provider uses our AIS to retrieve data from your payment accounts, Neonomics will also fetch transaction data, as this is necessary to perform this service.

For the product Verify, we only access account number and name of the account holder. Verify allows our customer to verify that the account number you have provided, matches with your personal ID.

When you set up a profile with us, we will also store your username and password, together with the account number(s) associated with that profile. A profile will enable a better payment experience and enable you to view payment transactions you have initiated via Neonomics.

If you allow Neonomics to obtain your email address from another service provider, we will store your email address to provide a better payment experience for future payments associated with that service provider.

For you to easier understand what type of personal data we may process about you, depending on what specific Service you have requested, we have categorised the personal data into the following categories:

- Name
- Contact information
- Account information
- IBAN/BBAN
- Account name and type
- Balance
- Currency
- Transactions
- Transaction reference
- Transaction amount
- Transaction booking date
- Transaction value date
- Transaction value
- Transaction currency
- Payment information, including recipients, free text you may have entered with the payment
- Availability of funds

- Device id / technical information and personal identification number necessary for identifying you
- Payment tokens, meaning algorithmically generated numbers replacing your payment details, for the security of your data

6. Securing personal data

Personal data processed by Neonomics are processed and stored in a safe and secure manner. Neonomics has established and documented procedures and measures to ensure satisfactory data security regarding confidentiality, integrity, and accessibility in accordance with applicable laws and regulations.

7. Access to and storage of personal data

Neonomics can only store your personal data for as long as necessary to fulfil our purposes, which we have described in item 4 of this Policy. For example, if you are using our PIS, we will only store the personal data we collect and process in this regard until the transaction has been finalized and potential legal obligations are fulfilled.

We will subsequently delete or anonymize your personal data, unless we are required by law, or have a legitimate interest to keep storing the data. For example, Neonomics is required to store payment tokens for 5 years for the purpose of anti-money laundering and anti-terrorist financing. Further we have a legitimate interest to keep certain data for up till 13 years for the protection of Neonomics' legal interests, for example in the event of legal proceedings. We will regularly check whether we have any personal data which must be deleted. However, as we process your personal data for the purposes described in paragraph 4, the actual period for which the personal data is stored will vary depending on those specific purposes.

When authorizing Neonomics with access to your bank(s), we will by default have this access for 180 days unless a shorter period is specifically agreed. 180 days is the standard term, foreseen by the banks under the second Payment Service Directive (the "**PSD2**"). We will never access your account(s) after having completed the Service requested by you. This access may at any point be revoked by you through your online bank or by contacting Neonomics.

8. Third Parties

Neonomics will only disclose your personal data if:

- We are entitled or obliged to under applicable laws and regulations
- You have instructed us to, by consent or as part of an agreement

Neonomics may use data processors for the performance of the Service you are using. In these cases, we will enter into relevant agreements with the processor(s) ensuring your rights and obligations under the GDPR. The use of data processors is not legally considered as disclosure of data.

Neonomics shares data with third parties in the following situations:

- Your digital service provider: When your digital service provider enables you to pay a payment using Neonomics services.
- Hawk AI: as data processor when Neonomics initate a payment, personal information related to the payment transaction is shared with HawkAi for the purpose of transaction monitoring and anti-money laundering.
- Fastly Inc: as data processor for the purpose of Web Application Firewall.
- Google Cloud: as data processor for the purpose of server hosting services andas data processor for the purpose of data categorization in relation to personal finance. Personal information, such as transaction data, from the bank accounts you have provided access to will then be shared with Google Cloud.

9. Transfer of personal data outside the EU / EEA

Neonomics does not transfer personal data outside the EU / EEA without ensuring all relevant legal and technical safeguards in accordance with applicable laws and regulations.

10. Your rights

You have the right to ask us to provide any personal data we have collected about you, to you. Should you wish to do so, please contact us at https://www.neonomics.io/legal/end-user-support to make a subject access request detailing:

- Your name
- Your email-address
- The details of your bank or digital service provider
- The period of data you would like access to

Subject to applicable law, you have the following rights with regard to the personal data we are the data controller of:

- The right to request that Neonomics rectifies or updates your personal data that is inaccurate, incomplete, or outdated
- The right to request that Neonomics erases your personal data in certain circumstances
- The right to request that Neonomics restricts the use of your personal data in certain circumstances
- The right to request that Neonomics exports to another company, where technically feasible, your personal data that we hold in order to provide Services to you.

Where the processing of your personal data is based on your previously given consent, you have the right to withdraw your consent at any time. In some cases, it is however not possible to undo the processing that you previously consented to. For example, if you have instructed us to send your account information to a credit provider, we cannot undo this act. You may also have the right to object to the processing of your personal data on grounds relating to your particular situation.

Should you wish to report a complaint about Neonomics' data processing which has not been addressed in a satisfactory manner, you may contact the Norwegian Data Protection Authority. You will find the Norwegian Data Protection Authority's contact details on www.datatilsynet.no.

11. Amendments

Neonomics can make amendments to this Privacy Policy to comply with statutory requirements and Neonomics' own procedures for processing personal data.

12. Questions and Contact Information

For all inquiries, please use our web form at: https://www.neonomics.io/legal/end-user-support Our address is: Neonomics AS, Ruseløkkveien 26, 0251 Oslo, Norway. Business registration no. 919 041 021.

13. Versions

This version of the Privacy Policy was last updated July 2026.

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