

Privacy Notice for Flatpay ApS

Last update: September 2026

This privacy notice applies for (i) visitors to the Flatpay-website, (ii) contact persons at customers, suppliers, business partners etc., (iii) event participants, and (iv) callers who call customer service.

Flatpay ApS is the data controller for the processing of your personal data as described in this privacy policy.

The data controller's contact details are:

Flatpay ApS

42718033

Hørkær 16, 3. Sal

2730 Herlev

Email: Info@Flatpay.dk

Tlf: +45 8877 3939

In this privacy notice, we provide you with information on the processing of your personal data, and you will always be able to find the latest updated privacy notice on our website.

If your request concerns an application for a job, any collaboration we may have with you or the like, you will receive another privacy notice that applies for the specific processing of your personal data, please see [<https://www.flatpay.com/da/career>].

Overview of the processing activities

In this overview, we explain which personal data we may collect and process about you as a website visitor, business partner, customer or potential customer. We also explain the purpose, legal basis and the retention rules for our processing.

Data subjects	Personal data	Purpose	Legal basis	Retention period
Visitors to the website	Cookies: IP address, operating system, language setting, browser type, equipment type, MAC number/deviceID (depending on equipment), behavioral data, unique identifiers, etc.	Ensuring the functionality of the website (necessary cookies) Marketing purposes (nonnecessary cookies) In order to log preferences and personalize content (non-necessary cookies) statistical and analytical purposes (non-necessary cookies)	Our legitimate interest in providing a functional website, cf. article 6(1)(f) of the General Data Protection Regulation ("GDPR"), regarding necessary cookies. Personal data processed using non-necessary cookies is based on the website visitor's consent, cf. GDPR article 6(1)(a).	The sessions cookies are not stored but deleted once you close the web browser. The persistent cookies are stored until they expire. You can read more about the expiration date for each cookie in the cookie banner.
Contact persons (including customers, contacts with suppliers and business partners etc.)	Name, employer, title, address, phone numbers, email address, whether customer/supplier/business partner, and for merchants also KYC information, pictures, account information for settlement via Flatpay's partners	Maintaining ongoing relationships with (potential) customers, suppliers or business partners	Our legitimate interests in communicating and maintaining our relationship with the (potential) customers, suppliers or business partners, respectively, cf. GDPR article 6(1)(f). In terms of merchants' account information, our processing is necessary for the performance of a contract, cf. GDPR article 6(1)(b).	The personal data are stored for as long as it is relevant for the relationship with the relevant customer, supplier or business partner and for the establishment, exercise or defense of legal claims, or as required by law.

Event participants	Name, e-mail address, title, company name and photo	Hosting events and branding	Our legal basis for processing your ordinary personal data is our legitimate interest in administrating and hosting events as well as branding Flatpay, cf. GDPR article 6(1)(f). We will always inform in advance if photos will be taken at these events.	Participation lists are deleted immediately after the event has been held. Photos are deleted after a period of 3 years from the time they were published.
Callers who call customer service	Voice recordings (voices) Name, address, phone numbers, spoken language, transcriptions (converted text), associated metadata such as Merchant IDs, sentiments scores, timestamps and record IDs	Voice recordings are used for two purposes: 1. To use AI aimed at categorizing customer errors, product errors, issues and/or developments, and inquiries and service, thereby optimizing our processes and products at Flatpay. 2. To support employee training.	Our legal basis for processing your voice for both purposes is your prior consent, in accordance with GDPR Article 6(1)(a).	The voice recordings are deleted after a period of three (3) months. The transcriptions are deleted after a period of three (3) months.

2. Sources and voluntariness

As a general rule, the personal data are collected directly from you or from your device.

3. Categories of recipients

We will only disclose your personal data when it is necessary to fulfill the purposes described in this privacy policy. We disclose or make available personal data with the following categories of recipients:

- Our data processors based on data processing agreements
- Payment institutions in connection with administration of payments and transactions
- Public authorities in connection with statutory reporting and requirements
- Collaborators who are independent data controllers

When using cookies from third-party providers, we may disclose your personal data to such third-party providers. These third-party cookie providers may use personal data about you collected via cookies for their own purposes. You can read more about such third-party cookie providers and find their respective privacy policies in the cookie banner.

4. Joint data controllership

We may sometimes host events together with other parties. In these cases, we have a joint data controllership with the external party related to the processing of personal data in connection with invitations to the event, administrating the participant list and hosting the event. Thus, we transfer your personal data as described above to the external party, with whom we host the event.

We may enter into partnership contract with other parties. In these cases, we have a joint data controllership with the external party related to the processing of personal data in connection with the mutual performance of a contract. We are responsible for providing you with information in accordance with GDPR Art. 13 and 14, and thus, details about the processing, including what personal data is processed, for what purpose and what legal basis as well as retention period is described above.

If you have questions regarding your rights, or if you wish to make use of your rights, you can contact us via the contact information stated in section 2 of this privacy policy.

5. Transfer of personal data to third countries

When we disclose personal data about you to third party cookie providers, we may also transfer your personal data to third countries in which these third parties operate, such as USA. Our legal basis for the transfers in question is the EU Commission's adequacy decision regarding the USA and the third-party providers' subsequent certifications under the EU-US Data Privacy Framework.

You may obtain further information and request a copy by contacting us using the contact details provided in this policy.

6. Retention period

We store the personal data for as long as necessary for the purposes of processing described in this privacy policy. Please consult the above overview for details on the retention periods relevant for the different categories of personal data. We assess the necessity of storing personal data regularly.

7. Your rights

Subject to the conditions set out in the applicable data protection legislation, you have the following rights:

- The right to request access to the personal data
- The right to rectification of inaccurate personal data and to have incomplete personal data completed
- The right to erasure of the personal data
- The right to restriction of processing of the personal data
- The right to object, on grounds relating to your particular situation, at any time to processing of personal data which is based on Art. 6(1)(f) of the GDPR, or if we process your personal data for direct marketing purposes. If you object, we must no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms or if processing is necessary for the establishment, exercise or defense of legal claims.

Right to withdraw consent

Where the processing of personal data is based on your consent, you also have the right to withdraw your consent at any time by using the contact information provided in this privacy policy. If you withdraw such consent, this will not affect the lawfulness of the processing prior to the withdrawal.

Complaints

Finally, you have the right to lodge a complaint with the competent supervisory authority. Please consult the website of the relevant national supervisory authority for how to submit a complaint.

For Denmark Danish Data Protection Agency (in Danish: <i>Datatilsynet</i>) www.datatilsynet.dk	For Finland Finnish Data Protection Ombudsman (in Finnish: <i>Tietosuoja-valtuutetun toimisto</i>) www.tietosuoja.fi/etusivu	For Germany The Berlin Commissioner for Data Protection and Freedom of Information (<i>Der Berliner Beauftragte für Datenschutz und Informationsfreiheit</i>) www.datenschutz-berlin.de
For Italy Italian Data Protection Authority (in Italian: <i>Garante per la protezione dei dati personali</i>) www.garanteprivacy.it	For France French Data Protection Authority (in French: <i>Commission Nationale de l'Informatique et des Libertés</i>) www.cnil.fr	For UK Information Commissioner's Office https://ico.org.uk/
For the Netherlands Dutch Data Protection Authority (in Dutch: <i>Autoriteit Persoonsgegevens</i>) https://www.autoriteitpersoonsgegevens.nl		

8. Electronic communications and anti-spam policy

Flatpay does not permit its services, domains, systems or accounts to be used to send unsolicited bulk or commercial electronic messages ("spam").

We send marketing or promotional electronic communications only where permitted by applicable law and where a valid legal basis exists, including consent where required. We do not knowingly use purchased, harvested or otherwise unlawfully obtained recipient lists. Our communications must accurately identify Flatpay as the sender and include a clear way to unsubscribe or object to direct marketing where applicable.

We honour unsubscribe and objection requests promptly and maintain suppression records to help ensure that recipients are not contacted again for the same marketing purpose. Opting out of marketing does not prevent Flatpay from sending service or transactional communications that are necessary to provide or support our products, administer a contract, maintain security or comply with legal obligations.

Employees, contractors, agents, suppliers and marketing partners may not use Flatpay domains or messaging systems to send spam. We investigate suspected violations, stop unauthorised activity and take appropriate corrective action, which may include suspending or terminating access or a commercial relationship.

You may report an unwanted or potentially abusive message to Info@Flatpay.dk. Please include a copy of the message and, where possible, its full technical headers. We process the information contained in an abuse report to investigate and prevent misuse of our messaging systems, based on our legitimate interest in maintaining secure and trustworthy communications, cf. GDPR Article 6(1)(f). We retain such information only for as long as necessary for the investigation, prevention of further abuse and the establishment, exercise or defence of legal claims.