



Privacy Notice

Effective from 10 September 2025

At Paywerk, we respect your privacy and are committed to protecting your personal data. This Privacy Notice explains how we collect, use, store and protect your information and outlines your rights as a data subject under applicable data protection laws.

1. Who is responsible for your personal data?

Paywerk AS, with the registry code 16218310 and registered address at Liivalaia 34, 10132 Tallinn, Estonia (“we”, “us”, “our” or “Paywerk”) is a [licensed payment institution](#), who provides different flexible payment methods and payment services. By using “you” in this privacy notice, we mean any data subject using or wishing to use our services or whose personal data we are otherwise processing as a data controller under the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and other applicable data protection legislation, including:

- shoppers using any Paywerk payment method to purchase goods or services from an e-shop;
- representatives of Paywerk’s partners and clients (e.g. distribution partners and financiers);
- users of Paywerk’s website and Shopper Portal;
- other data subjects communicating with Paywerk.

Paywerk is the data controller responsible for processing your personal data in providing our services. Under personal data we mean any information which can be used to identify you (e.g. the combination of your name and address).

In case you purchase goods or services from an e-shop of a merchant as a shopper, please note the merchant will be responsible for processing your personal data for selling you the goods or services. Please read the privacy notice of the merchant, available on the e-shop and/or the merchant’s web site, as this will explain how your personal data is used in the e-shop and for the sale agreement with the merchant.

If you use Paywerk’s Pay Later payment methods, the claim of your purchase amount or a part thereof will be assigned to a financial institution in your county of billing address (“Financier”). Prior to such assignment, the Financier will process your personal data for the purpose of assessing the claim, including evaluating the risks associated with providing the Pay Later payment method, to determine whether the Pay Later payment method can be offered. The Financier will be responsible for the subsequent processing of your personal data for the payment of your purchase amount and Paywerk processes certain personal data on behalf of the Financier, e.g. sending you messages in case of successful or failed payment.

Please read the privacy notice of the Financier of your purchase, available on Financier’s website or find it from the list below:

- Estonia:
 - AS Inbank Finance – <https://paywerk.co/docs/en/link/inbank/>

For more information, you can contact our data protection officer any time at dpo@paywerk.co.

2. What kind of personal data do we collect?

We collect personal data directly from you when you are:

- using or interacting with our website or web applications (e.g. device data, session data, IP address);
- registering an account or applying to use our payment services (identification, signing, inserting relevant data);
- using Paywerk payment methods or payment services (card data, transaction data);
- client support or feedback (any personal data provided by you).

We also collect your personal data from third parties, such as our distribution partners and their merchants (e.g. data about your shopping cart).

3. What is our lawful basis for using your personal data?

- We use your personal data to enter into an agreement with you and provide you with our services during the term of our agreement (including agreements with our clients and partners). This includes client on-boarding, concluding and performing your agreement(s) with us, client relationship management and support. Without the contractually required data we will not be able to provide our services.
- We use your personal data to comply with our legal obligations under data protection, payment services, anti-money laundering and counter-terrorist financing, international sanctions and other applicable legislation. Without the legally required data we will not be able to provide our services.
- We use your personal data for our legitimate business interests. This means we have a legitimate business interest in using your personal data which has been assessed and balanced with your privacy rights for each purpose, which include prevention of financial fraud, security of our website and IT-systems, web analytics and product development.
- We may also use your personal data with your permission, e.g. when you consent to receiving marketing offers from us or our carefully selected partners. Your consent is voluntary and asked separately for each purpose, e.g. by asking you to tick a box. You may always withdraw your consent by following the opt-out instructions included in each marketing message, for shoppers in Shopper Portal, or contacting us, but please note this does not affect the lawfulness of the processing during the validity of the consent.

4. How do we protect your personal data?

We respect your privacy and make sure your personal data is processed securely. We understand the world around us is constantly changing and we are analysing the risks and mitigations to your personal data on an on-going basis.

We apply a number of technical and organisational security measures to protect your data from unauthorised or accidental access, loss or modification. Your data is secured both in transit by using encrypted communication protocols and at rest by using ISO/IEC 27001 certified data centres. Your card data is only processed in a tokenised format by our PCI DSS verified payment processor. We have internal policies in place, and we train our personnel in data protection and information security to make sure following our policies are complied with in our daily operations.

5. How do we use cookies and other tracking technologies?

To improve and customise our services, we use cookies and other tracking technologies (“**cookies**”) in our website. Cookies are small files that are stored locally on your device and help us to recognise you. When you interact with our website, you will be provided relevant information about cookies and options to accept or decline them. You can also manage or delete cookies by changing your web browser settings, but please note in this case some of the functionalities of our website may not work correctly or may not work at all.

We mainly use 3 types of different cookies for the following purposes:

- **essential cookies** are used to provide access to different parts of our website and therefore cannot be disabled. Essential cookies are generally stored on your device in response to your actions on the website, e.g. filling in forms or managing cookie preferences. Essential cookies can be either temporary (session) or persistent cookies. Temporary (session) cookies are used for keeping you authenticated in the checkout flow or a portal, and typically expire after 15 minutes. Persistent cookies are primarily used for device recognition, anti-fraud purposes, remembering your preferences (incl. your cookie preferences) and are stored for up to 2 years.
- **analytical cookies** are used to measure and improve the customer experience on our websites by counting unique visitors, source of the visits and understanding how users interact with our websites. All analytical cookies are persistent cookies and typically stored for up to 2 years.
- **marketing cookies** are used to see what pages and links you visit and thereby customise information about our services and provide more relevant ads to you. We may share information collected via marketing cookies with social media providers. All marketing cookies are persistent cookies and typically stored for up to 2 years.

6. Your rights

If you have any questions or you wish to exercise any of your rights as a data subject, please contact us by e-mail at dpo@paywerk.co.

Please note we always need to identify you to make sure your request is legitimate, and your personal data is safe from fraudulent attempts. We will reply at the latest within 30 calendar days from your request and free of charge, except when your request is unfounded or excessive.

Under GDPR, you have the rights to:

- (1) **obtain information** about how we process your personal data, provided in this privacy notice and by answering your questions;
- (2) **access your data** by receiving an electronic copy thereof;
- (3) have your incomplete or inaccurate **data rectified**;
- (4) **withdraw your consents**, where we use your data based on your consent, e.g. sending marketing offers;
- (5) **delete your data**. Please note in some cases we cannot comply with your request. As a financial services provider, we need to store certain data for a period required by law;
- (6) **restrict the processing of your data** in certain cases, e.g. when we investigate if the data is accurate, or you have objected to using your data;
- (7) **object to us processing your data**, e.g. you can always object to using your data for marketing purposes. You can also object to any processing based on our legitimate interest, but please note if we believe our business reason overrides your rights, we cannot comply with your request;
- (8) **transfer your data to another company**. In certain cases, we can provide your data processed by us in a structured, commonly used and machine readable format;
- (9) in case of automated decisions with legal effect, to **object to the automated decision** by expressing your point of view and obtaining human intervention as further described in section 7;
- (10) **submit a complaint** to the relevant data protection authority or a competent court. In Estonia, the data protection authority is Andmekaitse Inspektsioon (www.aki.ee), for other EU countries the contact details of the respective authorities can be found [here](#).

7. How do we profile and make automated decisions about you?

In some cases, we may make a partially or fully automated decision that has legal effect on you. This means we use technology that takes into account information, including your personal data, necessary to predict contractual risks, prevent fraud and ensure our services are secure. If you are not approved based on the automated decision, you may not have access to our services.

Such decisions include approving or declining the use of any Paywerk's Pay Later payment method based on the personal data provided by you, your previous purchases and payments with Paywerk, data on your shopping basket collected from the merchant.

We apply mechanisms to make sure our profiling and automated decision making are relevant by regularly checking our decisioning algorithms and based on a random selection, a number of the automated decisions.

You always have a right to object to an automated decision by contacting us at dpo@paywerk.co. Based on your objection, our employee will manually review the decision considering any additional information and viewpoints you may have submitted.

8. Who do we share your personal data with?

Where and to what extent we disclose your personal data to our partners, depends on each case. We always enter into a data processing agreement to ensure the recipient uses your personal data securely and only to the extent required for specific purposes. Depending on how you use our services, your personal data may be disclosed to the following categories of recipients:

- merchants to enable you to purchase the goods;
- Financiers to enable you to use Pay Later payment methods;
- payment services partners and payment networks (VISA, Mastercard) to process your card payments;
- our suppliers and sub-contractors such as:
 - IT and data hosting suppliers;
 - identity verification service partners;
 - fraud prevention and sanction screening databases;
 - debt collection service providers in case you have outstanding debts to Paywerk;
 - legal and financial advisers;
- In certain cases, we are obliged by law to disclose your data to regulatory authorities (e.g. the Financial Supervisory Authority, tax or other investigative authorities) only to the extent of the defined legal obligation(s).

9. How long do we keep your data?

We retain your data for the minimal necessary period after which your data is depersonalised. We determine the retention periods of your data based on:

- the purposes of processing outlined in this privacy notice;
- applicable legislation, such as accounting (7 years), taxation (7 years) and payment laws (5 years);
- potential or on-going legal disputes between you and us, in which case we may keep your data longer based on our legitimate interest.

For example, we don't store information on unsuccessful purchase attempts longer than 1 year, but for successful purchases data is stored for 7 years after first of January following the final payment to the claim.

10. Where do we store and process your data?

Your data will be stored and processed in data centres within the European Union ("EU"). Our suppliers may transfer your data outside the EU for limited purposes, but in these cases we always make sure the supplier implements appropriate security measures and safeguards with non-EU data recipients, in particular signing standard protection clauses approved by the European Commission.

11. Updates

We may update this privacy notice from time to time. The latest version of the privacy notice is available at all times on our website.