

CAPPY PRIVACY POLICY

Cappy AB, reg. no. 559267–1357, with address Kungsgatan 20, 411 19 Gothenburg, Sweden ("Cappy") processes personal data when providing Cappy's app, which allows you as an employee to access information regarding hours worked and provides the opportunity to collect part of your earned salary and other compensation before regular payday.

The terms "we", "our", "ours" and "us" below refer to Cappy. The terms "you", "your" and "yours" below refer to you as a user of the Cappy app and whose personal data will be processed by Cappy.

In some situations, Cappy will process your personal data as a personal data controller and in others, Cappy will process your personal data as a data processor on behalf of your employer. You can read more about who is responsible for which processing activities in section 1 below. Cappy always processes personal data in accordance with applicable law, including the EU's General Data Protection Regulation. We want you to feel secure with the data we process, and we therefore ask that you read this privacy policy that describes how we process your personal data and what rights you have according to law. You are always welcome to contact us if you have any questions about our processing of your personal data. You will find our contact information in section 4 below.

1 WHAT PERSONAL DATA DO WE PROCESS, FOR WHICH PURPOSES, ACCORDING TO WHAT LEGAL BASIS AND HOW LONG DO WE STORE IT?

Cappy's processing as a personal data controller

To be able to provide the Cappy app to you, we must process personal data about you as a user. In the table below you will find information about what personal data we process, why we process it, what legal basis we have for the processing and how long we store your personal data for the respective purposes. Cappy is personal data controller for the processing activities included in the table below.

When we do not collect your personal data directly from you, we collect it from your employer.

Why do we process your personal data? (Purpose)	What personal data do we process?	What is the legal basis for the processing?	How long do we store your personal data?
To manage our relationship with you e.g., to administer your user account and manage transactions between you and Cappy	Name, personal identification number, telephone number, e-mail address, address, employer, number of salary withdrawals made per salary period, historical information regarding hours worked and withdrawals of salary and other compensation	To fulfil our agreement with you	As long as you have a Cappy user account

To provide information about hours worked, deviations and absence and earned and expected salary and other available compensations and payments (for example bonuses or expenses)	Number of hours worked per pay period, deviations and absence, earned salary and other available compensations and payments (for example bonuses or expenses), withdrawals made, regular salary	Consent	As long as you have a Cappy user account or until you withdraw your consent
To send marketing to you and manage our communication with you	Name, e-mail address, employer	Legitimate interest – to be able to market and inform you of our current and future products and services	As long as you have a Cappy user account and for one year thereafter
For accounting purposes	Name, personal identification number, telephone number, employer, information about transactions between you and Cappy	To fulfill a legal obligation	For 7 years from the end of the calendar year when the current fiscal year ended
To enable Cappy's creditor (third party) to determine, assert and defend legal claims	Personal identification number, amount, date of withdrawal, date of repayment (regular payday)	Legitimate interest – to enable a third party to defend its interests in potential legal claims against employers if Cappy is unable to do so	As long as you have a Cappy user account
To determine, assert and defend legal claims	All personal data listed above	Legitimate interest – to defend our interests in potential legal claims	In accordance with the longest storage time applicable for the other purposes listed above, unless there is a risk of a potential dispute, in which case the data will be processed until it is no longer needed to ensure Cappy's rights or until the dispute is settled

Cappy's processing as a personal data processor

Through Cappy's app, you can collect your earned salary and other compensation in advance of regular payday. Cappy manages withdrawals of your earned salary and other compensation in advance, and carries out salary payments on the regular payday as well as other payments on behalf of your employer. This means that Cappy acts as a personal data processor in relation to your employer when processing your personal data for these purposes. Your employer is always responsible for paying your salary.

When Cappy acts as a personal data processor on behalf of your employer for the abovementioned purposes, Cappy processes personal data such as personal identification number, telephone number, employer, number of hours worked per pay period, earned salary, withdrawals made, regular salary and bank details. The personal data is processed as long as you have a user account in the app or as long as your employer is connected to the app, unless Cappy receives other instructions from your employer.

If you wish to have more information about the processing that your employer is responsible for as a personal data controller, we kindly ask that you contact your employer.

2 TO WHO DO WE DISCLOSE YOUR PERSONAL DATA AND WHERE DO WE PROCESS IT GEOGRAPHICALLY?

Your personal data may be disclosed to and processed by others. Examples of third parties that we may share your personal data with are external advisors such as auditors or other consultants we use for management of accounting matters and other matters in our operations. These actors are independently responsible for their handling of your personal data.

To provide the Cappy app and service, Cappy shares information about your withdrawals of earned salary or other compensation in advance of regular payday with Cappy's creditors. This information is only disclosed to enable the creditors to assert its claim for the salary amount towards your employer, if Cappy for any reason is unable to do so. The information is only disclosed if you make a withdrawal of your salary or other compensation in advance of regular payday.

We may also disclose your personal data to our collaboration partners and to our service providers who process personal data on our behalf, so-called personal data processors. We have agreements with our personal data processors to ensure that they process your personal data in accordance with this policy and our instructions.

Cappy provides the app through the platform Microsoft Azure. Your personal data is stored within the EU. Microsoft Azure may however transfer and process your personal data both within and outside of the EU/EEA, e.g., in the US. To ensure that your data is protected in the same way as if it had been processed within the EU/EEA, Microsoft Azure enter into agreements with the recipients of personal data based on the [European Commission's standard contractual clauses](#).

3 YOUR RIGHTS

When we process your personal data, you have certain rights according to law. Please note that the exercising of these rights is subject to certain requirements and conditions specified by law (EU's General Data Protection Regulation).

If you do not have any grounds for your request or if your request is unreasonable, e.g. if you frequently and at short intervals request excerpts or deletions, we have the right to refuse your request or charge a fee that covers the administrative costs incurred by your request.

Your right to information and access

You have the right to request, in writing and free of charge, to receive information about what personal data we have registered about you and request that we provide you with a copy of your personal data.

Your right to rectification and erasure

If your personal data is incorrect or incomplete, you have a right to request that we correct or complete the relevant personal data. You can correct some of your personal data yourself directly in the app.

You have the right to request that we delete personal data we have registered about you subject to certain conditions (specified in EU's General Data Protection Regulation). If your request meets the relevant conditions, we will delete your personal data.

Your right to withdraw consent

You have the right to at any time withdraw your consent to our processing of personal data. This will however not affect the legality of the processing that we carried out until you withdrew your consent.

Your right to object

You may, at any time, object to the processing of personal data based on our legitimate interests. We will subsequently no longer process the personal data, unless we are able to prove compelling legitimate grounds for the processing that override your interests, rights and freedoms or if it is for the establishment, exercise or defence of legal claims.

Your right to restriction

Under certain conditions specified in EU's General Data Protection Regulation, you have the right to request that the processing is restricted. If you have this right such personal data will only, except for storage, be processed with your consent, for the establishment, exercise or defence of legal claims, to protect the rights of another natural or legal person or for other reasons involving an important public interest.

Your right to data portability

You may have the right to obtain personal data relating to you that you have provided to us in a structured, generally used and machine-readable format, and you may have the right to transfer this data to another personal data controller when technically possible.

Your right to file a complaint

If you are dissatisfied with how we have processed your personal data, please contact us, see our contact information in section 4. You also have the right to make a complaint about our processing of personal data to the supervisory authority in your country of residence or employment, or in the country where the processing of personal data which you are dissatisfied with has been carried out. In Sweden, the competent supervisory authority is:

The Swedish Authority for Privacy Protection (Sw. Integritetsskyddsmyndigheten)
Box 8114
104 20 Stockholm
imy@imy.se

4 CONTACT CAPPY

You can contact us by:

- e-mail: dataskydd@cappy.se

5 CHANGES

Cappy reserves the right to change and update this privacy policy. In the event of material changes of the privacy policy or if existing personal data is to be processed in another way than specified in the privacy policy, Cappy will inform you of such changes in an appropriate manner.

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