

PRIVACY POLICY

For recipients of an acceptemail



1. Privacy Policy

We are committed to safeguard the privacy of Recipients of an AcceptEmail. In this policy we explain when and how your personal information is processed.

2. Definitions

Acceptemail	A standardized digital payment or mandate request including the payment status that is sent with an e-mail message, a text message or online on a website. This payment or mandate request may be used by clicking the SmartImage.
AcceptEmail BV	Private company with limited liability AcceptEmail BV. Doing business as AcceptEasy
Client	Customer of the Acceptemail Service, also referred to as Supplier, Sender or Customer.
SmartImage	Upper part of the Acceptemail; a dynamically rendered real time banner / image created by Supplier that the Receiver (Debtor) can click on and where the payment status is indicated, the payment amount, the beneficiary (if any), the expiration date, a payment reference and the logo of the Sender.
Recipient	The receiver of an Acceptemail, person or entity that receives and an Acceptemail which is sent via our platform by our Clients (Senders).
Partner	Party with which Acceptemail has an agreement regarding promotion or reselling of the Service.
Sender	The sender or in whose name is being sent of the Acceptemail, being our Client and your Supplier.
Supplier	An entity that supplies goods and/or services to another organization or an individual person in exchange for a payment. Your Supplier is the Sender of an Acceptemail and our Client.
User	Employees of our clients, employees of our Partners and individual registered Recipients.



3. Information collection and use

For every Acceptemail that is sent we process personal information.

- What personal information do we collect?
 - Email address;
 - PaymentReference (could be invoicenumber or clientnumber, any reference the sender (our Client, your Supplier) determines;
 - Any other personal information that your Supplier chooses to have in the email. Most likely this data is to show the relationship between your Supplier and you (for example a name, address or customer number enabling the Recipient to verify that they have a relationship with the Supplier);
 - Payment/mandate date (in case paid via the Acceptemail). Depending on the payment method (CreditCard, PayPal, Sofort, IDEAL, Bank transfer, etc) we receive information such as:
 - Which payment method was used;
 - Payment/transaction details;
 - Mandate information (account number, bank account holder name, mandate ID) in case of direct debit mandate requests.
- When do we collect information?
 - When your Supplier provides us with Recipient personal data in order to send an Acceptemail;
 - When Recipients dowloads and view an Acceptemail SmartImage (in an email client, browser or elsewhere);
 - When Recipients click on the SmartImage in the Acceptemail (or payment link in email, sms, QR code, website or other presentment location);
 - When Recipients initiate, abort or complete a payment;
 - When Recipients subscribe and use a personal account (site where all payment banners that have been sent to a Recipient email address are being stored).
- We may use your personal information to:
 - \circ $\;$ Enable Recipient use of the Acceptemail services;
 - To create the Acceptemail;
 - To enable payment for what Recipients may have agreed on with the Supplier,

or,

- To enable the granting of a mandate for direct debit;
- To allow Recipients to view the Acceptemail banner and its status (to pay, paid, expired, etc.)
- Give feedback to your Supplier on your payment;
- o Give feedback to your Supplier on your permission for a direct debit;
- \circ $\;$ Give feedback to your Supplier on your use of the Acceptemail (views & clicks);



- We may use the data that Recipients enters in the Service, with the exception of data protected by personal data protection legislation, for external analysis purposes, during which this data will be made anonymous;
- We collect information under the direction of your Supplier, and have no direct relationship with the Recipients whose personal data we process. A Recipient who seeks access, or who seeks to correct, amend, or delete data, or no longer receive Acceptemails from a Supplier should direct his or her query to the Supplier.
- We will retain personal data we process on behalf of your Supplier for as long as needed in order to provide services to your Supplier. We will retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

4. Use of Service Providers

- We may use service providers to operate our Services. These persons or organizations may have access to Recipients' personally identifiable information, but only for the purpose of performing their duties. These providers may not use personally identifiable information for any other purpose;
- Some Suppliers have purchased or use the Acceptemail BV Service via Partners. These partners include for example software vendors, fulfillment companies and consultants. In some situations Recipients' personally identifiable information may be passed to AccectEmail BV by way of these Partners. These Partners are responsible for the personal data that they may have received.
- At the request of Suppliers we work with payment providers; companies (payment service providers, credit card companies, banks, payment processors) that enable and process a financial transaction. We only forward select information to these payment providers: payment description, payment reference and amount. All these data are forwarded to be able to initiate the payment;
- The payment itself is authorized by you. In this process the payment provider may require login details, bank details, credit card details or other information. The payment provider is responsible for the privacy of the personal data that has been added during this payment process (e.g. creditcard number, bank account number, and any other collected information);
- We do not sell, trade, or otherwise transfer to outside parties, Recipients' personal information unless with advance notice; This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving your Supplier and you as a Recipient, so long as those parties agree to keep this information confidential;
- AcceptEmail BV will endeavour to prevent unauthorised disclosures of Recipients' personal information by third parties. However, we are not responsible for any



unauthorised disclosures or other breaches of security or for the actions of others if the information was passed to them with Recipients' or Senders' authority or with the authority of anyone other than us;

• We may disclose Recipients' personal information to screened employees as reasonably necessary for the purposes set out in this policy and for delivering our services to your Supplier.

5. Compliance with Laws

- AcceptEmail BV will not provide any personally identifiable Recipient information to any other persons besides your Supplier and Service Providers, except if we are required to make disclosures by any law, government or private parties in connection with a pending legal or administrative action;
- AcceptEmail BV greatly values the protection of personal data. Personal data are therefore treated with the greatest possible care and are secured. In all cases, AcceptEmail BV complies with the General Data Protection Regulation (GDPR).

6. International data transfers

All information that we collect will be stored and processed in and transferred in a country complying with local data protection laws.

7. Cookies

The AcceptEmail transaction page (https://transaction.acceptemail.com) makes limited use of cookies. Cookies are small text files that are stored in your computer's memory and hard drive when you visit certain web pages.

Cookies that are used on our websites help AcceptEmail to provide customised services and information. We use cookies to gather information on how and when pages in our websites are visited, what our users' technology preferences are and whether our websites are functioning properly.

The website uses the following cookies:

- Google Analytics: This cookie allows us to see information on visitor activities including, but not limited to page views, source and time spent on the website. The information is depersonalised and is displayed as numbers, meaning it can not be traced back to individuals and/or location. This will help to protect visitor privacy. Using Google Analytics we can see what content is popular on our website, and strive to give visitors more of the things they are interested in reading and watching;
- Session cookies: Session cookies enable the website to keep track of a visitor's movement from page to page so they don't get asked for the same information already



given to the site. These cookies allow visitors to proceed through many pages of the site quickly and easily without having to authenticate or reprocess each new area visited.

When Recipients subscribe and use a personal account (site where all payment banners that have been sent to a Recipient email address are being stored), we use session cookies. Session cookies enable the website to keep track of a visitor's movement from page to page so they don't get asked for the same information already given to the site. These cookies allow visitors to proceed through many pages of the site quickly and easily without having to authenticate or reprocess each new area visited.

The site www.allaboutcookies.org includes more information about cookies in general, including instructions for managing cookies on many commonly used browsers, or you may consult the vendor documentation for your specific software.

8. Web Beacons

Some of your Suppliers we work for request us to include a tracking pixel in their emails to track behavior such as when you opened the emails and when clicked on hyperlinks. To do this, we include single pixel gifs, also called web beacons, in emails we send. Web beacons allow them to collect information about when you open the email, your IP address, your browser or email Client type, and other similar details.

9. Retaining personal information

Personal information we process shall not be kept for longer than is necessary for the purpose of our services We save the data of our AcceptEmails for a period of at least one year. We will periodically remove all data older than one year.

In case you want your Personal Information to be deleted, please contact the sender of the Acceptemail.

10. Security of personal information

- We have taken reasonable technical and organizational precautions to prevent the loss, misuse or alteration of Recipients' information;
- We store all the personal Recipient information on our secure (password- and firewallprotected) servers;
- Our transaction website is scanned on a regular basis for security issues and known vulnerabilities in order to make your visit to our application as safe as possible;
- We use regular Malware Scanning;
- Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special rights to such systems, and are



required to keep te information confidential. In addition, all sensitive information you supply is encrypted via Secure Socket Layer (SSL) technology;

- We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information;
- We will take reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal information;
- We will store all the personal information you provide on our secure (password- and firewall-protected) servers;
- AcceptEmail protects your personal information when you log into on our application by requiring the use of a browser software program that supports industry standard SSL encryption with at least 128-bit key lengths. The "128-bit" designation refers to the length of the key used to encrypt the data being transmitted, with a longer key representing a higher level of security;
- In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur: We will notify the users via email (within 7 business days).

11. Your rights

You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to the supply of appropriate evidence of your identity and via the sender of an Acceptemail.