# Klarna's Privacy Notice

It is important to us that you feel safe when you pay with Klarna or use any of our other services. Therefore, we are providing all the information about how we use your personal data in this privacy notice.

## 1. Who is responsible for your personal data?

Klarna Bank AB (publ), registered with the Swedish Companies Registration Office under company number 556737-0431 and with registered office at Sveavägen 46, 111 34 Stockholm, and Klarna Financial Services UK Limited registered at Companies House under company number 14290857, 10 York Road, London SE1 7ND, United Kingdom ("Klarna", "we", "our" or "us"), are each a controller of your personal data in accordance with the EU Data Protection Regulation (the "GDPR") and UK data protection laws (including the retained EU Regulation 2016/679 as incorporated into UK domestic law and as amended from time to time (the "UK GDPR") and the Data Protection Act 2018. If you have any questions regarding the processing of your personal data, please contact our data protection team by writing to privacy@klarna.co.uk.

## 2. Your data protection rights as a data subject

You have several rights under the UK GDPR related to you having control of your personal data and to receive information directly from us on how we process personal data about you. In the following you can read about your rights. If you want to know more or come in contact with us to exercise your rights, the easiest way is to email us on privacy@klarna.co.uk. If you want to receive information about the data Klarna holds about you through so-called subject access, or have certain data deleted, you can send a request to us by filling out this form, which is available on our homepage. For other types of guestions please use the contact details in section 12.

#### Your rights

• Right to have personal data deleted ("Right to be forgotten"). In some cases, you have the right to have us delete personal data about you. For example you can request us to delete personal data that we (i) no longer need for the purpose it was collected for, or (ii) process based on your consent and you revoke your consent. There are situations where Klarna is unable to delete your data, for example, when the data is still necessary to process for the purpose for

which the data was collected, Klarna's interest to process the data overrides your interest in having them deleted, or because we have a legal obligation to keep it. You can read more about our legal obligations to keep data in **section 4** and **9** in this Privacy Notice. The laws described there prevent us from immediately deleting certain data. You also have the right to object to us using your personal data for certain purposes such as direct marketing, which you can read more about in this list of your rights.

- Right to be informed. You have the right to be informed of how we process your personal data.
   We do this through this privacy notice, by service-specific FAQs, and by answering your questions.
- Right to receive access to your personal data ("Data Subject access"). You have the right to know if Klarna processes personal data about you, and to receive a copy ("data extract") of such data, so-called data subject access. Through the data extract you will receive information about what personal data Klarna holds about you and how we process it.
- Right to access, and request a transfer, of your personal data to another recipient ("Data portability"). This right means that you can request a copy of the personal data relating to you that Klarna holds for the performance of a contract with you, or based on your consent, in a machine-readable format. This will allow you to use this data somewhere else, for example to transfer your personal data to another controller/recipient.
- **Right to rectification.** You have the right to request that we rectify inaccurate information or complete information about you that you consider is inaccurate or incomplete.
- Right to restrict processing. If you believe that your personal data is inaccurate, that our
  processing is unlawful or that we do not need the information for a specific purpose, you have the
  right to request that we restrict the processing of such personal data. You also have the possibility
  to request that we stop processing your personal data while we assess your request. If you object
  to our processing per your right described directly below, you may also request us to restrict
  processing of that personal data while we make our assessment.
- Right to object against our processing of your personal data. You have the right to object to
  processing of your personal data which is based on our legitimate interest (Article 6(1)(f) UK
  GDPR), by referencing your personal circumstances. You can also always object to our use of
  your personal data for direct marketing purposes. When you let us know that you no longer wish
  to receive direct marketing from us, we will turn off marketing for you, and stop sending it to you.

- Right to object to an automated decision that significantly affects you. You have the right to
  object to an automated decision made by Klarna if the decision produces legal effects or
  significantly affects you in a similar way. See section 6 on how Klarna makes use of automated
  decisions.
- Right to withdraw your consent. As described in section 5 below, where we process your
  personal data based on your consent or explicit consent, you have the right to revoke that
  consent at any time. When you revoke your consent we will stop processing your data for such
  purposes.
- Right to lodge a complaint. If you have complaints about Klarna's processing of your personal data, you may lodge a complaint with (the Information Commissioner's office (the UK's data protection authority), which can be reached using this link: <a href="https://ico.org.uk/">https://ico.org.uk/</a>.

**Settings in the Klarna mobile application:** In the Klarna mobile application, Klarna provides you with the functionality to tailor your preferences for certain services, such as current notifications.

## 3. What types of personal data do we collect?

In this section, we describe the types of personal data that we collect or create. In **section 4**, we describe for what purposes we use these types of personal data.

- Contact and identification data Name, date of birth, social security number, title, occupation, gender, billing and delivery address, e-mail address, mobile phone number, nationality, age, employment and employment history, audio recordings, photos and video recordings of you and your ID card etc.
- Information about goods/services Details concerning the goods/services you have bought or ordered (or plan to buy or order), such as type of item or delivery tracking number.
- Information about your financial standing Information about, for example, your income, any credits, negative payment history and previous credit approvals.
- Payment information Credit and debit card details (card number, expiry date and CVV code), bank account number, bank name.

- Information about your use of Klarna's services Which service(s) and what different functions
  in these services you have used and how you have used them. This includes information about
  outstanding and historical debt, your repayment history, and your personal preferences including
  derived interests.
- Technical information generated through your use of Klarna's services Technical data such as response time for web pages, logs of the way you navigate through our services, download errors and date and time when you used the service.
- Information about your contacts with Klarna's customer service Recorded phone calls, chat conversations and email correspondence.
- Your contacts with the stores you shop at or visit Information about how you interact with stores, such as whether you have received goods and the type of store you shop at.
- Device information Device ID, IP address, language settings, browser settings, time zone, operating system, platform, screen resolution and similar information about your device and device settings/usage.
- Information from external sanction lists and PEP lists Sanction lists and lists of persons constituting politically exposed persons ("PEP") include information such as name, date of birth, place of birth, occupation or position, and the reason why the person is on the list in question.
- **Sensitive personal data** Sensitive personal data are data that reveal religious beliefs, political or philosophical views, trade union membership, or constitute information about health, sex life or sexual orientation as well as biometric data.
- Service-specific personal data Within the framework of our services through the Klarna,
  Klarna's savings and payment accounts, Auto-Track, and Financial Insights, we use additional
  personal data that are not covered by the types listed above. Information regarding each service
  is listed here:
  - The Klarna mobile application (the "Klarna App") and browser extension (under the Klarna Shopping Service): All content you upload or submit (such as queries, photos, receipts, product & store reviews, or profile picture), location information, geolocation information and websites you visit in the application's browser, or with the extension installed;

- Klarna's savings and payment accounts: Information about your transactions and deposits
  and information about where your money comes from, or will be used for. Klarna will also
  process data about third parties (such as payees or payers) for this service;
- Auto-Track: Information from the connected e-mail account about your completed purchases(such as order number, product, price, purchase date, quantity information, payment method used, promotional codes, delivery tracking numbers and carrier). We also collect information related to the delivery (such as delivery status, shipping address, expected date of delivery), information from emails (such as sender, date of email) and information about stores;
- Financial Insights: Information from your other bank accounts and other types of accounts (such as card accounts) that you choose to connect to the service, as well as information such as account number, bank, historical transactions from your connected accounts and balances and assets:
- Loyalty Cards Feature: Information from your added third-party membership or loyalty card account such as membership information and credentials, points, status, levels, and balance history; and
- Klarna Cashback: Purchase amounts and dates of purchases that take place through the Klarna Cashback program, regardless of whether you have paid with Klarna or not. We also process information about cashback offer rate per purchase and cashback amount received.
- Event registration on social media: Information about your profile from your social media account and business information such as your employer's name, address and type of company.

Detailed information on relevant personal data for each service can also be found in the terms and conditions we have listed here.

# 4. What personal data are used for what purposes and with which legal basis?

In the tables below you can read about,

1. What we will use your personal data for (the purpose),

- 2. Which types of personal data we use for that purpose, and if the personal data comes directly from you or from another source. In the cases where we have received personal data about you from another source, we provide the source in brackets,
- 3. What legal rights we have under current data protection legislation, such as the UK GDPR, to process the data about you, referred to as our "legal basis", and
- 4. When Klarna stops using the personal data for each purpose.

# 4.1 Purposes for which your personal data is always used, regardless of the service you use.

Purpose of the processing - what we do and why.

Type of personal data used for the purpose, and where they come from (the source).
See section 3 to read more about the different types of personal data.

Legal basis for processing according to the UK GDPR.

When the purpose of using the personal data ends. See section 9 for when Klarna deletes the data.

[1] To manage our customer relationship with you in accordance with our agreements, for each service you use. This includes creating and sending information to you in electronic format (not marketing).

From you:

- Contact and identification data.
- Payment information.
- Sensitive personal data.

From other sources:

- Information about goods/services. (The store)
- Information about your financial standing. (Klarna and credit information bureaus)

The processing is necessary for Klarna to perform a contract with you (Article 6(1)(b) UK GDPR).

If the service processes information that constitutes sensitive personal data (e.g., from materials you choose to upload), our processing takes place based on your explicit consent (Article 9(2)(a) UK GDPR).

When the contract between you and Klarna terminates, or you withdraw your consent.

- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Device information.
   (Your device)
- Service-specific personal data (see section 3).

[2] To be able to perform customer satisfaction surveys and market surveys, conduct consumer research as well as ask for reviews from you, through email, text messages, phone or via other communication channels.

#### From you:

- Contact and identification data.
- Information about your use of Klarna's services.

From other sources:

- Information about goods/services. (The store)
- Information about your use of Klarna's services. (Klarna)
- Technical information generated through

The processing is based on a balancing of interests (Article 6(1) (f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in being able to perform the personal data processing, that the processing is necessary to achieve that purpose, and that our interest outweighs your right not to have your data processed for this purpose.

When the contract between you and Klarna terminates. your use of Klarna's services. (Klarna)

 Your contacts with the stores you shop at or visit. (The store) You may contact us for more information about how the determination was made or if you wish to object to this processing. See section 12 for our contact information.

[3] To ensure network and information security in Klarna's services.

#### From you:

 Contact and identification data.

From other sources:

- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Device Information. (Your device)

The processing is based on a balancing of interests (Article 6(1) (f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in being able to ensure network and information security, that the processing is necessary to realise that purpose, and that our interest outweighs your right not to have your data processed for this purpose. It is also in your interest as a customer that we ensure good information security.

This processing lasts for as long as you are using a service.

You may contact us for more information about how the determination was made or if you wish to object to this processing. See

section 12 for our contact information.

[4] To be able to help you as a vulnerable customer (i.e. if you need extra support when contacting us due to particular circumstances). This means that we can offer you special support, for example, when you contact customer service.

#### From you:

- Contact and identification data.
- Sensitive personal data (in the form of information on your health).

From other sources:

 Information about your use of Klarna's services. (Klarna) Based on your consent (Article 6(1)(a) and Article 9(2)(a) UK GDPR).

When you notify us that you are no longer a vulnerable customer or withdraw your consent. We also cease this processing if and when you notify us that you no longer want to be a Klarna customer.

[5] To be able to perform risk analysis, prevent fraud, and carry out risk management.

We perform the processing to confirm your identity and that the data you provide is correct, as well as to counter criminal activities.

This processing constitutes profiling and automated decision-making. We use automated decision-making for this purpose, to be able to determine if you constitute a risk of

#### From you:

- Contact and identification data.
- Payment information.

From other sources:

- Information about goods/services. (The store)
- Information about your financial standing. (Klarna and credit information bureaus)
- Information about your use of Klarna's services. (Klarna)

The processing is necessary for Klarna to be able to execute and perform a contract with you (Article 6(1)(b) UK GDPR).

We are also required by law to establish the identity of our customers (Article 6(1) (c) UK GDPR). (Swedish Law (2017:630) on measures against money laundering and terrorist financing, and the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the

This processing will take place while you use any Klarna service, or until you withdraw your consent.

However, if Klarna has identified a potential risk in how you use Klarna, we will continue to use your information for this purpose and continuously update our risk assessment if there is a risk of fraud. This processing lasts as long as we are required by law to keep your information. See section 9 for more information on our

fraud. See section 6 for more information about profiling and automated decisions.

- Technical information generated through your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Device information.
   (Your device)
- Sensitive personal data. (Your ID documents)

Payer) Regulations 2017 - SI 2017/692).).

Sensitive personal data are processed based on your explicit consent (Article 9(2)(a) GDPR).

obligations and right to retain information according to law.

[6] To anonymise your personal data in order to improve our services and products and to analyse customer behaviour.

#### From you:

- Contact and identification data.
- Payment information.

From other sources:

- Information about goods/services. (The store)
- Information about your financial standing. (Klarna and credit information bureaus)
- Information about your use of Klarna's services. (Klarna)
- Technical information

The processing is based on a balancing of interests (Article 6(1) (f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in anonymising your personal data for product development purposes and in analysing customer behaviour in order to improve the service and customer experience. We ensure that the particular processing this entails is necessary to achieve the purpose in question, and that our interest outweighs

This processing takes place for the entire period during which Klarna must retain the information in its systems, for example to perform the contract executed with you or to comply with applicable law. See section 9 for more information on our obligations and right to retain information according to law.

generated through your use of Klarna's services. (Klarna)

- Your contacts with the stores you shop at or visit. (The store)
- Device information. (Your device)
- Service-specific personal data (see section 3).

your right not to have your data processed for this purpose. By anonymising information concerning you, we also ensure that we use personal data to the lesser extent possible.

You may contact us for more information about how the determination was made or if you wish to object to this processing. See section 12 for our contact information.

[7] To perform data analysis for product development and testing to improve our risk, fraud and credit models and to design and improve our services (if possible, we first anonymise the data, which means that no personal data processing is performed thereafter).

#### From you:

- Contact and identification data.
- Payment information.

From other sources:

- Information about goods/services. (The store)
- Information about your financial standing. (Klarna and credit information bureaus)
- Information about your use of Klarna's

The processing is based on a balancing of interests (Article 6(1) (f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in performing data analysis for product development and testing purposes. We ensure that the processing this entails is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to have your data

This processing takes place for the entire period during which Klarna must retain the information in its systems, for example, to perform the contract executed with you or to comply with applicable law. See section 9 for more information on our obligations and right to retain information according to law.

services. (Klarna)

- Technical information generated through your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Device information.
   (Your device)
- Service-specific personal data (see section 3).

processed for this purpose. Furthermore, our customers benefit from the processing because it helps us deliver error-free and sustainable services. You may contact us for more information about how the determination was made or if you wish to object to this processing. See section 12 for our contact information.

[8] To perform data analysis to measure and improve our marketing and advertising channels (if possible, we first anonymise the data, which means that no personal data processing is performed thereafter).

#### From you:

- Contact and identification data.
- Payment information.

From other sources:

- Information about goods/services. (The store)
- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)

The processing is based on a balancing of interests (Article 6(1) (f) GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in performing data analysis to measure and improve our marketing and advertising channels. We ensure that the processing this entails is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to have your data

This processing takes place for the entire period during which Klarna must retain the information in its systems, for example, to perform the contract executed with you or to comply with applicable law. See section 9 for more information on our obligations and right to retain information according to law.

- Your contacts with the stores you shop at or visit. (The store)
- Device information.
   (Your device)
- Service-specific personal data (see section 3).

processed for this purpose.

You may contact us for more information about how the determination was made or if you wish to object to this processing. See section 12 for our contact information.

[9] To calculate payment commissions to suppliers (if possible, we first anonymise the data, which means that no personal data processing takes place thereafter).

From other sources:

- Information about goods/services. (Klarna)
- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)

The processing is based on a balancing of interests (Article 6(1) (f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in calculating potential commissions. We ensure that the processing this entails is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to have your data processed for this purpose.

You may contact us for more information about how the determination was made or if you wish to object to this processing. See

This processing takes place for up to 90 days after using a service.

section 12 for our contact information.

#### From you:

- Contact and identification data.
- Payment information.

From other sources:

- Information about goods/services. (The store)
- Information about your financial standing. (Klarna and credit information bureaus)
- Information about your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Service-specific personal data (see section 3).

The processing is based on a balancing of interests (Article 6(1) (f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in obtaining statistical data and reports for this purpose. We ensure that the processing this entails is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to have your data processed for this purpose.

You may contact us for more information about how the determination was made or if you wish to object to this processing. See section 12 for our contact information.

This processing takes place for the entire period during which Klarna must retain the information in its systems, for example, to perform the contract executed with you or to comply with applicable law. See section 9 for more information on our obligations and right to retain information according to law.

[11] To check and verify your identity.

[10] To produce

statistics and reports

for economic analysis

or analysis of payment

regions or industries (if

trends or payment volumes in certain

possible, we first

personal data

processing takes

place thereafter).

anonymise the data,

which means that no

#### From you:

Contact and identification data.

The processing is necessary for Klarna to perform a contract with you (Article 6(1)(b) UK GDPR).

As long as you use one of Klarna's services.

[12] To share your personal data with the categories of recipients described in section 7.1 (suppliers and subcontractors, companies within the Klarna Group, persons with authority over your financial transactions, authorities and buyers of receivables, businesses or assets).

All types mentioned in section 3.

Varies depending on the recipient (see section 7.1). This processing takes place for the entire period during which Klarna must retain the data in its systems, for example, to fulfil the agreement with you or to comply with applicable law. See section 9 for more information on our obligations and right to retain information according to law.

[13] To decide what kind of marketing we will provide to you. If you do not want us to perform this processing of your data, please contact us. We will then cease to use your data for marketing. Contact information is available in section 12. The processing may constitute profiling. See section 6 for more information about profiling.

#### From you:

Contact and identification data.

From other sources:

- Information about goods/services. (The store)
- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Device information. (Your device)

The processing is based on a balancing of interests (Article 6(1) (f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in identifying which type of marketing we should provide to you. We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose. We have also considered the fact that marketing is listed as an example of legitimate interest in the UK GDPR.

When the contract between you and Klarna terminates, or if you notify us that you are not interested in this processing.  Service-specific personal data (see section 3). You may contact us for more information about how the determination was made or if you wish to object to this processing. See section 12 for our contact information.

[14] To provide marketing materials and offers to you about other products and services we offer that are similar to those you have already used and that are part of Klarna as a shopping platform.

If you do not want to receive marketing from us, please contact us to let us know. We will then stop processing your data for sending marketing. See section 12 for our contact information.

#### From you:

 Contact and identification data.

From other sources:

- Information about your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)

The processing is based on a balancing of interests (Article 6(1) (f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in sending you marketing about our services and offers. We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your data processed for this purpose. We have also considered the fact that marketing is listed as an example of legitimate interest in the UK GDPR.

You may contact us for more information about how the determination was made or if you wish to object to this When the contract between you and Klarna terminates, or if you notify us that you are not interested in this processing.

processing. See section 12 for our contact information.

### From you:

 Contact and identification data.

From other sources:

- Information about your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)

The processing is based on your consent (Article 6(1)(a) UK GDPR).

Either when you notify us that you want to withdraw your consent or if you notify us that you are not interested in this processing/optout.

[16] To protect Klarna from legal claims and safeguard Klarna's legal rights.

[15] Provide you with

offers, products, or

stores/partners.

and our

services from Klarna,

direct marketing about

 All types mentioned in section 3.

In the event of a dispute, Klarna may also collect other types of personal data concerning you if we need them to exercise our rights.

The processing is based on a balancing of interests (Article 6(1) (f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in being able to protect ourselves from legal claims. We ensure that the processing this entails is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to have your data processed for this purpose.

You may contact us for more information

This processing takes place for the entire period during which Klarna must retain the information in its systems, for example to perform the contract executed with you or to comply with applicable law. See section 9 for more information on our obligations and right to retain information according to law.

about how the determination was made or if you wish to object to this processing. See section 12 for our contact information.

4.2 Purposes for which your personal data are used when you use one of Klarna's payment methods, Klarna at a store, or choose to pay by debit or credit card in Klarna's check-out at a store.

Purpose of the processing - what we do and why.

Type of personal data used for the purpose, and where they come from (the source).

See section 3 to read more about the different types of personal data.

Legal basis for processing according to the UK GDPR.

When the purpose of using the personal data ends. See section 9 for when Klarna deletes the data.

[17] To transfer the store's right to payment for your purchase to Klarna ("factoring"). Klarna's payment methods are offered to UK consumers by Klarna Financial Services UK Limited. except when you choose to pay by debit or credit card without logging in to Klarna. Then that payment is administered by Klarna Bank AB.

#### From you:

- Contact and identification data.
- Payment information.

From other sources:

- Information about goods/services. (The store)
- Information about your financial standing. (Klarna and credit information bureaus)
- Information about your use of Klarna's

The processing is based on a balancing of interests (Article 6(1) (f) UK GDPR). When balancing interests, Klarna has determined that we (and the store) have a legitimate interest in selling or buying your outstanding debt. We ensure that the processing is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to have your data processed

for this purpose.

When the purchase takes place.

services. (Klarna)

- Technical information generated through your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Device information.
   (Your device)

You may contact us for more information about how the determination was made or if you wish to object to this processing. See section 12 for our contact information.

[18] To share your personal information with the categories of recipients described in section 7.2 (stores, payment service providers and financial institutions, fraud prevention agencies and companies providing identity information, and Google).

#### From you:

- Contact and identification data.
- Payment information.

From other sources:

- Information about goods/services. (The store)
- Information about your financial standing. (Klarna and credit information bureaus)
- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)

Varies depending on the recipient (see section 7.2).

Primarily when the purchase takes place, but it also occurs during the entire period that Klarna has the data in its systems, i.e. until the data is deleted. See section 9 for more information on our obligations and right to retain information according to law.

- Your contacts with the stores you shop at or visit. (The store)
- Device information. (Your device)

[19] When you shop in a store that offers Klarna as a payment method or has Klarna checkout, we will assess the order in which different payment methods should be presented to you at the store checkout. This processing does not affect which of Klarna's payment methods are available to you.

This processing constitutes profiling.
See section 6 for more information about profiling.

#### From you:

 Contact and identification data.

From other sources:

- Information about goods/services. (The store)
- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)

If you have accepted and use the Klarna service called "Shopping Service" as described in more detail in the terms and conditions of the service, which you will find here, then the legal basis for the processing is the performance of the contract (Article 6(1)(b) UK GDPR). Alternatively, if you have not entered into

the "Shopping Service" agreement, the processing will be based on a balancing of interests instead (Article 6(1)(f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in examining the order in which different payment options will be presented to you when checking out at the store. We ensure

When the payment methods are shown at checkout.

that the processing this entails is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to have your data processed for this purpose. You may contact us for more information about how the determination was made or if you wish to object to this processing. See section 12 for our contact information.

[20] To prevent Klarna's operations from being used for money laundering or terrorist financing, by verifying your identity, monitoring and reviewing transactions. Klarna also conducts ongoing risk assessments and creates risk models to counter money laundering and terrorist financing. This processing constitutes profiling and automated decision making. See section 6 for more information about profiling and automated decisions.

From you:

- Contact and identification data.
- Payment information.
- Sensitive personal data.

From other sources:

- Information about goods/services.
- Information about your financial standing. (Klarna and credit information bureaus)
- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Device information (Your device)
- Information from external sanction lists and PEP lists. (Sanction lists and PEP lists)

To comply with law (Article 6(1)(c) UK GDPR). (Swedish Law (2017:630) on measures against money laundering and terrorist financing).

As regards sensitive personal data, the basis is that the processing is necessary for reasons of the public interest (Article 9(2)(g) UK GDPR).
However, if you have supplied us with sensitive personal

data, it is processed

consent.

based on your explicit

When the agreement between you and Klarna is terminated, or you withdraw your consent. See section 9 for more information on our obligations and right to retain information in accordance with the law.

- Sensitive personal data (information about political opinion, religious beliefs and/or health information contained in the PEP lists, as well as biometric information from your ID and picture submitted).
- Service-specific personal data (see section 3 for information about Klarna's savings and payment accounts).

[21] To perform a fraud prevention assessment before a purchase is accepted. This processing constitutes profiling and automated decision-making. We use automated decision-making for this purpose, to be able to determine if you constitute a risk of fraud. See section 6 for more information about profiling and automated decisions. Also see section 7.2.3 on our use of fraud prevention agencies to which your information

#### From you:

- Contact and identification data.
- Payment information.

From other sources:

- Information about goods/services. (The store)
- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)

To enter into and perform the agreement (Article 6(1)(b) UK GDPR).
Sensitive personal data are processed based on your explicit consent (Article 9(2)(a) GDPR).

When the fraud assessment is performed, or you withdraw your consent.

may be shared, and our legal basis for that sharing. If we identify potential fraudulent transactions we will also report this to our fraud prevention bureaus as set out in Section 7.2.3.

- Your contacts with the stores you shop at or visit. (The store)
- Device information. (Your device)
- Sensitive personal data. (Biometric information from your ID and picture submitted).

In addition to the above, Klarna receives information from fraud prevention agencies on whether your information indicates an attempt at fraud.

[22] To perform bookkeeping and accounting in accordance with accounting laws and preserve them in compliance with the applicable law.

#### From you:

- Contact and identification data.
- Payment information.

From other sources:

- Information about goods/services. (The store)
- Information about your use of Klarna's services. (Klarna)
- Information about your contacts with Klarna's customer service. (Klarna)

To comply with law (Article 6(1)(c) UK GDPR) (The Swedish Accounting Act (1999:1078)), and the UK Companies Act 2006)

During the period in which the bookkeeping is recorded and 7 years after the end of the year in which the information was registered. See section 9 for more information on our obligations and right to retain information according to law.

 Your contacts with the stores you shop at or visit. (The store)

#### From you:

- Contact and identification data.
- Payment information.

#### From other sources:

 Information about goods/services. (The store)

[23] To perform calculations in accordance with rules on capital adequacy obligations.

- Information about your financial standing. (Klarna and credit information bureaus)
- Information about your use of Klarna's services. (Klarna)
- Service-specific personal data (see section 3 for information about Klarna's savings and payment accounts).

To comply with law
(Article 6(1)(c) UK
GDPR). (Capital
Adequacy Regulation
575/2013, and Capital
Adequacy Directive
2013/36))

Seven years after the end of the year in which the information was registered. See section 9 for more information on our obligations and right to retain information according to law.

# 4.3 Purposes for which your personal data is used when you use one of Klarna's payment methods involving the provision of credit or when you use the Klarna card or the One-time Card Shopping Service.

The following services involve providing credit to you: "Pay later" (invoice), "Pay now" (for payment by direct debit), "Financing" and "Pay in 3 instalments" (pay in instalments), as well as the Klarna card and the One-time Card Shopping Service (both of which are offered in the Klarna mobile application or browser extension).

Purpose of the processing - what we do and why.

Type of personal data used for the purpose, and where they come from (the source).
See section 3 to read more about the different types of personal data.

Legal basis according to the UK GDPR.

When the purpose of using the personal data ends. See section 9 for when Klarna deletes the data.

[24] To perform a credit assessment before credit is granted.

This constitutes profiling and the decision to approve or reject the credit constitutes an "automated decision". See section 6 for more information about profiling and automated decisions. Also see section 7.3.1 on our use of credit information bureaus to which your information may be shared, and our legal basis for that sharing.

From you:

 Contact and identification data.

From other sources:

- Information about your financial standing. (Klarna and credit information bureaus.
- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)

To enter into and perform the credit agreement (Article 6(1) (b) UK GDPR).

When the credit assessment is performed.

[25] Determining which is the most efficient way to contact you about your outstanding debt. This will not affect communications which are legally required under

From other sources:

- Information about goods/services. (The store)
- Information about your use of Klarna's services. (Klarna)

The processing is based on a balancing of interests (Article 6(1) (f) GDPR). When balancing interests, Klarna has determined that we (and you) have a legitimate interest in making sure you are contacted in an

As long as you have outstanding debt with Klarna.

consumer credit
legislation.
This processing
constitutes profiling.
See section 6 for more
information about
profiling.

efficient manner about your outstanding debt. We ensure that the processing is necessary to pursue that interest, and that our interest outweighs your right not to have your data processed for this purpose. You may contact us for more information about how the determination was made or if you wish to object to this processing. See section 12 for our contact information.

[26] To share your personal data with the types of recipients described in section 7.3 (credit bureaus, debt collection companies and other buyers of outstanding receivables, as well as VISA, debt acquirers and digital wallet providers).

#### From you:

- Contact and identification data.
- Payment information.
- Information that you are a vulnerable customer where applicable.

From other sources:

- Information about goods and services. (The store)
- Information about your financial standing. (Klarna and credit information bureaus)

Varies depending on the recipient (see section 7.3). Primarily when the purchase takes place, but also as long as Klarna retains the data in its systems, i.e., until it is deleted. See section 9 for more information on our obligations and right to retain information according to law.

- Information about your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Device information.
   (Your device)

From you:

 Contact and identification data.

From other sources:

- Information about goods/services. (The store)
- Information about your financial standing. (Klarna and credit information bureaus)
- Information about your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)

The processing is based on a balancing of interests (Article 6(1) (f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in selling outstanding credits as part of conducting our business. We ensure that the processing is necessary to pursue that interest, and that our interest outweighs your right not to have your data processed for this purpose. You may contact us for more information about how the determination was made or if you wish to object to this processing. See section 12 for our

contact information.

The processing may be performed while the debt is unpaid (you will be notified if the debt is transferred).

[27] To transfer Klarna's right to payment for your purchase to a new owner.

#### From you:

 Contact and identification data.

From other sources:

- Information about goods/services. (The store)
- Information about your financial standing. (Klarna and credit information bureaus)
- Information about your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)

The processing is based on a balancing of interests (Article 6(1) (f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in collecting and selling debts. We ensure that the processing this entails is necessary to achieve the purpose of the processing, and that our interest outweighs your right not to have your data processed for this purpose. You may contact us for more information about how the determination was made or if you wish to object to this

When the debt has been paid.

[29] To prevent
Klarna's operations
from being used for
money laundering or
terrorist financing, by
verifying your identity,
monitoring and
reviewing transactions,
conducting risk
assessments and
creating risk models.

[28] To perform debt

to collect and sell

overdue debts.

collection services, i.e.

#### From you:

- Contact and identification data.
- Payment information.

From other sources:

 Information about goods/services. (The store) To comply with law
(Article 6(1)(c) UK
GDPR). (Swedish Law
(2017:630) on
measures against
money laundering
and terrorist
financing).
As regards sensitive

processing. See section 12 for our contact information.

As regards sensitive personal data, the condition is that the

Up to five years from the termination of the agreement or after the termination of the customer relationship (up to ten years in cases where law enforcement authorities so request). See section 9 for more information on our obligations and right

This processing constitutes profiling, and a decision that you imply a money laundering risk constitutes an "automated decision". See section 6 for more information about profiling and automated decisions.

- Information about your financial standing. (Klarna and credit information bureaus)
- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Device information. (Your device)
- Information from external sanction lists and PEP lists. (Sanction lists and PEP lists)
- Sensitive personal data (information about political opinion, religious beliefs and/or health information contained in the PEP lists, as well as biometric information from your ID and picture submitted).

processing is necessary in the public interest (Article 9(2)(g) UK GDPR).

to retain information according to law.

#### From you:

- Contact and identification data.
- Payment information.

#### From other sources:

- Information about goods/services. (The store)
- Information about your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Service-specific personal data (see section 3 for information about Klarna's savings and payment accounts).

To comply with law
(Article 6(1)(c) UK
GDPR). (The Swedish
Accounting Act
(1999:1078)), and the
UK Companies Act
2006)

Seven years after the end of the year in which the information was registered. See section 9 for more information on our obligations and right to retain information according to law.

# 4.4 Use of your (and third parties') personal data to give you access to Klarna account services (Klarna balance, savings, and payment accounts).

Purpose of the processing – what we do and why.

[30] Filing and

accounting in

accordance with

accounting laws.

Type of personal data used for the purpose, and where they come from (the source).

See section 3 to read more about the different types of personal data.

Legal basis according to the UK GDPR.

When the purpose of using the personal data ends. See section 9 for when Klarna deletes the data.

[31] Not applicable in your market.

[32] To provide Klarna's savings and payment accounts.

#### From you:

- Contact and identification data.
- Sensitive personal data.

#### From other sources:

- Information about your financial standing. (Klarna and credit information bureaus)
- Service-specific personal data (see section 3 for information about Klarna's savings and payment accounts).

The processing is necessary for Klarna to perform a contract with you (Article 6(1)(b) UK GDPR).
Information about third

Information about third parties (such as payment recipient or payer) is based on a balancing of interests (Article 6(1)(f) UK GDPR). When balancing interests.

(Article 6(1)(f) UK
GDPR). When
balancing interests,
Klarna has determined
that we and you (and
also the payment
recipient/payer) have a
legitimate interest in
having these data
processed to perform
the transactions in

question. We ensure that the processing

necessary to pursue

this entails is

that interest, and that our interest outweighs your right not to have your information processed for this purpose. You may contact us for more information

about how the determination was

made. See section 12

When the contract between you and Klarna terminates.

for our contact information.

From you:

- Contact and identification data.
- Sensitive personal data.

[33] To share your personal data with the categories of recipients described in section 7.4 (credit institutions and other financial institutions).

From other sources:

- Information about your financial standing. (Klarna and credit information bureaus)
- Service-specific personal data (see section 3 for information about Klarna's savings and payment accounts).

The processing is necessary for Klarna to perform a contract with you (Article 6(1)(b) UK GDPR). The service terms are available here.

When the contract between you and Klarna terminates.

[34] To prevent Klarna's operations from being used for money laundering or terrorist financing, by verifying your identity, monitoring and reviewing transactions, conducting risk assessments and creating risk models. This processing constitutes profiling, and a decision that you imply a money laundering risk constitutes an automated decision.

From you:

- Contact and identification data.
- Payment information.

From other sources:

- Information about goods/services. (The store)
- Information about your financial standing. (Klarna and credit information bureaus)

To comply with law
(Article 6(1)(c) UK
GDPR) (Swedish Law
(2017:630) on
measures against
money laundering
and terrorist
financing, and the UK
Money Laundering,
Terrorist Financing
and Transfer of
Funds (Information
on the Payer)
Regulations 2017 - SI
2017/692).

As regards sensitive personal data, the

Up to five years from the termination of the contract or after the termination of the customer relationship (up to ten years in cases where law enforcement authorities so request). See section 9 for more information on our obligations and right to retain information according to law.

See section 6 for more information about profiling and automated decisions.

- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Device information.
   (Your device)
- Information from external sanction lists and PEP lists. (Sanction lists and PEP lists)
- Sensitive personal data (information about political opinion, religious beliefs and/or health information contained in the PEP lists, as well as biometric information from your ID and picture submitted).
- Service-specific personal data (see section 3 for information about

condition is that the processing is necessary in the public interest (Article 9(2)(g) UK GDPR).

Klarna's savings and payment accounts).

#### From you:

- Contact and identification data.
- Payment information.

From other sources:

- Information about goods/services. (The store)
- Information about your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)

To comply with law
(Article 6(1)(c) UK
GDPR) (The Swedish
Accounting Act
(1999:1078)), and the
UK Companies Act
2006)

Seven years after the end of the year in which the information first was registered.

See section 9 for more information on our obligations and right to retain information according to law.

[36] To perform calculations in accordance with rules on capital adequacy obligations.

[35] Filing and

accounting in

accordance with

accounting laws.

#### From you:

- Contact and identification data.
- Payment information.

From other sources:

- Information about goods/services. (The store)
- Information about your financial standing. (Klarna and credit information bureaus)

To comply with law (Article 6(1)(c) UK GDPR) (Capital Adequacy Regulation 575/2013, and Capital Adequacy Directive 2013/36))

Seven years after the end of the year in which the information was registered. See section 9 for more information on our obligations and right to retain information according to law.

- Information about your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Device information.
   (Your device)
- Service-specific personal data (see section 3 for information about Klarna's savings and payment accounts).

[37] Not applicable in your market.

#### 4.5 Use of your personal data when you use Klarna's Shopping Service.

When you use Klarna's Shopping Service, Klarna will process your personal data for the purposes described in the table below. The terms of the Shopping Service and the description of the functions included in the shopping service are available **here**.

Purpose of the processing - what we do and why.

Type of personal data used for the purpose, and where they come from (the source).
See section 3 to read more about the different types of personal data.

Legal basis according to the UK GDPR.

When the purpose of using the personal data ends. See section 9 for when Klarna deletes the data.

[38] To deliver Klarna's Shopping Service and the functions included therein.

The service involves profiling you to personalise the content in the Klarna mobile application and at Klarna's checkout.

- All types mentioned in section 3:
- Names and addresses you add as delivery addresses on your User Account. Service-specific personal data (see section 3).
- Sensitive personal data.

The processing is necessary for Klarna to perform a contract (terms and conditions for the shopping service) with you (Article 6(1)(b) UK GDPR).

If the shopping service also processes data that constitutes sensitive personal data (if you have uploaded this data, for example, through receipts for certain

purchases/memberships,consent. through product & store reviews or if you have otherwise given us access to this data), our processing takes place based on your explicit consent (Article 9(2)(a) UK GDPR). See section 3 for more information about this kind of

When the contract between you and Klarna terminates or you withdraw your

[39] You can choose to share your location and geolocation information with us. We use this information to find stores and offers in your vicinity, to present in the Klarna mobile application or at Klarna.com.

#### From you:

 Service-specific personal data (see section 3, location and geolocation information).

The processing is necessary for Klarna to perform a contract (terms and conditions for the shopping service) with you (Article 6(1)(b) UK GDPR).

personal data.

When the contract between you and Klarna terminates.

You can turn off location and geolocation information sharing on your device at any time.

[40] To provide a browser, through the Klarna mobile application, for you to visit, for example, stores' websites. Klarna will collect information about how you use the browser to customise the contents of the Klarna mobile application.

#### From you:

- Sensitive personal data.
- Service-specific personal data (see section 3 for information about the Klarna mobile application).

From other sources:

 Information about goods/services.
 (Klarna or store you shop from) The processing is necessary for Klarna to perform a contract (terms and conditions for the shopping service) with you (Article 6(1)(b) UK GDPR).

If the service processes information that constitutes sensitive personal data (e.g. from pages you visit), our processing will take place based on your explicit consent (Article 9(2)(a) UK GDPR). However, this sensitive information will not be used for any purpose other than to show you the current

When the contract between you and Klarna terminates.

[41] To perform fraud prevention assessments when using the Klarna Shopping Service. This processing constitutes profiling and automated decision-making. We

#### From you:

 Contact and identification data.

From other sources:

 Information about your use of Klarna's services. (Klarna) The processing is necessary for Klarna to perform a contract (terms and conditions for the shopping service) with you (Article 6(1)(b) UK GDPR).

website in the browser.

When the fraud assessment is performed.

use automated decision-making for this purpose, to be able to determine if you constitute a risk of fraud. See section 6 for more information about profiling and automated decisions.

Also see section 7.5.6 on our use of fraud prevention agencies to which your information may be shared, and our legal basis for that sharing.

- Technical information generated through your use of Klarna's services. (Klarna)
- Your contacts with the stores you shop at or visit. (The store)
- Device information. (Your device)

In addition to the above, Klarna receives information from fraud prevention agencies on whether your information indicates an attempt at fraud.

[42] To share your personal data with the categories of recipients described in section 7.5 (affiliate networks, Google, partners within the framework of the Financial Insights service and the offer and benefit program, and logistics and transportation companies, Advertising services, third-party apps and services (for SIWK), fraud prevention

agencies and

#### From you:

- Contact and identification data.
- Sensitive personal data (if you have uploaded or otherwise given us access to such data).

From other sources:

- Information about goods/services. (The store)
- Device information. (Your device)

Varies depending on the recipient (see section 7.5). When the contract between you and Klarna terminates.

companies providing identity checks).

 Service-specific personal data (see section 3 for information about the Klarna mobile application).

[43] To show you relevant Klarna advertising through our third party advertising services on non-Klarna sites

on non-Klarna sites and non-Klarna advertising through digital advertising platforms in the Klarna App and in Klarna's marketing channels.

We also assess the relevancy of such advertising. This is based on your user behaviour and Klarna profile.

You may see such relevant advertisements when you are on other websites and apps, delivered to you through those third party advertising services or in the Klarna App through the digital advertising platforms. See section 7.5.5 for

information about this

From you:

Contact and identification data.

From other sources:

- Information about your use of Klarna's services. (Klarna)
- Device information. (Klarna)

This is based on where you have given your consent (under Article 6(1)(a) UK GDPR).

Either when you notify us that you want to withdraw your consent or if you notify us that you are not interested in this processing.

We will also cease this processing if and when you notify us that you no longer want to be a Klarna customer.

data sharing.
This processing may constitute profiling which aims to customise the marketing based on what we think you may be interested in. You can read more about profiling in section 6.

#### From you:

 Contact and identification data.

[44] To determine your eligibility for earning cashback when you make purchases through a cashback offer in the Klarna app, and to calculate the due cashback amount.

From other sources:

- Information about goods/services. (The store).
- Device information. (Klarna)
- Service-specific personal data (see section 3 for information about Klarna Cashback).

This processing is necessary for Klarna to perform a contract (terms and conditions for the Klarna Cashback program) with you (Article 6(1)(b) GDPR).

When the contract between you and Klarna terminates.

[45] If you choose to sign in with Klarna (through "SIWK") at a third-party app or service, Klarna will share your personal data with the store or on-line service.

#### From you:

 Contact and identification data.

From other sources:

- Contact and identification data (Klarna).
- Information about goods/services (Klarna)

The processing is necessary for Klarna to perform a contract (terms and conditions for the shopping service) with you (Article 6(1)(b) UK GDPR).

When the contract between you and Klarna terminates.

We will also cease this processing if and when you notify us that you no longer want to use this specific functionality.

#### From you: Contact and identification data. Information about [46] To automatically your contacts with manage purchase Klarna's customer disputes or complaints service. about goods. From other sources: This processing constitutes automated The processing is Device information. decision-making. We necessary for Klarna (Your device) to perform a contract use automated When the dispute has Information about (terms and conditions decision-making for been managed. your use of Klarna's this purpose to be for the shopping services. (Klarna) service) with you able to ensure timely (Article 6(1)(b) GDPR). and consistent Technical outcomes of disputes information or complaints. See generated through section 6 for more your use of Klarna's information about services. (Klarna) automated decisions. Information about your contacts with Klarna's customer service. (Klarna)

[47] To present you with relevant content and product recommendations when you use our product expert- and shopping assistant functionality. These assistants base their recommendations on information we have about you, together with preferences or queries you provide.

#### From you:

- Contact and identification data.
- Service-specific personal data (see section 3 for information about the Klarna mobile application).

From other sources:

Information about goods/services.

The processing is necessary for Klarna to perform a contract (terms and conditions for the shopping service) with you (Article 6(1)(b) GDPR).

When the contract between you and Klarna terminates.

This processing constitutes profiling.
See section 6 for more information about profiling.

(Klarna and stores)

- Information about your financial standing. (Klarna)
- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)
- Device information.
   (Your device)

[48] To provide feedback or new ideas to our feedback assistant.

#### From you:

- Contact and identification data.
- Service-specific personal data (see section 3 for information about the Klarna mobile application).

The processing is based on a balancing of interests (Article 6(1) (f) GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in being able to perform the personal data processing, that the processing is necessary to achieve that purpose, and that our interest outweighs your right not to have your data processed for this purpose. You may contact us for more information about how the determination was made or if you wish to

When the feedback has been provided and managed.

object to this processing.
See section 12 for our contact information.

# 4.6 Additional services you can access for example via the Klarna mobile application or through Klarna's browser extension.

Purpose of the processing - what we do and why.

Type of personal data used for the purpose, and where they come from (the source).

See section 3 to read more about the different types of personal data.

Legal basis according to the UK GDPR.

When the purpose of using the personal data ends. See section 9 for when Klarna deletes the data.

[49] If you have connected your e-mail account to Klarna's Auto-Track service, Klarna will regularly connect to your e-mail account(s) to obtain information about your purchases.

You can terminate this service at any time and thereby delete Klarna's access to your e-mail account.

From other sources:

- Sensitive personal data. (The webmail provider)
- Service-specific personal data (see section 3 for information about Auto-Track). (The webmail provider)

The processing is necessary for Klarna to perform a contract (terms and conditions for the shopping service) with you (Article 6(1)(b) UK GDPR). If the service processes sensitive personal data (from your transactions), our processing will take place based on your explicit consent (Article 9(2)(a) UK GDPR). See section 3 for more descriptive information.

When the contract between you and Klarna terminates or you withdraw your consent.

[50] If you have chosen to connect your bank accounts to the Financial Insights

From other sources:

Sensitive personal data. (Your

The processing is necessary for Klarna to perform a contract (terms and conditions When the contract between you and Klarna terminates or service, Klarna will display and give you tools to control your finances, by means of offers tailored to your specific needs. This processing constitutes profiling which aims to customise the service's content based on what we think you may be interested in. You can read more about profiling in section 6. If you choose to take advantage of offers and benefits that Klarna delivers within the framework of this service, we will share your personal information with the partner who delivers these (see section 7.5.3).

connected account)

 Service-specific personal data (see section 3 for information about Financial Insights). (Your connected account) for the shopping service) with you (Article 6(1)(b) UK GDPR). If the service processes sensitive personal data (from your transactions), our processing will place based on your explicit consent (Article 9(2)(a) UK GDPR). See section 3 for more information.

you withdraw your consent.

[51] If you use our browser extension, Klarna will process your data to deliver the service, which includes processing information about which websites/web domains you visit: Klarna processes information about the ecommerce websites/web domains

#### From you:

- Contact and identification data.
- Information about goods/services.
- Payment information.
- Your contacts with the stores you shop at or visit.

The processing is necessary for Klarna to perform a contract (terms and conditions for the Klarna Shopping Service) with you (Article 6(1)(b) UK GDPR). If the service processes information that constitutes sensitive personal data (i.e. such data about

When the contract between you and Klarna terminates or you withdraw your consent.

you visit in order to identify deals, offer cash back and provide you with customised offers in the Klarna extension and mobile application. This processing is also done to allow you to create One-time Cards directly in your browser on websites where this service is enabled. Information about nonecommerce websites/web domains visited will not be stored by Klarna. Read more about how your personal data is used in the extension

- Sensitive personal data.
- Service-specific personal data (see section 3 for information about the Klarna mobile application and browser extension).

From other sources:

- Device information.
   (Your device)
- Information about your use of Klarna's services. (Klarna)
- Technical information generated through your use of Klarna's services. (Klarna)

the websites/web domains you visit), our processing will be based on your explicit consent (Article 9(2)(a) UK GDPR). See section 3 for more information about this kind of personal data.

[52] If you have added a third-party membership or loyalty card account to Klarna's Loyalty Cards Feature, Klarna will process your data to deliver the service. This includes Klarna regularly connecting to your third-party card account to import membership points, levels, and balance history. You can terminate this service at any time

FAQ.

From other sources:

 Service-specific personal data (see section 3 for information about the Loyalty Cards Feature). (Your connected thirdparty membership or loyalty card account) The processing is necessary for Klarna to perform a contract (terms and conditions for the shopping service) with you (Article 6(1)(b) UK GDPR).

When the contract between you and Klarna terminates.

and thereby revoke Klarna's access to your membership or loyalty card account.

# 4.7 Offers and invitations to events posted on social media, and when you contact us through social media.

Purpose of the processing - What we do and why.

Type of personal data used for the purpose, and where they come from (the source).

See section 3 to read more about the different types of personal data.

Legal basis for processing in accordance with the UK GDPR.

When the purpose of using the personal data ends. See section 9 for when Klarna deletes the data.

[53] If you sign up for an event posted on social media, we will process your personal data to provide the requested service. You can always unsubscribe from this by contacting us. See section 12 for contact information.

From you:

- Contact and identification data.
- Service-specific personal data (see section 3 regarding registrations for events on social media).

The processing Is necessary for Klarna to perform a contract with you (as regards the participation in the event) (Article 6(1)(b) UK GDPR).

You may contact us for more information about how the determination was made. See section 12 for our contact information.

When the event has been held.

### 4.8 Klarna's processing when you contact Klarna's customer service.

Purpose of the processing - What we do and why.

Type of personal data used for the purpose, and where they come from (the source).

See section 3 to read more about the

Legal basis for processing in accordance with the UK GDPR.

When the purpose of using the personal data ends. See section 9 for when Klarna deletes the data.

## different types of personal data.

[54] To handle all matters that come to Klarna's customer service.

This includes retaining various forms of written conversations to document customer issues, as well as for security purposes and to counter fraud.

#### From you:

 Information about your contacts with Klarna's customer service.

From other sources:

 Information about your contacts with Klarna's customer service. (Klarna) Performance of contracts (Article 6(1) (b) UK GDPR).

Up to ten years, based on the statute of limitations. See section 9 for more information on our obligations and right to retain information according to law.

#### From you:

 Contact and identification data.

#### From other sources:

[55] To help you solve issues related to your purchases when you use our customer service assistant.
This processing constitutes profiling.

See section 6 for more

information about

profiling.

- Information about your financial standing.
- Information about goods/services.
- Payment information.
- Information about your use of Klarna's services
- Information about your contacts with Klarna's customer service. (Klarna)

The processing is necessary for Klarna to perform a contract (terms and conditions for the shopping service) with you (Article 6(1)(b) GDPR).

When the contract between you and Klarna terminates.

[56] Quality and service improvement (to ensure satisfactory

#### From you:

 Information about your contacts with The processing is based on a balancing of interests (Article 6(1)

We process the recordings of telephone

customer service). We may record telephone conversations as well as screen sharing sessions between you and our employees for quality purposes in order to deliver better products and services to you.

Klarna's customer service.

From other sources:

 Information about your contacts with Klarna's customer service. (Klarna)

(f) GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in improving our services, our internal training and quality control. We ensure that the particular processing this involves is necessary to achieve that purpose, and that our interest outweighs your right not to have your data processed for this purpose. As a customer, you also have an interest in the quality of your interactions with Klarna. You may contact us for more information about how the determination was made or if you wish to object to this processing. Please see the contact

conversations for up to 90 days for quality assurance purposes, and the recorded screen sharing sessions for up to 30 days for quality assurance purposes.

[57] Documenting what has been said when talking to our customer service (to ensure we have documented what has been agreed or

#### From you:

 Information about your contacts with Klarna's customer service.

From other sources:

The processing is based on a balancing of interests (Article 6(1) (f) UK GDPR). When balancing interests, Klarna has determined that we have a

information in section

12.

We process the recordings of telephone conversations for up to three years and the phone call notations up to six years, in

discussed). We use recorded telephone conversations between you and our employees as well as manual and automated notations to document what has been said.

 Information about your contacts with Klarna's customer service. (Klarna)

legitimate interest to document communications with Klarna's customer service. We ensure that the particular processing this entails is necessary to achieve that purpose, and that our interest outweighs your right not to have your data processed for this purpose. As a customer, you also have an interest in ensuring impartial means of documenting what has been discussed. You may contact us for more information about how the determination was made or if you wish to object to this processing. Please see the contact

order to document what has been discussed and decided on the call.

[58] If you contact us via social media such as Facebook, Instagram or Twitter, your personal data will also be collected and processed by these companies, in accordance with their privacy notices. The

#### From you:

- Contact and identification data.
- Information about your contacts with Klarna's customer service.

From other sources:

Performance of contracts (Article 6(1) (b) UK GDPR).

information in section

12.

When we have answered your question.

same is true for the answer you get from us. Klarna processes this information to answer your questions.

 Information about your contacts with Klarna's customer service. (Klarna)

[59] To handle voluntary blocks for using Klarna's services, i.e. if you contact us and ask us to prevent you from being able to use our services. Your voluntary block can be lifted by you at any time by contacting us again.

From you:

- Contact and identification data.
- Information about your contacts with Klarna's customer service.

Based on your consent (Article 6(1)(a).

When you notify us that you no longer want to be blocked from using our services or withdraw your consent. We also cease this processing if and when you notify us that you no longer want to be a Klarna customer at all.

### 5. How do you withdraw your consent?

When Klarna uses your personal data based on your consent, you can withdraw your consent at any time. You can do this by sending an e-mail to **privacy@klarna.co.uk** or via the contact information you find in **section 12**.

You can also delete uploaded information from the Klarna mobile application, or end the service where personal data are processed. We will then delete the information. If you withdraw your consent or delete the uploaded information, you may be unable to use the service in cases where Klarna's processing of personal data takes place based on your consent.

Lastly: As described in section 2 above you also have the right to *object* against certain personal data processing (for example you may turn off marketing). You also have a right to have certain personal data *erased*, which is also described in **section 2**.

# 6. Klarna's profiling and automated decisions that significantly affect you.

#### 6.1 Klarna's profiling of you as a customer.

"Profiling" means an automated processing of personal data to evaluate certain personal matters, for example, by analysing or predicting your personal preferences, such as buying interests. At the same time, we compare your data with what our other customers, with similar use of our services, have preferred.

The purpose of Klarna's profiling and the personal data types used for each occasion and for each profiling are described in detail in **section 4** above. You can match the below descriptions with the purposes in section 4 above using the numbers in brackets "[x]". The profiling for these purposes does not have a significant impact on you as a customer.

We use profiling for the following purposes:

- to deliver our customised services, which customise their content and recommendations based on what we think is most interesting or relevant to you (this applies to the Klarna mobile application, its various functions such as the product expert and shopping assistants, when you interact with our customer service assistant and the order different payment methods appear at Klarna's checkout), (Purposes [19, 38, 47, 50 and 55] in section 4)
- to determine which is the most efficient way to contact you about your outstanding debt (looking at different channels, for example by sms or email, or the timing of such communication), (Purpose [25] in section 4) and
- to deliver customised marketing to you across both our own and external platforms and services. (Purposes [13 and 43] in section 4)

Our services utilise machine learning models and artificial intelligence models in order to provide you with as relevant content as possible.

If you have any questions about how the profiling process works, please contact us. Contact information is available in **section 12**. You may object to our marketing profiling at any time by contacting us (and we will then cease profiling for marketing purposes). You may also end our profiling for our services by terminating the service.

### 6.2 Klarna's automated decisions that significantly affect you.

Automated decisions with legal effect, or automated decisions that similarly significantly affect you, means that certain decisions in our services are completely automated, without our employees being involved. These decisions have a significant effect on you as a customer, comparable to legal effects. By making such decisions automatically, Klarna increases its objectivity and transparency in the decision to offer you these services. At the same time, you have the right to object to these decisions

at all times. You can read about how to object to these decisions at the end of this section 6.2. When doing these assessments we utilise machine learning models and artificial intelligence models in order to ensure as high quality as possible in our decisions.

Automated decisions that significantly affect you also mean that profiling is performed based on your data before the decision is made. This profiling is made to assess your financial situation (before the decision to offer or grant credit), to identify whether your use of our services involves a risk of fraud or money laundering or to decide whether you are liable for a purchase. We profile your user behaviour and financial standing and compare this data with behaviours and conditions that indicate different risk levels for us.

The different user behaviour and conditions are evaluated and weighted into our automated decision-models, so that we end up with a totalling score, which then results in either accepting or rejecting your use of our Services. We can also choose to request further identification from you, if we are not sure who you are.

When does Klarna take automated decisions that significantly affect you?

The personal data types used in each decision are described in section 4. You can match the below descriptions with the purposes in section 4 above using the numbers in brackets "[x]".

We make this kind of automated decision when we:

- decide to approve your application, or to offer you, to use a credit service.
- decide not to approve your application, or not to offer you, to use a credit service. These automated credit decisions are based on the data you provide to us, data from external sources such as credit bureaus' credit worthiness reports, and Klarna's own internal information about you if we have lent you money before. In addition to information about you, Klarna's credit model includes a large number of other factors, such as Klarna's internal credit risk levels and our customers' general repayment rates (based on, for example, the current product category). (Purposes [24 and 31] in section 4).
- decide whether you pose a risk of fraud, if our processing shows that your behaviour indicates possible fraudulent conduct, that your behaviour is not consistent with previous use of our services, or that you have attempted to conceal your true identity. Automated decisions whereby we assess whether you constitute a fraud risk are based on information you have provided yourself, data from fraud prevention agencies (see section 7.2.3. for details of which ones we use), and Klarna's own internal information. Klarna continuously develops our fraud models to keep our services secure, and closely investigate how fraudsters operate on different markets (for

example which merchant categories or products are mostly subject to fraud attempts). (Purposes [5, 21 and 41] in section 4).

- decide whether there is a risk of money laundering, if our processing shows that your behaviour indicates money laundering. In relevant cases, Klarna also investigates whether specific customers are listed on sanction lists. (Purposes [20, 29 and 34] in section 4).
- decide whether you are liable for a purchase that you have disputed as "unauthorised" based on
  whether the information you provide, or we have about the purchase, point towards potential
  fraudulent behaviour or not. This by comparing what has happened in your case to other
  transactions indicating fraudulent behaviour. (Purpose [46] in section 4).

See **section 7** for more information about whom we share information with as regards profiling during automated decisions.

If you are not approved under the automated decisions described above, you will not have access to, or will not be able to use Klarna's services, such as our payment methods. Klarna has several safety mechanisms to ensure the decisions are appropriate and fair. These mechanisms include ongoing overviews of our decision models and random sampling in individual cases. If you have any concern about the outcome, you can always contact us, and we will determine whether the procedure was performed appropriately. You can also object in accordance with the following instructions.

#### Your right to object to these automated decisions

You always have the right to object to an automated decision with legal consequences or decisions which can otherwise significantly affect you (together with the relevant profiling) by sending an e-mail message to <a href="mailto:privacy@klarna.co.uk">privacy@klarna.co.uk</a>. A Klarna employee will then review the decision, taking into account any additional information and circumstances that you provide to us.

### 7. Who do we share your personal data with?

When we share your personal data, we ensure that the recipient processes it in accordance with this notice, such as by entering into data transfer agreements or data processor agreements with the recipients. Those agreements include all reasonable contractual, legal, technical and organizational measures to ensure that your information is processed with an adequate level of protection and in accordance with applicable law.

## 7.1 Categories of recipients with whom Klarna will always share your personal information, regardless of the service you use.

#### 7.1.1 Suppliers and subcontractors.

Description of the recipient: Suppliers and subcontractors are companies that only have the right to process the personal data they receive from Klarna on behalf of Klarna, i.e. processors. Examples of such suppliers and subcontractors are software and data storage providers, payment service providers and business consultants, providers of machine learning/artificial intelligence functionality and Klarna Group companies.

Purpose and legal basis: Klarna needs access to services and functionality from other companies where it cannot perform them itself. Klarna has a legitimate interest in being able to access these services and functionality (Article 6(1)(f) UK GDPR). We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose. You are entitled to object to this processing, for reasons connected to the circumstances in your particular case. See **section 2** for more information about your rights.

#### 7.1.2 Klarna Group.

Description of the recipient: Companies in the Klarna Group.

Purpose and legal basis: This is required for Klarna to be able to provide you with its services and functionalities. Klarna has a legitimate interest in being able to access and provide these services and functionalities (Article 6(1)(f) UK GDPR). We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose. You are entitled to object to this processing, for reasons connected to the circumstances in your particular case. See section 2 for more information about your rights.

When you shop in a foreign store (meaning a store located outside of the UK/EEA area) that has an agreement with another company within the Klarna Group, the disclosure of your personal information between Klarna companies is required in order for the two Klarna companies to manage your payment and enable the foreign store to administer your purchase. The legal basis for this processing is the performance of a contract (Article 6 (1)(b) UK GDPR).

The receiving Klarna Group company will handle your personal data in accordance with the privacy notice that applies in your country (see **list**). You can read more about how Klarna safeguards your personal data when transferred outside of the UK/EEA in **Section 8**.

#### 7.1.3 A person who holds a power of attorney for your financial affairs.

Description of the recipient: Klarna may share your personal information with a person who has the right to access it under a power of attorney.

Purpose and legal basis: This processing is carried out to facilitate your contact with us (through agents), and takes place based on your consent (Article 6(1)(a) UK GDPR).

#### 7.1.4 Authorities.

Description of the recipient: Klarna may provide necessary information to authorities such as the police, financial authorities, tax authorities or other authorities and courts of law.

Purpose and legal basis: Personal data is shared with the authority when we are required by law to do so, or in some cases if you have asked us to do so, or if required to manage tax deductions or counter crime. An example of a legal obligation to provide information is when it is necessary to take measures against money laundering and terrorist financing. Depending on the authority and purpose, the legal bases are the obligation to comply with the law (Article 6(1)(c) UK GDPR), to fulfil the agreement with you (Article 6(1)(b) UK GDPR), or Klarna's legitimate interest in protecting itself from crime (Article 6(1)(f) UK GDPR).

There is also a requirement under UK law to withhold tax due on the payments. You will not need to do so, or take any action based on the agreement we have with the UK tax office (the HMRC), as we will disclose the necessary information to the UK tax office to support this agreement. If you have any questions regarding these arrangements, please contact the tax office.

#### 7.1.5 Divestment of business or assets.

Description of the recipient: In the event that Klarna sells business or assets, Klarna may hand over your personal information to a potential buyer of such business or assets. If Klarna or a significant part of Klarna's assets is acquired by a third party, personal information about Klarna's customers may also be shared.

Purpose and legal basis: Klarna has a legitimate interest in being able to perform these transactions (Article 6(1)(f) UK GDPR). We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose. You are entitled to object to this processing, for reasons connected to the circumstances in your particular case. See **section 2** for more information about your rights.

7.2 Categories of recipients with whom Klarna shares your personal information when you use Klarna's payment methods, Klarna at a store, or choose to pay by debit or credit card in Klarna's check-out at a store.

#### 7.2.1 Stores.

Description of the recipient: By stores we mean the stores you visit or shop at (which may include the store's group companies if you have been informed thereof by the store).

Purpose and legal basis: In order for the store to be able to perform and manage your purchase and your relationship with the store or its group companies, e.g. by confirming your identity, sending goods, handling questions and disputes, in order to prevent fraud and, where appropriate, send relevant marketing. The store's privacy notice applies to the processing of your personal data that

has been shared with the store and that the store processes. Normally, you will find a link to the store's privacy notice on the store's website. The legal basis for sharing data with stores is partly the performance of a contract (Article 6(1)(b) UK GDPR) insofar as the data sharing takes place to perform the contract between you and the store, and partly based on Klarna's and the store's legitimate interest (Article 6(1)(f) UK GDPR) or your consent (Article 6(1)(a) UK GDPR). We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose. You are entitled to object to this processing, for reasons connected to the circumstances in your particular case. See section 2 for more information about your rights.

#### 7.2.2 Payment service providers and financial institutions.

Description of the recipient: Payment service providers and financial institutions provide services to you, stores and Klarna to implement and administer electronic payments through a variety of payment methods, such as credit cards and bank-based payment methods such as direct debit and bank transfer.

Purpose and legal basis: Some stores use payment service providers with whom they share your information for managing your payment. This sharing takes place in accordance with the stores' own privacy notices. The store may also let Klarna share your information with the payment service provider they use for processing your payment. Some payment service providers also collect and use your information independently, in accordance with their own privacy notices. This is the case, for example, for electronic wallet suppliers. In addition, Klarna may share your information with other financial institutions when conducting transactions with your account to complete the transactions. Sharing with payment service providers and financial institutions is performed to make a transaction initiated by you and it is done to fulfil the agreement with you (Article 6(1)(b) UK GDPR).

#### 7.2.3 Fraud prevention agencies and companies providing identity checks.

Description of the recipient: Your personal data are shared with fraud prevention agencies and companies that provide identity checks.

Purpose and legal basis: Klarna shares your information to verify your identity, the accuracy of the data you have provided, and to combat fraudulent and criminal activities. The companies with which we work are listed **here**. Please note that these companies process your data in accordance with their own data privacy notices.

Klarna shares your information based on Klarna's legitimate interest in conducting its business (Article 6(1)(f) UK GDPR), as the fraud prevention agencies and the companies providing identity checks have information on fraud activities and identity confirmation which are important for Klarna to use as input to decrease its level of fraudulent transactions. We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose. You are entitled to object to this processing, for reasons

connected to the circumstances in your particular case. See **section 2** for more information about your rights. You can also contact the entities listed in the link above, to exercise the same rights as stated in **section 2** also against those entities.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details in **Section 12** below.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years. We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

#### **7.2.4 Google.**

Description of the recipient: When you use Google Maps at checkout or in the Klarna App (for example, by searching your address in the address bar, viewing "stores near me" or requesting information on nearby deals and offers), your personal information will be shared with Google. Google will process your data in accordance with Google Maps/Google Earths terms of service and privacy policy.

Purpose and legal basis: Klarna shares this information based on Klarna's legitimate interest in conducting its business (Article 6(1)(f) UK GDPR), as Google Maps makes it possible to find the address functionality at checkout and to show maps and deals relevant to your current location in the Klarna App. We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose. You are entitled to object to this processing, for reasons connected to the circumstances in your particular case. See section 2 for more information about your rights.

# 7.3 Categories of recipients with whom Klarna shares your data when you use one of Klarna's payment methods involving the provision of credit or when you use the Klarna card or the One-time Card Shopping Service.

#### 7.3.1 Credit information bureaus.

Description of the recipient: If you apply to use a service from Klarna that involves us providing credit (see section 4.3 on which services from Klarna involve credit), we will share your personal data with credit information bureaus. Sharing does not take place in the event of small amounts or where we already have sufficient information.

Purpose and legal basis: Your personal information is shared with credit bureaus in order to assess your creditworthiness, to confirm your identity and your contact information, and to protect you and other customers from fraud. This data sharing constitutes a credit report.

If you apply to use a credit Service (see Section 4.1 above for a specification of our credit Services), your personal data may be shared with Credit Reference Agencies ("CRAs") to assess your creditworthiness in connection with your application, to confirm your identity and your contact information, and to protect you and other customers from fraud.

For Klarna card, Pay Later in 30 days or Pay in 3 instalments, this sharing constitutes *soft credit searches* (or "soft credit lookups") which does not affect your credit file nor credit score. The search is only visible to you and Klarna. In order to perform these credit searches, Klarna will send the CRAs your name, address, date of birth, phone number, as well as bank account number and sort code if relevant, in order to receive the lookups on you.

However, if you apply for one of our Financing products (fixed term loans or revolving account), *a hard credit search* (or "a hard credit lookup") is performed in addition to soft searches. This is due to our Financing products constituting regulated credit products under UK credit legislation. This hard credit search will be recorded on your credit file and may impact your credit score as follows:

The CRA will keep a record of our enquiry against your name and which may be linked to your representatives ("associated records"). For the purposes of any application for Services from us, you may be assessed with reference to "associated records". Where any search or application is completed, or agreement entered into, involving joint parties, we may record details about this at the CRAs. As a result an "association" will be created that will link your financial records.

Details of which CRA we have used for a specific search are available on request.

In addition, if you open an agreement with one of our Financing products, Klarna Card, Pay Later in 30 Days or Pay in 3 instalments, we will share further information on your agreement with the CRAs. This will occur on a monthly basis until the agreement is closed. This will include details of your outstanding balance, payments made and any default or failure to meet the terms of your agreement. These records will remain on the CRAs' files for 6 years after our agreement with you is settled or terminated, whether settled by you or, if applicable, your business or by way of default. This and other information about you (or, if applicable, your business and those with whom you are linked financially) may be used to make credit decisions about you in the future.

The ways in which CRAs use and share personal data are explained in more detail at; https://www.transunion.co.uk/crain and https://www.experian.co.uk/crain. The CRAs will process your information in accordance with their own privacy notices and you can find out which ones we cooperate with here.

Klarna shares your information based on Klarna's legitimate interest in conducting its business (Article 6(1)(f) UK GDPR), as the credit information bureaus have information on your financial standing which is important for Klarna to use as input to ensure a correct credit assessment, and not grant credit to consumers who is unable to repay it. We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your

information processed for this purpose. You are entitled to object to this processing, for reasons connected to the circumstances in your particular case. See **section 2** for more information about your rights. You can also contact the entities listed in the link above, to exercise the same rights as stated in **section 2** also against those entities.

Klarna retains credit information about you that we have received from a credit information bureaus only in script data format. If you would like to have a readable version, we recommend that you directly contact the credit bureau that informed you that Klarna requested a credit report.

#### 7.3.2 Debt collection companies (for debts that are overdue).

Description of the recipient: Klarna may need to share your information when we sell or outsource collection of unpaid overdue debts through a third party, such as a debt collection company.

Purpose and legal basis: This data is shared to collect your overdue debts. Debt collection companies process personal data in accordance with their own privacy notices, or only on behalf of Klarna in their capacity as Klarna's processors. Debt collection companies may report your unpaid debts to credit information bureaus or authorities, which may affect your creditworthiness and your ability to apply for future credit. This data is shared based on our legitimate interest in collecting and selling debt (Article 6(1)(f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in collecting and selling debts. We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose. You are entitled to object to this processing, for reasons connected to the circumstances in your particular case. See section 2 for more information about your rights.

#### 7.3.3 VISA and digital wallet suppliers.

Description of the recipient: We share information about you and your purchases when you use the Klarna card with VISA and with members of VISA's card network. If you also add the Klarna card to your digital wallet, we may need to share your information with the supplier of that wallet. In such case, data will be processed in accordance with that supplier's privacy notice.

Purpose and legal basis: The sharing takes place to the extent necessary to carry out card transactions, prevent fraud and follow the rules for VISA's card network. If you renew your Klarna card or receive a new card, we will transfer this information to VISA so that VISA can inform third parties with whom you have previously chosen to save your card information (for example, for recurring transactions). Sharing is performed to fulfil the agreement with you (Article 6(1)(b) UK GDPR).

#### 7.3.4 Debt acquirers (for open debts).

Description of the recipient: Klarna can transfer your open debt to debt acquirers.

Purpose and legal basis: Upon transfer of your debt to an acquirer and continuously until you pay off the debt, Klarna will share your contact and identification information (name, date of birth, social security number, address, and phone number), information about your financial standing (such as residual credit, repayments and any negative payment history in relation to the current debt), as well as information about the goods or services associated with the debt. The buyer will process your personal data in accordance with its own privacy notice, which you will receive information about when the debt is transferred.

The sharing of personal data with different acquirers is based on our legitimate interest in selling outstanding debts as part of our business operations (Article 6(1)(f) UK GDPR). We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your personal data processed for this purpose. You are entitled to object to this processing, for reasons connected to the circumstances in your particular case. See section 2 for more information about your rights.

# 7.4 Categories of recipients when using Klarna accounts services (Klarna balance, savings, and payment accounts).

#### 7.4.1 Credit institutions and other financial institutions.

Description of the recipient: We share your information with credit institutions and other financial institutions (such as other banks) when you make transactions or payments to other accounts.

Purpose and legal basis: If you have made payments to a Klarna account, Klarna will process the information we receive from the bank you used for the transaction, such as contact and identification data and payment information. If you make transactions or payments to accounts in other banks, Klarna will also pass on some of your contact and identification data as well as payment information to the recipient and also to the recipient's credit institution or financial institution. Sharing is performed to fulfil the agreement with you (Article 6(1)(b) UK GDPR).

# 7.5 Categories of recipients with whom Klarna shares your personal information when you use Klarna's Shopping Service.

You may find the terms for the Klarna Shopping Service here.

#### 7.5.1 Affiliate Networks.

Description of the recipient: When you choose to click on a sponsored link or make a purchase on a cashback offer in the Klarna mobile application or on our website that links to a store, product or service, you will be redirected to another company's website through a third party, known as an affiliate network. Here you can learn which affiliate networks Klarna cooperates with (presented in the left column). The affiliate networks will process your device information in accordance with their own privacy notices (you will find these privacy notices in the right column in the same link as

referenced above). The store you visit through a sponsored link determines which affiliate network processes your information. Usually a store only cooperates with one affiliate network. You can get more information about which network by contacting us (or the store).

Purpose and legal basis: The affiliate network may place tracking technology on your device that contains information about you clicking on that link in the Klarna mobile application, and which is then used to document your visit to the store to calculate a potential commission due to Klarna.

This processing is based on a balancing of interests (Article 6(1)(f) UK GDPR). When balancing interests, Klarna has determined that we have a legitimate interest in supplying you with sponsored links in order to market shops in the Klarna mobile application and on our website. We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose.

You are entitled to object to this processing, for reasons connected to the circumstances in your particular case. See **section 2** for more information about your rights.

In addition, we need to share information with our affiliate networks to determine your eligibility for cashback under the Klarna Cashback programme. This includes confirming that you have met the specified criteria established in our cashback offers. The data shared also serves to determine the cashback amount potentially due to you. The processing for our cashback service is based on the performance of a contract (Article 6(1)(b) GDPR).

#### 7.5.2 Google.

#### 7.5.2.1 reCAPTCHA

Description of the recipient: When you use the Klarna mobile application (also through our web portal), Google will collect your device information through Google's reCAPTCHA service which is implemented there (in some cases together with additional information that you choose to enter into the reCAPTCHA service), and Klarna will share the phone number used for verification.

Purpose and legal basis: Klarna processes this information based on Klarna's legitimate interest in conducting its business (Article 6(1)(f) UK GDPR), since the reCAPTCHA service prevents misuse of our services (for example by preventing bots from trying to log in, or SMS toll fraud). Google will process this information in accordance with its **terms of service** and **privacy policy**. We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose.

You are entitled to object to this processing, for reasons connected to the circumstances in your particular case. See **section 2** for more information about your rights.

#### 7.5.2.2 Google Maps

Description of the recipient: In order to show where your parcel will be delivered on an integrated map in the Klarna mobile application, we share the relevant delivery address with Google. Google will

process your data in accordance with Google Maps'/Google Earth's **terms of service** and **privacy policy**.

Purpose and legal basis: Klarna shares this information based on Klarna's legitimate interest in conducting its business (Article 6(1)(f) UK GDPR). By using Google Maps we are able to show you the delivery address on an integrated map in the Klarna mobile application. We ensure that this processing is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose. You have the right to object to this processing, for reasons connected to the circumstances in your particular case. See **section 2** for more information about your rights and how to use them.

## 7.5.3 Partners within the framework of the Financial Insights service and the offer and benefit program.

Description of the recipient: Partners within the framework of the Financial Insights service and the offer and benefit program.

Purpose and legal basis: If you choose to take advantage of Klarna's offers and benefits within the framework of the Financial Insights service or the offer and benefits program, Klarna will share the personal information required for you to take advantage of the offer with our business partners (which includes the fact that you are a Klarna customer). Each offer specifies the data that will be shared. Data is shared to perform the agreement between yourself and Klarna (Article 6(1)(b) UK GDPR).

#### 7.5.4 Logistics and transport companies.

Description of the recipient: Logistics and transport companies.

Purpose and legal basis: Klarna will share your personal data with logistics and transport companies that deliver the goods you order if you have signed up for parcel tracking. Examples of information we share are contact and identification data and tracking numbers.

Logistics and transport companies process your data in accordance with their own privacy notices. Sharing is performed to fulfil the agreement between you and Klarna (Article 6(1)(b) UK GDPR).

#### 7.5.5 Advertising services and digital advertising platforms.

Description of the recipient: Third party advertising services and digital advertising platforms.

Purpose and legal basis: Klarna will share your personal data with third party advertising services in order to show you more relevant Klarna advertising on non-Klarna sites and third party digital advertising platforms to show you non-Klarna advertising in the Klarna App and marketing channels. This is based on your interaction with Klarna's products and services and your Klarna profile. Klarna will also share this data to measure the performance of the advertising. Some third

party advertising services and digital advertising platforms will use your data for their own purposes and in accordance with their own privacy policies, available **here**, where you can also see which third parties we use. You can also get more information about this sharing or how to exercise your rights in regards to these companies by contacting us.

This processing is based on your consent (under Article 6(1)(a) UK GDPR). You can revoke your consent at any time in the Tracking Technology settings in the Klarna App. You can also object to this processing - to the same effect as revoking your consent. See section 2 for more information about your rights.

This processing may constitute profiling which aims to customise the marketing based on what we think you may be interested in. You can read more about profiling in section 6.

#### 7.5.6 SIWK third-party apps and services.

Description of the recipient: When you sign in with Klarna (through "SIWK") at a third-party app store or service, Klarna will share your personal data with the third-party app or service.

Purpose and legal basis: Done to fulfil the agreement with you (Article 6(1)(b) UK GDPR).

#### 7.5.7 Fraud prevention agencies and companies providing identity checks.

Description of the recipient: Your personal data are shared with fraud prevention agencies and companies that provide identity checks.

Purpose and legal basis: Klarna shares your information to verify your identity, the accuracy of the data you have provided, and to combat fraudulent and criminal activities. The companies with which we work are listed here. Please note that these companies process your data in accordance with their own data privacy notices.

Klarna shares your information based on Klarna's legitimate interest in conducting its business (Article 6(1)(f) UK GDPR), as the fraud prevention agencies and the companies providing identity checks have information on fraud activities and identity confirmation which are important for Klarna to use as input to decrease its level of fraudulent transactions. We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose. You are entitled to object to this processing, for reasons connected to the circumstances in your particular case. See section 2 for more information about your rights. You can also contact the entities listed in the link above, to exercise the same rights as stated in section 2 also against those entities.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details in Section 12 below.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years. We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

## 7.6 Categories of recipients with which Klarna shares your personal information if you contact our customer service through social media.

#### 7.6.1 Social media.

Description of the recipient: Social media companies such as Facebook, Instagram or Twitter.

Purpose and legal basis: If you contact us via social media such as Facebook, Instagram or Twitter, your personal data will also be collected and processed by these companies, in accordance with their privacy notices. Sharing is performed to fulfil the agreement with you (Article 6(1)(b) UK GDPR).

# 8. When can we transfer your personal data outside of the UK and the EEA, and how do we protect it then?

We always strive to process your personal data within the UK or EEA area. But in certain situations, such as when we share your information within the Klarna Group or with a supplier, subcontractor or store which operates outside the UK/EEA, your personal data may be transferred outside the UK/EEA. Klarna always ensures that the same high level of protection applies to your personal data according to the UK GDPR, even when the data is transferred outside of the UK/EEA. Your rights in respect to your personal data (described in detail in **section 2**), are not affected when data is transferred outside of the UK/EEA. More information about the recipients Klarna shares your data with you can find in **section 7**.

When you shop with a store placed in a country outside of the UK/EEA area, our sharing of your personal data with that store means that your personal data will be transferred to this country outside of the UK/EEA area.

Certain suppliers of Klarna use Binding Corporate Rules ("BCR") when they transfer personal data outside of the UK/EEA area within their own company group. Such BCR have been approved by an EU or UK data protection authority and ensures that the same high level of protection applies to your personal data when it is transferred.

If you want more information about our safety measures you can always contact us. You can find our contact information in **section 12**. You find more information about which countries are deemed to have an "adequate level of protection" on the **European Commission's website**, and you can read

more about the European Commission's standard clauses **here**, and about binding corporate rules ("BCR") **here**. The Information Commissioner's Office has information about data transfers **here**.

#### Safety measures which Klarna uses when transferring personal data outside of the UK/EEA

Countries outside of the UK/EEA may have laws that allow public authorities to request access to personal data stored in the country for the purpose of combating crime or safeguarding national security. Regardless of whether we or any of our providers process your personal data, we will ensure that a high level of protection is guaranteed when transferring that data and that appropriate protection measures have been taken, in accordance with applicable data protection requirements (such as the UK GDPR). Such appropriate safeguards include, but are not limited to, ensuring:

- if the European Commission or UK authority has decided that the country outside of the UK/EEA
  to which your personal data are transferred has an adequate level of protection, which
  corresponds to the level of protection afforded by the UK GDPR. This means for example that the
  personal data is still protected from unauthorized disclosure, and that you may still exercise your
  rights in regards to your personal data, or
- the European Commission's standard clauses (with required UK addendums) have been entered into between Klarna and the recipient of the personal data outside the UK/EEA. This means that the recipient guarantees that the level of protection for your personal data afforded by the UK GDPR still applies, and that your rights are still protected. In these cases, we also assess whether there are laws in the recipient country that affects the protection of your personal data. Where necessary, we take technical and organizational measures so that your data remain protected during the transfer to the relevant country outside the UK/EEA, or
- that the transfer is covered by the EU-US Data Privacy Framework, with the UK extension. This is
  an opt-in certification scheme for US companies, administered by the US Department of
  Commerce. This Privacy Framework includes a set of enforceable principles and requirements
  that must be certified to by the US company, ensuring that your data is still being sufficiently
  protected.

Despite the above, if the store where you choose to shop is located in a country outside the UK/EEA, our data sharing with that store (and with the Klarna entity that store has contracted with) means that your personal data will be transferred to and processed in this country outside the UK/EEA. Click here to access the privacy notices for other Klarna entities in the Klarna Group. Otherwise it would not be possible to administer your purchase. Klarna primarily relies on the European Commission's standard clauses (with required UK addendums) to ensure the protection of your personal data for such data transfers, but as set out above, countries where the foreign store is located may have laws preventing the efficient protection by the standard clauses. Even if this is the case, your personal

data will still be transferred to the foreign store (or the foreign store's local Klarna entity), as long as the data transfer is necessary to administer your specific purchase.

### 9. How long we store your personal data

How long Klarna stores your personal data depends on the purposes for which Klarna uses the personal data:

- Personal data used for the contractual relationship between you and Klarna is generally stored for the duration of the contractual relationship and thereafter for a maximum of up to 10 years based on statutes of limitations rules.
- Personal data that Klarna is under a legal obligation to retain, for example under anti-money laundering laws or bookkeeping laws, is generally retained for 5 and 7 years respectively.
- We process the recordings of telephone conversations for a time period of 90 days for quality
  assurance purposes. We will also retain recordings of inbound and outbound calls for up to three
  years, as well as Klarna employees' notations from these calls for up to six years, in order to
  document what has been discussed and decided on the call.
- Personal data which is not used for the purposes of your contractual relationship with Klarna or where Klarna does not have a legal obligation to retain the data is only retained as long as necessary to fulfil the respective purpose for our data processing (usually 3 months). More information can be found in the table in section 4.

In some limited cases, the personal data may need to be stored for a longer period because of capital adequacy laws which Klarna has to comply with.

The legal obligations referred to above means that Klarna cannot delete your personal data, even if you request us to delete it, as described in **section 2**. If we don't have a legal obligation to retain the personal data, we instead have to make an assessment if we may require the personal data in order to protect Klarna from legal claims.

Please note that just because we have a legal obligation to store your personal data, this does not mean that we are also permitted to use this data for any other purpose. Klarna will make an assessment for each specific purpose of how long we may use your personal data. You can read more about this in section 4.

# 10. How we use cookies and other types of tracking technology

To provide a tailored and smoooth experience, Klarna uses cookies and similar tracking technologies in our multiple interfaces, such as our website, the Klarna mobile application and at the checkout of a store that uses Klarna. You can find information about the tracking technology that Klarna uses, and information about how you accept or decline the tracking technology, in each interface.

### 11. Updates to this Privacy Notice

We are constantly working to improve our services so that you have a smoooth user experience. This may involve modifications of existing and future services. If that improvement requires a notice or consent in accordance with applicable law, you will be notified or given the opportunity to give your consent. It is also important that you read this privacy notice every time you use any of our services, as the processing of your personal data may differ from your previous use of the service in question.

### 12. Klarna contact information

Klarna Bank AB and Klarna Financial Services UK Limited, 10 York Road, London SE1 7ND, United Kingdom.

Klarna has a data protection officer and a team of data protection specialists. We also have a number of customer service teams that handle data protection issues. You can reach all of these individuals at <a href="mailto:privacy@klarna.co.uk">privacy@klarna.co.uk</a>. If you specifically wish to contact Klarna's data protection officer, enter this on the subject line.

Klarna complies withapplicable data protection laws. Please visit www.klarna.com/uk/ for more information about Klarna.

### 13. Acquisition of Close Brothers Retail Finance

In January 2019, Klarna acquired the Retail Finance division of Close Brothers Limited. In relation to this acquisition, Klarna acquired the personal data of customers who use or have used the services of the Retail Finance division. Klarna will process this personal data in order to fulfill contractual

obligations, comply with applicable laws, and in line with Klarna's legitimate interest to conduct its business.

The personal data acquired will be processed in line with the privacy notice, in force at the time of the acquisition, and in line with applicable data protection laws. Please note that you have the rights stipulated in this Privacy Notice also for this data, for example the right to access (See Section 13). The privacy notice, in force at the time of the acquisition, may be found here.