

# 1. Introduction

This Privacy Policy describes how Invoier AB (“we”, “us”, “our” or “the Company”) collects, uses, shares and protects personal data when you use our website and platform or otherwise interact with us.

We respect your privacy and duly protect the personal data we process about you. All processing of personal data is carried out in accordance with the requirements set out in the general data protection regulation ("GDPR") and other applicable personal data protection legislation supplementing the GDPR. We may at our own discretion update this privacy notice at any given time (see at the end the date this notice was last updated). If material changes are made, we will provide notice on this website prior to the change becoming effective.

We operate a factoring marketplace platform where businesses may sell invoices and investors may purchase invoices via the platform. In this context, we process personal data relating to representatives of sellers, buyers, partners, website visitors and other individuals.

## 2. What is personal data?

Personal data is any kind of information that can be linked to a living person.

Personal data is any kind of information that can be linked to a living person. This might for example be your name, address and personal identity number. Photos of people are also classified as personal data. A corporate identity number is not personal data but may be in the case of a one-person company.

There is a difference between general personal data and sensitive personal data.

## 3. Who Is Responsible for Your Personal Data?

### **Data Controller:**

Invoier AB

Registration number 559146-3327

Box 2094, 103 13 Stockholm

Email: [support@invoier.com](mailto:support@invoier.com)

## 4. Who This Policy Applies To?

This Privacy Policy applies to personal data processed in relation to:

- Visitors to our website
- Representatives of companies selling invoices on the platform
- Representatives of companies or investors purchasing invoices
- Business contacts and partners
- Individuals contacting us (e.g. support, sales, marketing)
- Job applicants (if applicable)

Depending on your relationship with us, the categories of personal data and purposes of processing may vary.

## 5. How We Collect Personal Data

We collect personal data through:

- Information you provide directly to us (e.g. registration, forms, email correspondence)
- Use of our website and platform (e.g. cookies, log data)
- Information provided by the company you represent
- Publicly available sources (e.g. company registers)
- Third parties (e.g. KYC, AML, payment or identity verification providers)

## 6. Categories of Personal Data we Process

Depending on the context, we may process:

- **Identification data:** name, title, date of birth, copies of identity documents such as passport or driver's license and information collected through Mobile BankID for the purpose of identifying the customer
- **Contact data:** email address, phone number, business address
- **Company and organizational data:** company name, registration number, role and representation capacity

- **Financial and transaction-related data:** invoice data, bank account details (where applicable)
- **Account and transaction data (account analysis):** Payment account data and transaction information collected in a logged-in environment as part of the provision of our services (account analysis)
- **Compliance and due diligence data:** information required for know-your-customer (KYC) procedures and measures to prevent and detect money laundering and terrorist financing, including sanctions screening, politically exposed person (PEP) information, tax residency of company representatives
- **Technical data:** IP address, device information, cookies
- **Communication data:** emails, messages, support requests

## 7. When do we process personal data?

### **Customer relationships – Entering into and performing agreements**

We process your personal data in connection with the entering into of agreements in order to be able to provide our services. The purpose of this processing is the administration of the customer relationship. We collect personal data that you provide directly to us. As a new customer, we may for example request personal data such as name, personal identity number, email address and telephone number.

In addition to processing personal data for the performance of an agreement or to take measures prior to entering into an agreement, we also process personal data in order to fulfill obligations incumbent upon us under applicable laws, other statutes or decisions by authorities. Examples of processing carried out due to legal obligations include measures to prevent and detect money laundering and terrorist financing, sanctions screening and compliance with accounting legislation.

We also obtain information from external parties such as credit reference agencies, information providers and authorities. Certain processing activities within this area are carried out on the basis of our legitimate interest, including transaction monitoring for the purpose of detecting fraud or assessing whether a person exceeds the Company's risk tolerance with regard to sanctions. This also includes the detection of unusual patterns in a customer's behavior or equipment in order to prevent fraud.

We provide account analysis as an integral part of our services. Account analysis involves the collection and analysis of payment account data and transaction information and is carried out in a logged-in environment.

The purpose of the account analysis is to prevent and detect fraud, money laundering and terrorist financing, to confirm ownership and legitimacy of payment accounts used in connection with our services, and to assess relevant risk indicators related to the customer relationship. Where applicable, the results of the account analysis may also be used to adapt and improve our services.

The legal basis for this processing is the performance of a contract or the taking of steps at the request of the customer prior to entering into a contract, in accordance with Article 6(1)(b) of the GDPR. The provision of our services requires this processing.

Furthermore, personal data is processed for the maintenance and improvement of the security of our IT systems. This includes, among other things, protecting against various threats and ensuring the integrity of our digital infrastructure.

The legal basis for the processing of personal data is the performance of a customer agreement, compliance with legal obligations, or our legitimate interests as described above.

### **In connection with factoring or collections**

In connection with the mediation of invoice purchases or collection measures, we need to obtain information about the debtor who is to pay the invoice. Debtors are companies, and we therefore need to obtain information about the person representing the company. The collection of personal data about the debtor primarily comes from the invoice that has been transferred via us, through contact with the invoice recipient or our customer and/or in connection with the administration of the invoice. We also obtain personal data about the debtor from external parties such as credit reference agencies or information providers. In connection with invoice purchases, automated decision-making occurs, based on the information obtained. The legal basis for processing personal data in this case is

our legitimate interest in assessing an invoice debtor's ability to pay, together with the public interest in debt collection measures.

### **Visits to the website**

We process personal data when you visit our website in order to administer and improve the website, for our internal records and for statistical analysis. We collect your IP address and browser user agent string to help with spam detection. The processing is necessary to satisfy our legitimate interest in ensuring that our website is continuously maintained, updated and protected against malicious attacks.

When we receive your consent, we use tracking functions (cookies) on our website for remarketing purposes.

### **Marketing**

We process personal data about you in connection with the marketing of our services. When we process personal data for direct marketing purposes, we may collect data from external parties via information providers as well as via cookies on our website. The purpose of the processing is to enable us to contact you as a business operator or the legal entity you represent in order to contact you via telephone calls, SMS, email, regular mail or other digital channels such as social media. The processing is necessary to satisfy our legitimate interest in marketing our services, and is based on consent where digital direct marketing is used.

If you do not want us to process your data, you can always contact us and notify us of this. If you request that the processing of personal data for this purpose cease, we will comply with this and delete the data for that purpose.

### **Job Candidates**

We process personal data about you when you submit an expression of interest or a job application to us. We collect your personal data from you directly, which you provide to us when applying for one of our positions, such as your CV and personal letter, from publicly available sources, for example when we conduct background checks, and from external recruiters who have been involved in the recruitment process and who have provided information about you to us.

The processing of your personal data is necessary to satisfy our legitimate interest in

carrying out the recruitment process in order to ensure that we hire the most suitable candidates.

## 8. To whom do we disclose your personal data?

We disclose your personal data to:

**Authorities:** We disclose personal data to authorities to the extent that we are under a legal obligation to do so. This may for example include tax authorities, law enforcement authorities and supervisory authorities.

**Suppliers:** We have entered into agreements with selected suppliers, and these agreements include provisions on the processing of personal data on our behalf. The suppliers operate, for example, within development, debt collection, maintenance, operation and support of IT systems. We ensure that our suppliers who process personal data on our behalf, so-called data processors, only process personal data in accordance with our instructions. Personal data processed by data processors shall be processed securely and in accordance with applicable regulations, and to achieve this we take appropriate measures.

**Counterparties on the platform (buyers and sellers):** We disclose personal data to buyers and sellers on the platform where such disclosure is necessary for the conclusion and performance of agreements between sellers and buyers of invoices. Sellers and buyers enter into agreements with each other via the platform, and in this context it may be necessary to share certain personal data relating to representatives of the respective parties. Such disclosure is based on the performance of a contract and is limited to the personal data necessary for the relevant transaction and contractual relationship.

## 9. Storage period

We store your personal data for as long as it is needed for the purposes for which it was collected and processed, or for as long as required by applicable laws and other regulations.

This means that we store your personal data for as long as it is necessary to perform an agreement and for as long as required in accordance with applicable minimum retention requirements under laws and other regulations. In cases where we store your personal data for purposes other than the performance of an agreement, for example for combating money laundering, we retain the personal data only if it is necessary and/or required by law or other regulation for the purpose in question.

Preventing and detecting money laundering, terrorist financing and fraud: we retain know-your-customer due diligence information for at least five years after the business relationship has ended or a single transaction has been completed.

As a rule, Invoier stores customer data for 10 years after the end of the customer relationship for the purpose of establishing, asserting and defending legal claims, handling debt recovery/collection claims and in order to be able to fulfill its legal obligations at the request of authorities. However, the retention period for personal data in a specific case depends on the purpose of the processing.

If you have applied to become a customer but are not approved, we generally store your personal data for a maximum of one year after the decision. However, the data may be stored for a longer period if required by law, for example to prevent money laundering and terrorist financing.

Personal data may be processed for marketing purposes and is deleted after one year if the potential customer has been contacted and has not shown any interest in our services or requests that the data be deleted. In cases where a potential customer has shown interest and this has led to a customer meeting and has consented to receiving further information from us or marketing, personal data is processed until the interest in our services has ceased or the customer requests that the data be deleted.

In cases where a job application does not match any available position with us, you who have submitted an expression of interest/job application will be informed of this and personal data will be deleted after one year.

Deletion of collected data regarding your use of our websites is carried out in accordance with our Cookie Policy.

## 10. How do we protect your personal data?

Storing your personal data in a safe and secure manner is a central part of how we conduct our business. We have implemented appropriate technical, organizational and administrative security measures to protect the data we hold against loss, misuse, unauthorized access, disclosure, alteration and destruction.

## 11. What data protection rights do you have?

You have the following rights regarding the personal data we process about you:

### **Right to request access to your personal data**

You have the right to access the personal data we hold about you. However, your right of access may be restricted by law or other regulation, the protection of another person's privacy and considerations relating to the protection of our business concepts and business routines. With regard to our expertise and trade secrets, as well as internal assessments and documentation, your right of access may be limited.

### **Right to request rectification of incorrect or incomplete personal data**

If the personal data we hold about you is incorrect or incomplete, you have the right to request rectification of the data, subject to the limitations stipulated by law or other regulation.

### **Right to request erasure**

You have the right to request that your personal data be erased if:

- you withdraw your consent to the processing and there is no other legitimate ground for the processing
- you object to the processing and there is no legitimate ground for continued processing
- you object to processing for direct marketing

- the processing is unlawful

As a result of legislation applicable to the financial sector, we are in many cases obliged to retain personal data about you during the period you are a customer with us, and also thereafter, for example in order to fulfill a legal obligation or handle legal claims.

### **Right to restriction of processing of personal data**

If you dispute the accuracy of the personal data we have registered about you or the lawfulness of the processing of such data, or if you have exercised your right to object to the processing of personal data, you may request that we restrict the processing of such data. The processing will then be limited to storage only until the personal data has been rectified or until it can be established that our legitimate interests take precedence over your interests.

If you are entitled to erasure of the personal data we have registered about you, but at the same time need the data in order to assert a legal claim, you may request that Invoier restrict the processing to storage only, so that the data remains.

Even in cases where the processing of your personal data has been restricted as described above, Invoier may process your personal data in other ways if required in order to assert a legal claim or if you have given your consent to such processing.

### **Right to object to processing based on Invoier's legitimate interest**

You may always object to the processing of your personal data where the processing is based on Invoier's legitimate interest, including when the processing relates to direct marketing and profiling in connection with such marketing.

### **Right to withdraw consent**

If your consent constitutes the legal basis for a certain type of processing, you have the right to withdraw your consent at any time. You will be informed of your right to withdraw consent in connection with us requesting it.

## **Right to data portability**

You have the right to receive the personal data that you have provided to us in a machine-readable format. This applies only to personal data that is processed by automated means and where the legal basis is consent or the performance of an agreement. Where it is safe and technically possible, we may also transfer the personal data to another data controller.

Your request to exercise your rights as described above is assessed on a case-by-case basis based on the prevailing circumstances. Please note that we may also retain and use your data if necessary to comply with legal obligations, assert a legal claim or enforce our agreements.

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