

MAKSEKESKUS AS

PRIVACY POLICY

This Privacy Policy describes the general principles and values that Maksekeskus AS adheres to when processing personal data. We respect everyone's right to the protection of their personal data and we take the protection of personal data very seriously.

1. About us

Maksekeskus AS (**'Maksekeskus'**, **'We'**, **'Us'** or **'Our'**) offers various payment solutions to e-merchants. Our goal is to provide a convenient and innovative service that allows e-merchants to save time and money through automated payment systems, and to make the purchasing process more comfortable and effective for customers.

We are a subsidiary of Eesti Post AS. We hold an activity licence of a payment institution and We are supervised by the Financial Supervision Authority.

2. Personal Data, processing of Personal Data

We process personal data as part of our day-to-day economic activities. Depending on the specific relationship, We may be the processor or the controller of the personal data.

As the processor, We receive personal data from our contractual partners, primarily e-merchants. As the controller, We receive personal data directly from the data subject (**'You'** or **'Your'**).

The controller determines the purposes and means of processing of personal data.

If We process personal data as the controller, then We shall inform You in our [Privacy Notice](#) of the purposes of processing Your personal data, Your rights, Our obligations and responsibilities relating to the processing of personal data.

If We process personal data as the processor, then We shall follow the written guidelines provided by the controller.

3. Principles of Personal Data processing

We respect each individual's right to the protection of their personal data and We shall do Our best to ensure that personal data provided to and collected by Us shall remain protected and confidential.

We process personal data lawfully, i.e. We always have a legal basis for processing personal data.

We determine clear purposes for the processing of personal data, We make these known in an appropriate manner prior to processing, and We process personal data for these purposes only.

We only collect and process personal data that are relevant to the purpose of processing.

We implement various measures (physical, technical, organisational) to protect personal data from illegal or unauthorised destruction, loss, alteration, disclosure of, acquisition or unauthorised access to them.

If We process personal data on the basis of the individual's consent, the request for consent shall be clearly distinguishable, intelligible and worded clearly. We shall notify and We acknowledge that a consent can always be withdrawn.

We assess the risks associated with personal data processing regularly and We take appropriate mitigation measures to alleviate risks.

In accordance with legislative requirements We may be required to disclose or give authorities or supervisory authorities access to personal data.

We may transfer personal data to Our processors, if this is necessary for the purposes for which they are processed.

We require, and We expect Our contractual partners to be careful when processing personal data, to prevent the unauthorised disclosure or inappropriate use of personal data and to process personal data in an honest and lawful manner.

We only store personal data for as long as required by law or contracts or necessary for Our business activities. At the end of the storing period We shall delete the personal data permanently.

Compliance with the requirements set out in the Privacy Policy is integral to Our day-to-day activities, services and processes, and Our development.

We have internal regulations ('**Internal Regulations**') to ensure compliance with the requirements set out in the Privacy Policy. We understand that compliance with the Internal Regulations happens via Our employees. Therefore, We consider it important and We are committed to ensuring that Our employees are aware of and comply with the requirements of the Internal Regulations. We expect all of Our employees to respect privacy requirements.

4. Cookies

We use session cookies and persistent cookies on Our website. Cookies are small data files that Our website stores on Your smart device when You visit Our website.

Session cookies are generated for the duration of Your visit to Our website (i.e. until Our website's session is active). We do not store session cookies.

Persistent cookies are generated when You choose to use the option of saving Your personal data in the Simple Checkout Solution on Our website. We use persistent cookies

to provide You with the Simple Checkout Solution and to make e-shopping on the websites of Your chosen merchants more convenient.

5. Your rights

You have control over Your personal data and consequently You have rights, which include a right of access to Your personal data, a right to request Us to rectify personal data, a right to be forgotten, a right to restriction of processing of personal data, a right to personal data portability and a right to withdraw consent given to personal data processing.

You have a right to contact Maksekeskus in relation to the aforementioned rights (clause 6).

You have a right to lodge a complaint with the Estonian Data Protection Inspectorate in connection with Our activities relating to the processing of personal data (www.aki.ee).

6. Our contact details

The contact details of Maksekeskus can be found on the website <https://maksekeskus.ee/kontakt/>.

The e-mail address of Our Data Protection Officer is support@maksekeskus.ee.

7. Updating the Privacy Policy

We may update the Privacy Policy from time to time. The currently valid Privacy Policy can be accessed on Our website.