



Privacy Notice NOTYD

NOTYD B.V.

Last updated: August 2023

1 Who are we and what do we offer?

We are NOTYD B.V. (**NOTYD, us and we**). We understand your privacy is important. That is why we are committed to protecting your Personal Data. In this Privacy Notice we explain what kind of Personal Data we collect. We also explain what role we have in the processing of Personal Data, how long we retain them and what rights you have as a data subject.

We offer an online payment method for *business-to-business* customers (the **Payment Services**). For more information, you can visit our **Website**: www.notyd.com. The provision of the Website and services related thereto (e.g. social media) are collectively referred to as the **Related Services**.

2 Personal Data and the Privacy Legislation

We process **Personal Data**. Personal Data means all information by which a person can be directly or indirectly identified. Under the General Data Protection Regulation (**GDPR**) and other relevant legislation on the protection of Personal Data (collectively referred to as the **Privacy Legislation**), we are the so-called **Controller** of your Personal Data. If you have questions about the processing of your Personal Data, you can always contact us through the contact details listed at the bottom of this Privacy Notice.

3 What Personal Data do we collect as Controller?

NOTYD processes Personal Data in various contexts. We may process your Personal Data if you use our Payment Services as a representative of our **Sellers** or our **Buyers**, if you use our Related Services as our **User** (e.g. our website or social media pages), or if you apply for a job at NOTYD as our **Applicant**. We may also process your Personal Data if you are a representative of our **Suppliers** and we utilise your company's services.

If you are a representative of one of our **Sellers** (meaning: if you work at a Seller), we process the following Personal Data:

Personal Data:	Purpose:	Legal basis:
<p><i>Contact information:</i></p> <p>(Company) name, email address, phone number, and order history of Seller with NOTYD.</p> <p><i>Portal information:</i></p> <p>Login credentials, overview of transactions, orders and open payment requests, contact information of Buyers and an overview of users with access to Sellers Portal.</p>	<p><i>We may use this information to:</i></p> <ul style="list-style-type: none"> - provide you with access to your account and our Payment Services to our Buyers and Sellers; and - be able to contact and support you regarding the use of our Payment Services. 	<p>We may process these Personal Data, because this is necessary to perform our contract with the Seller you represent.</p> <p>We may also process these Personal Data, because we have a legitimate interest to (i) assist you in using the Payment Services and (ii) improve our Payment Services and Related Services.</p>
<p><i>Compliance information:</i></p> <p>Information on identification documents of UBO's (passport, ID or driving licence) such as name, date of birth and social security number.</p>	<p><i>We may use this information to:</i></p> <ul style="list-style-type: none"> - verify your identity; and - perform a customer due diligence risk assessment. 	<p>We may process these Personal Data, because we are legally obliged to perform a KYC/KYB check based on the Dutch Money Laundering and Terrorist Financing Prevention Act (<i>Wwft</i>).</p> <p>We may also process these Personal Data, because we have a legitimate interest to check whether you or the Seller may use our Payment Services.</p>
<p><i>Finance information:</i></p>	<p><i>We may use this information to:</i></p>	<p>We may process these Personal Data, because this is necessary to perform</p>

(Company) name, email address, bank details (account number, IBAN and SWIFT/BIC-code) and VAT number (only personal data if referenced to individual or one-person business).	<ul style="list-style-type: none"> - handle, check, process and administer payments; and - include in our administration, i.a. on behalf of the tax authorities. 	<p>our contract with the Seller you represent.</p> <p>We are also legally obliged to process (some of) these Personal Data for the tax authorities.</p>
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If you are a representative of one of our **Buyers** (meaning: if you work at a Buyer), we process the following Personal Data:

Personal Data:	Purpose:	Legal basis:
<p><i>Contact information:</i></p> <p>(Company) name, email address, phone number, order history of Buyer with NOTYD and customer support history.</p>	<p><i>We may use this information to:</i></p> <ul style="list-style-type: none"> - provide our Payment Services to our Buyers; - be able to contact and support you regarding the use of our Payment Services; and - performance of the contract with the relevant Seller(s) 	<p>We may process these Personal Data, because this is necessary to perform our contract with the Buyer you represent.</p> <p>We may also process these Personal Data, because we have a legitimate interest to (i) assist you in using the Payment Services, (ii) improve our Payment Services and Related Services and (iii) perform our contract with the relevant Seller(s).</p>
<p><i>Compliance information:</i></p> <p>Full name, email address, phone number, gender, birth date, home address, bank account number, type of bank account, balance and currency, nickname of accounts, transaction history, company name, registration number at NOTYD, VAT number, account report (credit score, limits, directors/shareholders), network information, device type, device settings (such as, time and date of the purchase and location of the purchase (IP address)).</p>	<p><i>We may use this information to:</i></p> <ul style="list-style-type: none"> - verify your identity; and - perform a client risk and creditworthiness assessment. 	<p>We may process these Personal Data, because we are legally obliged to investigate if you are creditworthy based on the <i>Debt Rescheduling Natural Persons Act</i>, and to prevent fraud and money laundering based on the Dutch Money Laundering and Terrorist Financing Prevention Act (<i>Wwft</i>).</p> <p>We may also process part of these Personal Data, because we have a legitimate interest to check whether the Buyer you represent is creditworthy enough to use our Payment Services.</p>
<p><i>Finance information:</i></p> <p>(Company) name, email address, phone number, bank details (account number, IBAN and SWIFT/BIC-code), device location for Twilio email services (only personal data if referenced to individual or one-person business).</p>	<p><i>We may use this information to:</i></p> <ul style="list-style-type: none"> - handle, check, process and administer payments; and - include in our administration, i.a. on behalf of the tax authorities. 	<p>We may process these Personal Data, because this is necessary to perform our contract with the Buyer you represent.</p> <p>We are also legally obliged to process (some of) these Personal Data for the tax authorities.</p>
<p><i>Transaction information accessible in Sellers' Portal</i></p> <p>Contact information on (representative of) Buyer (such as name, (shipping) address).</p>	<p><i>We may use this information to:</i></p> <ul style="list-style-type: none"> - provide our Payment Services to the relevant Seller(s). 	<p>We may process these Personal Data, because we have a legitimate interest to perform our contract with the relevant Seller(s).</p>

Purchase information (such as time and date, type of product/service, payment amount), purchase overview and open payment requests from Seller (only personal data if referenced to individual or one-person business).		
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If you are our **User**, we process the following Personal Data:

Personal Data:	Purpose:	Legal basis:
<p><i>When you contact us:</i></p> <ul style="list-style-type: none"> - <u>Via our contact form</u>: full name, company name, phone number, work email address and other Personal Data you share with us in your message. - <u>Via phone/email</u>: your email address or phone number and other Personal Data you share with us in your message. 	<p><i>We use this information to:</i></p> <ul style="list-style-type: none"> - answer your questions and/or handle any requests; - support you in using our Payment Services or Related Services; and - improve our Payment Services and Related Services as a result of questions and feedback from you. 	<p>We may process these Personal Data, because we have a legitimate interest to (i) contact and assist you based on your comment or question and (ii) improve our Payment Services and Related Services as a result of the questions and feedback we receive.</p>
<p><i>When you use our Website:</i></p> <p>IP-address, account ID, Google Analytics ID, type of internet browser, device type, location data, visited pages, how you got to our Website, time and length of your Website visit and language preference.</p>	<p><i>We use this information to:</i></p> <ul style="list-style-type: none"> - enable you to use our Website; - improve the usability of our Website; and - provide you with advertisements. 	<p>We may process these Personal Data because we have a legitimate interest to provide you with a good functioning Website.</p> <p>For the purposes of advertising and improving our Payment Services and Related Services, we may process these Personal Data based on your consent.</p>
<p><i>When you sign up for receiving marketing messages:</i></p> <p>Full name, e-mail address, company name, phone number, postal address, VAT number, bank account number, chamber of commerce number, username, login credentials, profile information included in your NOTYD account.</p>	<p><i>We use this information to:</i></p> <ul style="list-style-type: none"> - send you our newsletter or other marketing messages. 	<p>We may process these Personal Data because you have given us consent to do so, i.e. by signing up for our newsletter.</p> <p>If you have previously paid for our Payment Services, we may process these Personal Data because we have a legitimate interest to do so.</p> <p>In every newsletter there is a link via which you can unsubscribe.</p>
<p><i>Via our social media pages:</i></p> <p>Information of visitors who leave a comment or otherwise post something on our social media pages, including the personal data within these comments and/or posts.</p>	<p><i>We use this information to:</i></p> <ul style="list-style-type: none"> - contact the visitors in reply of their post and/or comment via our social media pages; and - process the feedback left on our social media pages. 	<p>We may process these Personal Data, because we have a legitimate interest to process these data and because the visitors voluntarily made such information public.</p> <p>Our social media pages are also controlled by the social medium itself. Please check</p>

		its own privacy policy, to see how the social medium handles Personal Data: <u>Linkedin Privacy Notice</u>
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If you are our **Applicant**, we process the following Personal Data:

Personal Data:	Purpose:	Legal basis:
<i>Contact details:</i> Full name, email address, home address and phone number.	<i>We use this information to:</i> - contact you about the application.	We may process these Personal Data, because we have a legitimate interest to get (and keep) in touch with you about your application.
<i>Application information:</i> Information provided by you, such as Personal Data included in the curriculum vitae (including your nationality), motivation letter, references and diplomas.	<i>We use this information to:</i> - assess whether you are a match for the job at NOTYD.	We may process these Personal Data, because we have a legitimate interest to review your application.
<i>Information retained during application process:</i> Notes from interviews.	<i>We use this information to:</i> - assess whether you are a match for the job at NOTYD.	We may process these Personal Data, because we have a legitimate interest to review your job interview as part of your application.
<i>Information from public sources:</i> Information in public profiles, such as LinkedIn and other social media platforms (where applicable).	<i>We use this information to:</i> - assess whether you are a match for the job at NOTYD.	We may process these Personal Data, because we have a legitimate interest to review the application. We only process information that is relevant for the application and the Applicant gets the opportunity to react to our findings.

If you are a representative of our **Suppliers (meaning: if you work at a Supplier)**, we process the following Personal Data:

Personal Data:	Purpose:	Legal basis:
<i>Contact information:</i> (Company) name, email address, phone number and contracting history with NOTYD.	<i>We use this information to:</i> - perform the contract we have with the Supplier you represent; and - be able to contact you about the services used under the contract.	We may process these Personal Data, because this is necessary to perform our contract with the Supplier you represent. We may also process these Personal Data, because we have a legitimate interest to contact you in relation to the Supplier business.
<i>Finance information:</i>	<i>We use this information to:</i>	We may process these Personal Data, because this

(Company) name, email address, bank details (account number, IBAN and SWIFT/BIC-code), and VAT number.	<ul style="list-style-type: none"> - handle, check, process and administer payments; and - include in our administration, i.a. on behalf of the tax authorities. 	<p>is necessary to perform our contract with the Supplier you represent.</p> <p>We are also legally obliged to process (some of) these Personal Data for the tax authorities.</p>
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4 Mandatory information

When you or your employer engage our Payment Services, it may be (e.g. legally or contractually) required that you provide us with certain Personal Data. For example, information regarding our Know Your Customer process. Where you do not provide us with such information, this will usually imply that we will not be able to provide our Payment Services or perform part of our agreement.

5 Automated decision-making

5.1 We use automated decision-making for credit underwriting: a process by which NOTYD decides to accept the risk of giving credit and providing its Payment Services. When choosing our payment method, we use your Personal Data in clustering algorithms in order to:

- decide if we can offer our Payment Services to the Buyer you represent. This automated financial assessment is necessary for our legitimate interest to know whether we can extend credit.
- make a risk analysis regarding fraud and money laundering. This automated risk assessment is necessary for our legitimate interest to prevent our Payment Services from being misused for fraud or money laundering.

5.2 If you disagree with the automated decision and this automated decision-making is based on your personal data and produces legal effects on you or similarly significantly affects you, you can always reach out to us and request review of the automated decision by a NOTYD employee. Additionally you can object to the outcome of the automated financial or risk assessment (which will result in an employee review of the decision) via legal@notyd.com.

6 How long do we keep the Personal Data?

It is our policy to store and process only those Personal Data that are essential to provide you with the best possible service.

We will not process or store any Personal Data that we do not need. We store Personal Data for as long as we need it for the above purposes, unless we are legally obliged to retain the Personal Data for a longer period. In this respect, we apply the following retention periods:

- **Contact information** | These data is stored for **5 years** after the end of our contractual relationship with a Seller, Buyer or Supplier.
- **Compliance information** | Personal Data of the Seller will be stored for **5 years** after the end of the contractual relationship with the Seller. Personal Data of the Buyer will be stored for **90 days** after the purchase. If the Buyer's transactions are suspected of fraud and money laundering, these Buyer's Personal Data will be stored for **5 years**.
- **Finance information** | These Personal Data is stored for **7 years** after the end of the contractual relationship with the Seller, Buyer or Supplier, unless we are legally obliged to retain the Personal Data for a longer period.
- **Portal information** | These Personal Data is stored for **1 year** after the end of the contractual relationship with the Seller.
- **Correspondence information** | These Personal Data is stored as long as necessary to handle your message/question/complaint and for a period of **5 years** thereafter.
- **Sending newsletters** | We will store your data as long as you have subscribed to our newsletter.

- **Applicant information** | These Personal Data is stored for a maximum of **1 year** after the application process (e.g. in order to include you in our talent pool), if we have your consent. If we do not have your consent, these Personal Data is stored for a maximum of **4 weeks** after the application process.
- **Other information** | We store other Personal Data only for as long as it is necessary for the purposes. This is deleted as soon as it is no longer necessary for the purposes for which we processed it.

Personal Data we process may be accessed, processed and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

7 Do we share your Personal Data with others?

Processors

We use third parties (**Processors**) who support us in providing our Payment Services and Related Services. Within this context these Processors receive Personal Data from us which they process on our behalf. For instance, we use Processors for building and maintaining our Website, sending our newsletters and hosting our data.

These Processors may only use or disclose the data collected and processed by us within the scope of our instructions to them and under no circumstances for other purposes. We enter into a data processing agreement with all of our Processors.

External Controllers

In addition, some of the Personal Data may be processed by other controllers (**External Controllers**). We share our information with:

- the tax authority, because we are legally obliged to do so;
- Creditsafe Nederland B.V. and Schufa Holding AG to perform our fraud and credit worthiness checks; and
- Gen25 B.V. for managing our customer and supplier relations.

Any Personal Data provided to these External Controllers will be processed in accordance with their own privacy policies.

Apart from the above, we will not share your Personal Data with third parties, unless we are legally obliged to do so.

8 Export of Personal Data outside the European Union

We may transmit Personal Data to parties outside the European Union, if one of the Processors or Controllers is established outside the European Union. The Personal Data will only be transferred to countries and/or parties that provide an adequate level of protection in accordance with the European standards. You may contact us if you wish to receive more information or a copy of the safeguards we take in this scope where necessary.

9 Links to other websites

You can find (hyper)links in our Related Services which link to the websites of partners, providers, advertisers, sponsors, licensors or any other third parties. We have no control of the content or the links which appear on these websites and we are not responsible for the practices of websites linked to. Furthermore, these websites, including their content and links, may constantly change. These websites may have their own privacy policies, user conditions and customer policies. Browsing and interaction on any other website, including websites linked to, are subject to the terms and conditions of such website.

10 Changes of the Privacy Notice

The Privacy Notice may be changed from time to time. Please check our Privacy Notice frequently and take note of any changes. The new Privacy Notice will be effective immediately upon posting on

our Website. If we change our Privacy Notice significantly, then we will state so on our Website together with the revised Privacy Notice and send you an email.

11 Your rights as a data subject and our contact data

You have the right to...



Access

... obtain confirmation as to whether or not your personal data are being processed by us, and, if that is the case, access to the (categories of) personal data and information about our processing activities and a copy of your personal data.



Restriction of processing

... obtain restriction of processing of your personal data under certain circumstances. In such case, we may still store your personal data, but our use of your personal data for certain purposes will be restricted.



Rectification

... obtain rectification of any inaccurate personal data concerning you. You also have right to have incomplete personal data concerning you completed.



Data portability

... receive the personal data you have provided to us in a structured, commonly used and machine-readable format and to transmit those data to another controller or have us do that for you under certain circumstances.



Erasure

... obtain the erasure of your personal data under certain circumstances, for example if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.



Object

... object to our processing of your personal data based on (among others) legitimate interest under certain circumstances. You may always object to the processing of your personal data for direct marketing purposes.

You are always entitled to file a complaint with a data protection supervisory authority if you believe that we are not processing your Personal Data in accordance with the GDPR. In the Netherlands, the supervisory authority for data protection is:

Autoriteit Persoonsgegevens

Website: www.autoriteitpersoonsgegevens.nl

If you have questions or concerns about this Privacy Notice or your privacy, you can contact our Privacy Officer via email (legal@notyd.com).

NOTYD B.V.

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The Netherlands

T: 085 401 1797

E: legal@notyd.com

W: www.notyd.com

Chamber of Commerce: 82724385

Cookie Statement NOTYD B.V.

NOTYD B.V.

What are cookies?

Cookies are little (text) files which are stored on your computer. Your web browser stores these cookies when you visit our **Website**: <https://biller.ai>. These cookies will be retrieved when you visit our Website again. This allows us to recognise you as a previous visitor.

Why do we use cookies?

By using cookies, we can see how our Website is used and how we can optimise our Website and services. Cookies are also helpful to make the Website quick and safe. In addition, cookies by us or by third parties can be used to show you relevant advertisement based on your interests. See the table below for the specific purposes of each cookie we use.

Which cookies do we use?

	NAME(S)	FUNCTION/PURPOSE	RETENTION PERIOD
NOTYD.com	_clk	Collects data on the user's navigation and behavior on the website. This is used to compile statistical reports and heatmaps for the website owner	1 year
	Visitor_id-hash	Used to encrypt and contain visitor data. This is necessary for the security of the user data.	400 days
	Intercom_id	Enable and enhance chat functionality of the Website.	270 days
	_clk	Registers statistical data on users' behavior on the website. Used for internal analytics by the website operator.	1 day
	Wp-wpml_current_language	Designates the country code that is calculated based on the user's IP address. Used to determine what language should be used for the visitor.	Session
	Pardot Visitor_id#	Used in context with Account-Based-Marketing (ABM). The cookie registers data such as IP-addresses, time spent on the web site and page requests for the visit. This is used for retargeting of multiple users rooting from the same device addresses. ABM usually facilitates B2B marketing purposes.	Session
LinkedIn Please consult this LinkedIn Policy for more information.	bcookie bscookie	Used by the social networking service, LinkedIn, for tracking the use of embedded services.	2 years

	Lidc	Provides load balancing functionality and tracking embedded links on device.	1 year
	Li_sugr	Collects data on user behaviour and interaction in order to optimize the website and make advertisements on the website more relevant	3 months
	AnalyticsSyncHistory	Used in connection with data-synchronization with third-party analysis service.	29 days
	UserMatchHistory	Ensures visitor browsing-security by preventing cross-site request forgery.	29 days
	lang	Set by LinkedIn when a web page contains an embedded "Follow us" panel.	Session
Google Please consult this Google Policy for more information.	_ga _ga_#	Registers a unique ID that is used to generate statistical data on how visitors use the Website via Google Analytics.	2 years
	IDE	Used by Google DoubleClick to register and report the user's actions after viewing or clicking on one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user.	1 year
	gcl_au	Used by Google AdSense for experimenting with advertisement efficiency across web sites using their services.	3 months
	Test_cookie	Used to check if the user's browser supports cookies.	1 day
	Ads/ga-audiences	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's on line behaviour across websites.	Session
	pagead/1p-user-list/#	Tracks if the user has shown interest in specific products or events across multiple websites and detects how the user navigates between sites. This is used for measurement of advertisement efforts and facilitates payment of referral-fees between websites.	Session
Clarity.ms Please consult this Clarity Policy for more information.	CLID	Identifies the first-time Clarity saw this user on any site using Clarity.	1 year

	Muid	Identifies unique web browsers visiting Microsoft sites. These cookies are used for advertising, site analytics, and other operational purposes.	1 year
	MR	Indicates whether to refresh MUID.	7 days
	SM SRM_B	Used in synchronizing the MUID across Microsoft domains.	Session
	_cltk C.gif	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	Session
Facebook Please consult this Facebook Policy for more information.	_fbp	Used by Facebook to deliver a series of advertisement products such as real time bid ding from third party advertisers.	Until deletion
	lastExternalReferrer lastExternalReferrerTime	Detects how the user reached the website by registering their last URL-address.	Until deletion

Can I delete the cookies?

Yes, you may delete the cookies yourself in your internet browser.

If you don't want cookies to be send to your device at all, you may change this via the cookie settings in your internet browser. Please keep in mind that some of the functions and services on the Website might not function (as good) without cookies.

Amendments to this Cookie Statement

This Cookie Statement may be amended from time to time. The most recent version of this Cookie Statement applies. We advise you to read this Cookie Statement regularly to see if there are any changes.

NOTYD B.V.

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