



Appendix 1: Loyalty

Display of Benefits in the Vipps Mobilepay App

A.Information about the processing

A.1. The purpose(s) of processing of personal data:

To display Benefits on the Vipps MobilePay app of the data subjects who requested the “Loyalty” service through the app.

Vipps MobilePay will receive the details concerning the Loyalty program, for the purpose of displaying the Benefits on the app. For this purpose, Vipps MobilePay will be acting as Processor while the Merchant will be acting as the Controller.

If the user is subscribed to a loyalty scheme of the Controller and requested to receive the Benefits in the Processor’s app, originating from the loyalty scheme of the Controller, the parties will be handling data to be able to provide the requested services to the user.

If the user is not part of any loyalty program of the Controller, the phone number, e-mail address or any similar primary identifiers, concerning the non-member user, shall not be further processed by the Controller and shall be deleted in a timely manner.

Parties will not further process the exchanged data, for any other purposes.

A.2. The Processor’s handling of personal data on behalf of the Controller shall primarily encompass the following activities (nature of the processing):

The Processor will activate the service exclusively for data subjects who have explicitly opted into the service. Opt-in requires the data subject to demonstrate active intent by sharing their phone number via the Processor’s application with the Merchant, or a representative or processor acting on behalf of the Merchant. This enables the Processor to establish a connection between the user and the relevant loyalty program. Consequently, the Processor will be able to retrieve and display the associated benefits for the requesting user.

Agreed primary identifier of data subject(s), may be delivered to the Controller or to the processor who acts on Controller’s behalf, and who is an intermediary in the process, on behalf of the Merchant as the Controller, that handles the data for validating and accommodating the existing loyalty program.

Controller will authorize the Processor to receive the below mentioned data in section A.3 from the Merchant’s intermediary/processor if the validation has shown that the user is a member of the loyalty program of the Controller.

The Processor will receive updated information each time the data subject logs in to the service page within the app, provided that the data subject is a current member of the loyalty program at that time.

A.3. The processing will involve the following categories of personal data:

- Phone number
- Membership ID
- Available Benefits in the loyalty program offered by the Controller
- Ongoing session updates

Regarding the phone numbers, that are sent by the Vipps MobilePay, solely to validate whether the data subject is associated with an existing loyalty program offered by the Merchant, Vipps MobilePay will be acting in its capacity as the Data Controller.

Vipps MobilePay will be also the controller for the logs of in app activities that is processed for providing instantaneous and up-to-date Benefits to the user and to calculate fees under the Main Agreement. The API will call for an update, when user gets to the Loyalty tab, when clicked a Benefit and such. By so merchant will be informed of when user has used the Loyalty service, when they saw or used a Benefit. Parties will process this data strictly for the purpose of providing the required service and nothing more.

Additionally, if any further data would be received by Vipps Mobilepay as the Processor, due to the technical capabilities of the Merchant's intermediary/processor, it shall not be stored or processed for any purpose by the Processor, unless it is agreed otherwise between the Controller and Processor.

A.4. Processing includes the following categories of data subject:

Common customers of the Controller and Processor.

A.5. The data processor's processing of personal data on behalf of the data controller may be performed when the Clauses commence. Processing has the following duration:

The processing will last as long as the service is requested by the data subject. Data will be deleted afterwards, in a timely manner.

B. Approved sub-processors

On commencement of the Clauses, the data controller authorizes the engagement of the following sub-processors:

Name	Address	Description of processes
Microsoft Azure	Netherlands	Storage, monitoring. Possible caching at some point in the pilot, if performance deems it necessary.
Splunk Cloud	Germany	
Mixpanel	Netherlands	

The data controller shall on the commencement of the Clauses authorize the use of the abovementioned sub-processors for the processing described for that party. Within the conditions described in section 7.3, the data processor is authorized to engage other sub-processors for any processing activity that is described in the Merchant Agreement and herein.