

Appendix 2 – Login – Managing Communication Channels and Consents (“Marketing Consent”)

A.1. The purpose of the data processor’s processing of personal data on behalf of the data controller is:

Login is a product that enables Vipps MobilePay Users (“users”) to be able to sign up to an integrated service provided by the Merchant (“Controller”).

In the Login flow, there is an integral service that allows Controller to present the communication channels that are either required as part of its Terms and Conditions or can be collected based on the consent of the user for the purpose of marketing and/or similar services.

Processor will present users with a screen representing either the required channel(s) of communication and/or the option(s) designated by the Controller that users can opt-in.

For the stated purposes, Processors will be collecting and communicating the choices made by the users to the Controller.

A.2. The data processor’s processing of personal data on behalf of the data controller shall mainly pertain to following(the nature of the processing):

- Presenting the required and optional communication channels to the users
- Gathering and transmitting user choice information to the Controller

A.3. The processing includes the following types of personal data about data subjects:

Choices (opt-in / consent information) made by the user

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

Customer of the Processor and prospective or current subscriber/customer of the Controller

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 choices made by the users are kept only 15 (“Fifteen”) minutes.



B. Approved sub-processors

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

NAME	ADDRESS	DESCRIPTION OF PROCESSING
Microsoft Azure	EU	Storage, monitoring. Possible caching at some point in the pilot, if performance deems it necessary

The data controller shall on the commencement of the Clauses authorise 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 Main Agreement and herein.