

## Appendix 1: Customer Club

### Display of Benefits in the Vipps Mobilepay App

#### A. Information about the processing

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

Displaying Benefits on the Vipps Mobilepay app of the data subjects who requested the service through the app.

If the user is subscribed to a loyalty scheme of the Controller and the user is requesting to receive the benefits in the Processor's app, originating from the loyalty scheme of the Controller, the parties will be exchanging data to be able to provide such services to the user.

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

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

##### 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):

The Processor will only activate the service for the data subject(s) who opted in-to the processing. The data subject(s) will be informed of and shall display intent of opting in to the service, by actively sharing the phone number through the Processor's app with the Merchant, or a representative and/or a processor of the Merchant to be able to connect the user with the relevant loyalty program. This way the Processor will be able to receive and display the Benefits concerning the requesting user.

Agreed primary identifier of opted-in data subjects may be delivered to the Merchant or Merchant's processor (who is an intermediary in the process, on behalf of the Merchant (Controller), for the validation and accommodation of an 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 data subject is a member of the loyalty program of the Controller.

Processor's app will be receiving updated information, every time the data subject logs-in to the service page on the app if the data subject at that time is a current member of the loyalty program.

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

Phone number, membership id, available Benefits in the loyalty program of the Controller, session updates.

With regard of phone numbers, that are sent by the Processor in its capacity as a controller with the sole purpose of validation of an existing loyalty program of the Controller.

In regard of session updates (logs on in-app activities) that are made by Vipps MobilePay acting as a controller in order to provide instantaneous and up-to-date Benefits to the customer and to calculate fees under the Main Agreement, but may only in relation to personal data received from the Controller be processed for this specific purpose.

Additionally, due to the technical capabilities of the intermediary/processor, if any data that is received through the established API, it will not be stored or processed for any purpose by the Processor, unless it is agreed otherwise by 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 authorises the engagement of the following sub-processors:

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

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.