

HYGGEX FINANCE

PRIVACY POLICY

HYGGEX FINANCE – PRIVACY POLICY VER. 1.0

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1. Introduction

Hyggex Finance ApS is a company incorporated under the laws of Denmark and is in the process of obtaining authorisation as a Payment Institution from the **Danish Financial Supervisory Authority (DFSA)**. This **Privacy Policy** (hereinafter also referred to as the **Policy**) defines the principles governing the collection, processing, and storage of personal data provided by Customers or collected through the use of Hyggex Finance's services.

For the purposes of this Policy, **personal data** refers to any information related to an identified or identifiable natural person (**data subject**). An identifiable person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier, or other factors related to their physical, physiological, genetic, mental, economic, cultural, or social identity.

By submitting personal data, Customers consent to its processing, storage, and transfer in accordance with the provisions set out in this Policy. Hyggex Finance applies all reasonable measures to ensure that personal data is processed securely and in compliance with applicable legal requirements.

Prior to using the website or engaging with the services of Hyggex Finance, Customers are presumed to have read and accepted this Policy.

This document represents the most recent version of the Policy. Hyggex Finance reserves the right to amend or update the Policy as necessary, incorporating regulatory changes, updates in data protection practices, or adjustments to the Company's business operations. At a minimum, the Policy will be reviewed annually to reflect relevant legislative amendments, operational adjustments, or external regulatory developments affecting the services of Hyggex Finance.

Commitment to data protection and privacy is a fundamental principle of Hyggex Finance. The Company adheres to applicable legal frameworks, ensuring compliance with relevant **Danish** and **European** data protection regulations, safeguarding the confidentiality and security of personal data.

Personal data is processed in accordance with:

- Danish Data Protection Act (Databeskyttelsesloven)
- General Data Protection Regulation (EU GDPR) (Regulation (EU) 2016/679)
- Danish Financial Business Act (Lov om finansiel virksomhed)
- Danish Payment Act (Betalingsloven)
- Danish Bookkeeping Act (Bogføringsloven)
- European Union Standard Contractual Clauses (SCC)
- Guidelines issued by the Danish Data Protection Agency (Datatilsynet)
- European Data Protection Board (EDPB) Guidelines
- Any other applicable Danish or EU laws regulating the protection of personal data

Transfers of personal data outside the **European Economic Area (EEA)** are conducted only where appropriate safeguards are in place to ensure compliance with GDPR and to protect the rights and freedoms of Customers.

2. Data Controller. Responsible Person. Supervisory Authority and Website

2.1. Data Controller

Hyggex Finance ApS acts as the **Data Controller** (hereinafter referred to as the **Controller**) and is responsible for determining the purposes and means of processing personal data collected from Customers. The Company is incorporated under the laws of Denmark and is in the process of obtaining authorisation as a **Payment Institution (PI)** from the **Danish Financial Supervisory Authority (DFSA)**.

Legal address: Maglebjergvej 6, 2800 Kongens Lyngby, Denmark

Customers may request information at any time regarding their personal data held by Hyggex Finance, including details on data collection, processing, and storage. Any such requests should be directed to the designated responsible person.

2.2. Responsible Person for Data Protection

The **Head of Compliance/MLRO** is responsible for overseeing data protection compliance and ensuring that personal data is processed in accordance with applicable laws and regulations. This includes handling customer inquiries, ensuring internal compliance with data protection principles, and acting as the primary point of contact for data-related matters.

For any inquiries regarding personal data or this Privacy Policy, please contact:
Email: compliance@hyggex.dk

2.3. Supervisory Authority

Hyggex Finance ApS is subject to the jurisdiction of the **Danish Data Protection Agency (Datatilsynet)**, which is responsible for overseeing compliance with data protection laws in Denmark.

Datatilsynet Contact Information:

Carl Jacobsens Vej 35, 2500 Valby, Denmark

Telephone: +45 33 19 32 00

Website: www.datatilsynet.dk

3. Grounds for Personal Data Processing

Hyggex Finance ApS processes personal data only when there is a valid legal basis for doing so. Personal data is processed in the following circumstances:

- The purposes of processing have been clearly defined in advance.
- The amount of personal data collected is limited to what is necessary for the specified purpose.
- A legal basis for processing has been established.
- Customers have been informed of their rights regarding the processing of their personal data.

The processing of personal data is conducted in accordance with applicable legal requirements and follows standard procedures based on the following grounds:

1. **Performance of a contract** – Personal data is processed when it is necessary to provide services to Customers and establish a contractual relationship. This includes remote registration for the use of Hyggex Finance ApS services and ongoing service provision.
2. **Compliance with legal obligations** – Hyggex Finance ApS is required to process personal data in accordance with Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) regulations, including customer due diligence and Know Your Customer (KYC) procedures. These obligations are outlined in **the Danish Anti-Money Laundering Act (Hvidvaskloven)** and other relevant financial crime prevention laws applicable in Denmark and the European Union.
3. **Legitimate interests** – Processing may be carried out where it is necessary for the legitimate interests of Hyggex Finance ApS or a third party, provided that such interests do not override the rights and freedoms of data subjects. This includes fraud prevention, security measures, and internal risk management.
4. **Risk assessment and management** – Personal data may be processed to conduct risk analysis and financial monitoring to ensure compliance with regulatory requirements and to mitigate potential financial and operational risks.
5. **Customer consent** – Where required, Hyggex Finance ApS may process personal data based on explicit Customer consent. This applies, for example, when Customers sign up for newsletters, marketing communications, or voluntarily provide additional information through the website. Customers have the right to withdraw their consent at any time.

4. Personal Data Storage

Hyggex Finance ApS processes personal data for the duration of the business relationship with the Customer and retains it after the termination of the relationship to comply with legal and regulatory requirements, as well as to protect the Company's legitimate interests.

Personal data is stored for a period of **five (5) years** from the date of termination of the business relationship, unless a longer retention period is required under applicable laws and regulations.

Hyggex Finance ApS ensures that personal data is stored in a secure and centralised manner. Once the mandatory storage period expires, data is either erased, anonymised, or securely destroyed, in accordance with applicable data protection laws. If legal or regulatory restrictions prevent data erasure (e.g., an ongoing investigation or a regulatory retention requirement), the data will be retained until such restrictions are lifted.

When determining the duration of personal data storage, Hyggex Finance ApS considers:

- Legal and regulatory requirements under **Danish and EU data protection laws**.
- Contractual obligations that require the retention of specific data.
- Customer instructions (for example, in cases where processing is based on consent).
- Legitimate business interests, including fraud prevention, legal claims, and compliance with financial regulations.

If personal data is no longer required for the purposes for which it was collected, it will be securely deleted or anonymised. In exceptional cases, personal data may be retained for a different purpose if such processing is required by regulatory or legal obligations, or is necessary for the protection of the Company's legitimate interests.

This version ensures compliance with **Danish and EU regulations** and removes unnecessary repetition while maintaining a clear and professional structure. Let me know if any refinements are needed.

5. Personal Data Transfer

Hyggex Finance ApS does not rent or sell personal data under any circumstances. Personal data is transferred to third parties strictly in compliance with applicable Danish and European laws and regulations, solely for the purpose of providing services, and exclusively on the basis of agreements that ensure confidentiality and secure data processing.

Transfers of personal data occur only when:

- A lawful basis for the transfer has been established.
- The transfer is necessary for the provision of services.
- A contractual arrangement exists between Hyggex Finance ApS and the receiving party, ensuring compliance with confidentiality and security requirements.

Third-party recipients of personal data include:

- Financial institutions and payment service providers involved in transaction processing.
- IT infrastructure providers, including internet hosting and SMS communication platforms.

- KYC/AML verification service providers and fraud prevention database operators.
- Regulatory authorities, law enforcement agencies, or courts, when required by applicable legislation.

In certain situations, disclosure of personal data may be necessary, including but not limited to:

- Requests or authorisation provided by the data subject.
- Emergency situations, force majeure events, or matters of public safety.
- Legal claims, dispute resolution, or when required by a court order.
- Situations where legally authorised representatives act on behalf of the data subject.

5.1. Cross-Border Data Transfers

Transfers of personal data outside the **European Union (EU)** or the **European Economic Area (EEA)** are conducted only when one of the following conditions is met:

- The European Commission has recognised the recipient country as ensuring an adequate level of data protection.
- Appropriate safeguards are implemented, such as Standard Contractual Clauses (SCCs), binding corporate rules, or other mechanisms compliant with GDPR requirements.
- The transfer is based on specific legal exceptions, including but not limited to:
 - Explicit consent given by the data subject, after being informed of potential risks.
 - The necessity of the transfer for the performance of a contract or pre-contractual measures.
 - The necessity of the transfer for the conclusion or performance of a contract in the data subject's interest.
 - Compliance with public interest requirements.
 - The establishment, exercise, or defence of legal claims.
 - Protection of the data subject's vital interests, in cases where consent cannot be provided.

Hyggex Finance ApS may also process personal data obtained from external sources, including:

- Publicly available databases, such as corporate and trade registries.
- KYC/AML screening databases and sanction lists.
- Fraud prevention and risk management services.
- Third-party verification providers.

All data processors and service providers are carefully selected. Transfers of personal data are carried out only when necessary, subject to strict confidentiality and security measures, and in full compliance with applicable legal requirements.

6. Personal Data Processed

Hyggex Finance ApS processes various categories of personal data necessary for the provision of services, regulatory compliance, and risk management. Data processing is conducted in accordance with Danish and European legal requirements, including anti-money laundering (AML) and counter-terrorism financing (CTF) regulations.

The categories of personal data processed are structured to facilitate effective management and compliance with legal obligations.

Categories of Personal Data Processed:

Category	Description
Basic Identification and Verification Data	Name, surname, former names, identity number, date of birth, photograph, copy of identity documents, proof of residence, preferred communication language, email address, phone number, audio/video recordings, selfies.
Profiling and Behavioural Data	Information used for AML risk assessment, including factors such as age, gender, nationality, citizenship/residence, business or personal activities, geographic location, education, employment, professional background, purpose of business relationships, source of funds, and wealth origin.
Financial Data	Information related to income, assets, projected transaction volume, transaction nature, and tax-related details.
Special Category Data	Data regarding politically exposed persons (PEPs), sanction lists, criminal records, bankruptcy, insolvency, enforcement actions, or bailiff claims.
Data Obtained from Legal Obligations	Information provided upon request from investigative authorities, tax agencies, bailiffs, or regulatory bodies.
Transaction Data	Business partners and transaction counterparties, including bank details (account number, SWIFT, BIC), card information (card number, CVV/CVC, expiry date, cardholder details), transaction history, amounts sent/received, invoices, virtual financial asset transactions, fiat-to-crypto exchanges, and ongoing monitoring of transaction patterns.
Telecommunications and Online Communication Data	Phone numbers, email addresses, social media profiles (LinkedIn, Twitter, Facebook), Skype details, website interactions.
Authentication and Technical Data	Username, password, login details, device type, browser type, time zone settings, location, session duration, PIN code, IP address (including VPN use), and electronic signature details.

Customer Support and Contact Data	Data obtained when customers contact Hyggex Finance ApS, including email exchanges, submitted queries, and any personal data provided within such communications.
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Personal data is obtained from various sources, including data subjects themselves, authorised representatives, publicly available registers, private databases, and external compliance service providers.

Hyggex Finance ApS applies strict security measures to protect all collected personal data from unauthorised access, unlawful processing, accidental loss, modification, or destruction, ensuring compliance with applicable legal and regulatory requirements.

7. Rights Related to Personal Data Processing

Hyggex Finance ApS acknowledges and respects the rights granted under applicable data protection legislation regarding the processing of personal data. The following rights are recognised and upheld in accordance with the **General Data Protection Regulation (EU GDPR) and Danish Data Protection Act (Databeskyttelsesloven)**.

Right of Access and Data Portability

- Access to personal data, including the right to obtain additional information about its processing.
- Receipt of an electronic copy of personal data processed by Hyggex Finance ApS.

Right to Rectification and Erasure

- Correction of personal data if it has changed or is found to be inaccurate.
- Request for deletion of personal data if it is no longer required for the purposes for which it was collected, provided no legal or regulatory obligation requires continued retention.

Right to Restriction of Processing

- Request to restrict the processing of personal data, meaning the data may only be stored and used for legal claims, regulatory compliance, or with explicit consent.
- Restriction may apply in cases where:
 - The accuracy of personal data is contested.
 - Data is being processed unlawfully, but deletion is not requested.
 - Processing is no longer necessary, but the data is required for legal claims.
 - An objection to processing has been raised, pending further assessment.

Right to Object to Processing

- Objection to processing based on legitimate interests of Hyggex Finance ApS or third parties if the fundamental rights and freedoms of the data subject override such interests.

Right to Be Informed of New Processing Purposes

- Notification in advance if personal data is to be processed for a new purpose not originally disclosed.
- Information regarding whether the provision of personal data is required by law or contract and the consequences of not providing such data.

Rights Related to Automated Decision-Making and Profiling

- Request for human intervention in cases where significant decisions are made solely based on automated processing.
- Right to opt out of decisions that rely purely on automated calculations.

Right to Lodge a Complaint

- Filing a complaint with the **Danish Data Protection Agency (Datatilsynet)** if concerns arise regarding the processing of personal data.

Right to Withdraw Consent

- Withdrawal of consent for personal data processing at any time, without affecting the lawfulness of processing conducted prior to withdrawal.

Exercising Data Subject Rights

- Reasonable access to personal data will be provided upon request at no cost.
- Requests should be submitted via email to compliance@hyggex.dk
- If access cannot be provided immediately, a timeframe for response will be communicated. If access is denied, a justification for the denial will be provided.

8. Personal Data Recipients

Hyggex Finance ApS may disclose personal data to the following categories of recipients in accordance with applicable legal and regulatory requirements:

Internal Recipients

- Members of management bodies.
- Employees, representatives, and authorised persons of Hyggex Finance ApS.

Regulatory, Supervisory, and Legal Authorities

- Public institutions, government authorities, and public officials.
- Investigatory authorities, courts, prosecutors, and law enforcement agencies.

- Operational and intelligence agencies.
- Notaries and arbitration courts.
- Tax authorities and regulatory bodies responsible for financial supervision.
- Judicial and investigatory authorities of other EU member states and foreign jurisdictions.
- Out-of-court dispute resolution bodies.

Financial and Business Partners

- Correspondent banks, insurance companies, payment systems, and credit registers.
- Securities registries, stock exchanges, depositories, and financial service intermediaries.
- Business partners of Hyggex Finance ApS or its Customers involved in financial transactions.

External Service Providers

- Cooperation partners, agents, and third-party suppliers.
- KYC/AML compliance service providers.
- IT service providers and infrastructure support providers.
- Auditors, legal advisors, and external consultants.

Disclosures are conducted only when necessary for regulatory compliance, risk management, service provision, or legal obligations, ensuring that data security and confidentiality measures are maintained at all times.

9. Website and Cookies

The official website of **Hyggex Finance ApS** is under development <https://hyggex.dk/>. The website serves as an informational resource, providing details about the company's business activities, available services, and the terms and conditions governing their use.

Third-Party Links and External Websites

The website may include links to third-party websites, plug-ins, or applications. Engaging with such links may enable third parties to collect or share data. Hyggex Finance ApS does not control external websites and assumes no responsibility for their privacy policies, statements, or practices. Visitors are encouraged to review the privacy policies of any external websites accessed.

Protection of Minors

The website is not intended for minors, and Hyggex Finance ApS does not knowingly collect personal data from individuals under the age of 13. If it is discovered that personal data belonging to a minor has been collected, appropriate measures will be taken to delete such information. Any concerns regarding the potential collection of a minor's data should be reported to compliance@hyggex.dk

Use of Cookies

Cookies are small text files stored on a visitor's device to improve website functionality, track usage patterns, and remember user preferences.

The website uses the following types of cookies:

Type of Cookie	Purpose	Storage Duration
Session Cookies	Ensure security and maintain website functionality during a session.	Processed only during an active website visit.
Persistent Cookies	Store user preferences such as language settings and login details, as well as statistics on website navigation.	Retained until expiration or manual deletion.
Third-Party Cookies	Utilised by analytical tools such as Google Analytics to track visitor behaviour across multiple websites and optimise website performance.	Subject to third-party retention policies.

Cookie-related data is stored only for the duration specified and is not used for any purposes beyond those explicitly stated.

User Control over Cookies

Each time the website is accessed from a new IP address, visitors may **accept or reject cookie processing**.

Browser settings can be adjusted to provide alerts when cookies are used or to disable cookies altogether. More information on managing cookies is available at <http://www.allaboutcookies.org/manage-cookies/>.

Disabling cookies may affect website functionality, limiting certain features and potentially impairing the performance of specific services.

Security and Data Protection

Cookies do not contain viruses or malicious software, and they **cannot install spyware** or other harmful programs on a visitor's device. The website undergoes regular security scans to identify vulnerabilities and ensure a safe browsing experience.

Hyggex Finance ApS respects the privacy of website visitors and does not process cookies without prior consent. The company does not attempt to identify visitors based on cookie data.

