

PRIVACY STATEMENT - SWIFT Developer Portal

Introduction

S.W.I.F.T. SCRL (hereinafter "SWIFT", with registered office at Avenue Adèle 1, B-1310 La Hulpe, Belgium) and other SWIFT entities as listed <u>here</u> are committed to protecting your privacy.

In this Privacy Statement, the terms "Controller", "Data Subject", "Personal Data", "Processor" and "Processing" shall have the meaning given to these terms in the EU General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) (hereinafter referred to as "EU Data Protection Law").

The Privacy Statement explains how your Personal Data is processed by SWIFT, as data Controller for the data Processing activities described in this statement, when collected through this Portal (e.g. when you submit your data through the registration tool), or during the interactions you may have with us. In this regard, SWIFT will process all your Personal Data in compliance with the EU General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) and other applicable data protection legislation (hereinafter "Data Protection Laws").

We may modify this Statement from time to time. Please check it periodically for changes, in particular when you submit Personal Data on this Portal.

SWIFT Purposes

SWIFT processes Personal Data collected on this SWIFT Developer Portal (the "Portal") or through the interactions you have with us (see above), for the following purposes (together "SWIFT Purposes"):

- the access and use of SWIFT's APIs and any related SWIFT services and products as referred to in the Terms of Use of this Portal;
- sending commercial communications, newsletters and other customer communications
- The operation of this Portal (IP addresses, cookies, web acceleration, Data security, Data anonymisation for reporting and statistics)
- For the exercise of SWIFT's obligations, rights and remedies as set out in this Privacy Statement and the Terms of Use related to this Portal.

For these purposes, SWIFT will generally process the following data pertaining to you (depending on activity/form used by you): IP address, identification information (e.g. last name, first name, job title, contact details - such as mobile, landline, email address - company name, etc.), login and password, the history of your interactions with SWIFT (e.g. activities on the Portal, downloads, connection logs, etc.)., etc.



More information about the use of your data for the specific purposes is given below. Where applicable, we indicate whether and why you must provide us with your Personal Data, as well as the consequences of failing to do so. If you do not provide your data when requested, you may not be able to benefit from our services, if that data is necessary to provide you with the services or if we are legally required to collect it.

Access to SWIFT APIs and related SWIFT services and products

SWIFT will Process your Personal Data submitted on this Portal to the extent this Processing is necessary for the access and use of the SWIFT APIs and related products and services, and as documented in the related Terms of Use.

If you object to this processing, you may no longer be able to access our Portal and use its features.

Newsletters and Other Customer Communications

SWIFT has a legitimate interest to Process Personal Data that you submit on this Portal or during your interactions with us, to provide you with access or use of SWIFT APIs or any commercial communications related to other SWIFT products and services that you use or purchased, including related events. In addition, you can consent to receiving other commercial communications pertaining to SWIFT's events, products and services, and its newsletters.

You have the right to opt-out for this type of communication at any moment without giving a motivation.

To monitor the effectiveness of email, online advertising and social media campaigns as well as the level of engagement on this Portal or other swift.com web pages, SWIFT measures the ratio of clicks on specific links provided through these different channels, and other online interactions, such as searching a page or watching a video. These types of processing are on aggregated data.

If you are a SWIFT.com registered user, you can at any time manage your communication preferences and subscriptions to our newsletters by accessing your preference center through the secured area of "mySWIFT". If you are not a SWIFT.com registered user, you can access your preference center through a link provided in each commercial e-mail from us.

Operation of this Portal



SWIFT has a legitimate interest to Process your Personal Data for the operation of this Portal and as detailed below:

IP Addresses

For our internal purposes, we may use IP addresses (the Internet address of your computer) stored in web logs to generate aggregate statistics on the usage of our portal, such as volume, traffic patterns and time spent on a page.

Hyperlinks to other websites

Our Portal may contain links to other websites not owned or operated by SWIFT. SWIFT is not responsible for the privacy practices of these websites.

Cookies

Our Platform use cookies. Cookies are small pieces of information that are stored by your browser on your computer's hard drive or in your browser memory.

The information stored with cookies include your name, first name, registration number on the Portal, language preference and navigation settings, login ID, and IP addresses.

For a detailed description on the use and purposes of cookies via this Website, please consult the SWIFT Cookie Policy available on SWIFT.com and which applies by analogy to the extent relevant to this Portal.

Data Security

We are committed to protect your Personal Data against accidental or unlawful destruction, accidental loss, alteration, and unauthorized disclosure or access. Therefore, we monitor and record the data exchange (IP address, timestamp, volumes), both incoming and outgoing, in order to preserve the security, integrity and availability of our infrastructure. In addition, in case of suspicious activity, SWIFT might collect data (including personal data) from various sources (e.g. public sources, threat intelligence providers, etc.) in order to start and manage its own investigation.

These data are kept for up to one year. Data can be kept longer when a security issue has been encountered and evidences need to be kept for SWIFT to exercise its rights and remedies.

Any Personal Data collected during this process may be shared by SWIFT with the relevant authorities.

Please be aware that we cannot ensure the security of your data on your computer or during transmission over the Internet. In this regard, we advise you to take every possible precaution to protect Personal Data stored on your computer and transiting on the Internet.

Data anonymisation for reporting and statistics

SWIFT has a legitimate interest to produce reports and statistics about the usage of the Portal (e.g. visitors per day, geographical reach, etc.).



These reports will be fully anonymised.

Data Submitted on Behalf of Someone Else

If you provide Personal Data of another person to SWIFT for the purposes mentioned above, you shall ensure that (i) this person has been duly informed about SWIFT's right to process such Personal Data as set out herein and has been provided with the present Privacy Statement, (ii) such Personal Data are collected and supplied in accordance with applicable legislation and without infringing such person's or any third party rights and (iii) you have obtained his or her prior consent where needed.

Sharing Data

When required for the SWIFT Purposes, we may share your data with other offices in the SWIFT group (see the SWIFT Offices page for more information), other users of our Portal, carefully selected suppliers (e.g. security specialists, maintenance suppliers, marketing/events organisation suppliers), or other selected third parties (typically SWIFT partners or sub-contractors).

Before sharing your data, we require such third parties to only process your Personal Data on our instructions and to provide sufficient guarantees in respect of the technical and organisational security measures protecting the data processing activities.

Such SWIFT offices or third parties may be located in or outside the European Economic Area (EEA), including in countries that do not offer a level of data protection considered as adequate under a EU Commission adequacy decision.

In the latter case, we ensure the lawfulness of such transfers by:

- agreeing with other SWIFT offices on the standard contractual clauses approved by the European Commission Decision 2004/915/EC of 27 December 2004;
- agreeing with third parties on the most appropriate statutory, contractual, or self-regulatory basis (for example Privacy Shield certification) to allow such transfers.

You have a right to obtain more information about these safeguards used to transfer data outside of EEA, by contacting our Data Protection Officer (see below).

Your Rights

Your Personal Data will not be kept by SWIFT for longer than necessary, after which your Personal Data will be deleted. As general rule, and unless specified differently in this Privacy Statement, SWIFT will keep your data for the duration of the statute of limitation applicable to our relationship with you.



During this period, you have the right to access, correct, restrict, receive a copy and even erase your own Personal Data in accordance with the Data Protection Laws, and you can object to the processing of your Personal Data for direct marketing purposes.

In addition, where relevant, you can withdraw your consent at any time and without motivation for those types of data Processing to which you consented. Note however that this does not affect the lawfulness of the data Processing based on your consent before the withdrawal.

Finally, in some circumstances, you have as well the right to object to the Processing of your Personal Data mentioned above.

You may exercise your data protection rights by sending your request together with a proof of your identity to SWIFT's Privacy Officer (see below).

If you have any other questions or complaints regarding the Processing of your Personal Data, you can also contact the SWIFT's Privacy Officer or lodge a complaint with the supervisory data protection authority in your country of residence, place of work or where an incident took place. In Belgium, the data protection authority is:

Belgian data protection authority

Rue de la Presse 35, 1000 Brussels

Phone: +32 (0)2 274 48 00

Fax: +32 (0)2 274 48 35

E-mail: contact(at)apd-gba.be

Website: www.dataprotectionauthority.be

Privacy Officer

The SWIFT Privacy Officer carries out internal supervision in connection with our responsibilities under this Statement.

You may exercise your rights and address any questions to the Privacy Officer:

by letter to S.W.I.F.T. SCRL, attention of Privacy Officer, Avenue Adèle 1, 1310 La Hulpe, Belgium

by e-mail to privacy.officer@swift.com.