Kustom Privacy and Cookie Notice (“Privacy Notice”)

Effective: 27 January 2025
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General information about the collection of personal data

Kustom AB (“**Kustom**”, “**We**”, “**Us**” **and** “**Our**”), Sturegatan 6, 114 35 Stockholm, Sweden, takes the protection of your personal data seriously. This Privacy Notice describes how Kustom processes and protects the personal data collected and processed in the context of automatically filling user information, letting users choose their preferred payment service provider and redirecting users to their preferred payment service provider according to their choice (together referred to as “**Kustom Checkout**”), as well as in the context of enabling in-person payment acceptance via tap to pay functionality (Mobile Point of Sale) (“**MPOS**”). This Privacy Notice consists of a “**Summary Notice**” (see below at section A.) and a “**Detailed Notice**” (see below at section B.)

Personal data (“**Personal Data**”) are any information (such as, for example, your name, your address, your email address, your telephone number, your bank details, your credit-card number, your IP address etc.) relating to an identified or identifiable natural person (“**Data Subject**”). Your Personal Data are processed by Us only in accordance with the provisions of the Regulation (EU) 2016/679 (EU General Data Protection Regulation, “**GDPR**”) and other provisions of applicable national data protection laws.

This Privacy Notice relates exclusively to the Kustom Checkout and MPOS. In the event that you are directed via links from the Kustom Checkout or MPOS to third-party websites (e.g., the website of a payment service provider), please refer to such websites for information about how these third parties handle Personal Data.

A. Summary Notice

1. Scope of application, and responsible data controller

This Privacy Notice exclusively applies to the collection and processing of Personal Data of users of the Kustom Checkout and MPOS. This Privacy Notice does not apply to, in particular, the webshop into which the Kustom Checkout has been implemented (“**Webshop**”) by the provider of the Webshop (i.e., a third-party merchant, (“**Merchant**”)) and the processing of Personal Data by payment service providers selected by you during the checkout to pay for your order. Please review the privacy notice of the respective Merchant and/or payment provider for information on how they process your Personal Data.

The responsible data controller for any Personal Data collected and processed in connection with the use of the Kustom Checkout and MPOS is Kustom. Should another controller process Personal Data about how you use the Kustom Checkout or MPOS, you will be provided with a separate privacy notice.

2. The services provided

The Kustom Checkout is an integrated online checkout solution that streamlines the purchasing experience by automatically filling in user information, allowing users to select their preferred payment service provider and, if applicable, presenting personalized product recommendations directly within the checkout flow. The Kustom Checkout is implemented by Merchants into their Webshops and is designed to facilitate a faster and more convenient checkout process for the users. In connection with the Kustom Checkout We may collect and process Personal Data such as your name, address, telephone number, email address, and IP address.

If Kustom can identify you, the Kustom Checkout may autofill some information in the purchase flow, such as your name, address, telephone number, email address and date of birth (hereafter collectively referred to as "**Autofill**"). Autofill relies on either or both of the following methods:

(a) **Autofill through input of limited information**

While interacting with the Kustom Checkout, you may be asked to provide Personal Data. The Personal Data that you provide is then retained by the Kustom Checkout. If Kustom recognizes you when you interact with the Kustom Checkout at a later point in time based on certain Personal Data you enter to the Kustom Checkout (such as your email address and zip code), Kustom Checkout autofills other Personal Data previously provided. This happens both when you interact with the Kustom Checkout in the same Webshop in which you first entered the data for the Kustom Checkout or in the Kustom Checkout integrated in the Webshop of another Merchant.

(b) **Autofill through Kustom Checkout cookies:**

We might place Kustom Checkout-cookies on your device (computer, tablet, mobile phone, etc.). You may choose to store your Personal Data such as your name, address, telephone number, email address, date of birth, personal identification number, and preferred payment provider with the Kustom Checkout. If so, the Kustom Checkout-cookies fetch that information from the Kustom Checkout's storage and help Autofill it when shopping with the Kustom Checkout in the future.

When you are shopping on a Kustom Checkout connected Merchant's Webshop, the Kustom Checkout may also use information that the Merchant shared with Us to enhance the interaction with the Kustom Checkout and improve your shopping experience. In either case Personal Data is retained by the Kustom Checkout to facilitate future interactions. All Personal Data collected by Us to provide the Kustom Checkout is handled in accordance with this Privacy Notice.

The responsible data controller for any Personal Data collected and processed in connection with the use of the Kustom Checkout is Kustom. Should another controller process Personal Data about how you use the Kustom Checkout, you will be provided with a separate privacy notice.

If you do not want to use the Autofill functionalities, you can disable them by accessing your Autofill settings. You can access these settings by clicking Manage Autofill Settings during the purchase process. You can at any given time delete all cookies on Your device, which deletes Our cookies as well.

Express Checkout. As part of the Kustom Checkout, Kustom enables Merchants to offer Express Checkout – payment methods (such as Klarna, Apple Pay or PayPal) presented as direct payment buttons on a Kustom-rendered surface within the Merchant's Webshop. When You initiate a purchase via Express Checkout, the payment service provider collects Your Personal Data and authorises the payment, and subsequently transfers Personal Data such as Your name, email address, telephone number and order details to Kustom. Kustom discloses this Personal Data to the relevant Merchant so the Merchant can fulfil Your order, and retains it for use in connection with Your future purchases through the Kustom Checkout (for example, to provide Autofill). The processing of Personal Data in this flow is described in Appendix 1.

MPOS is an application that enables Merchants to accept contactless card and digital wallet payments directly on a compatible mobile device, such as a smartphone, using near-field communication technology. Through the MPOS-application, Merchants can initiate and complete in-person payment transactions and send digital receipts to the users. In connection with the MPOS We collect and process Personal Data such as your name, telephone number, and email address, as well as order details.

For details, please refer to section B and Appendix 1 "Personal Data**"** to this Privacy Notice.

2. **How to contact Us**

You can contact Us and Our data protection officer via post at Kustom AB, Sturegatan 6, 114 35, Stockholm, Sweden, or via the following email address: dataprivacy@kustom.co.

For details, please refer to section B.8.

3. **Categories of data We collect and process as well as purposes of the processing and legal bases**

Appendix 1 "Personal Data" to this Privacy Notice contains detailed information on (i) the categories of Personal Data We collect from you; (ii) the purposes for which We process these Personal Data; and (iii) the legal bases for the collection and processing of your Personal Data. If processing for another purpose takes place, We will provide you with additional information.

For details, please refer to section B.1.

4. **Recipients and categories of recipients to whom We transfer Personal Data**

We rely on third-party service providers to provide services and products on Our behalf, and We will share your Personal Data with them for the provision of the services and products.

We share your Personal Data with governmental authorities, courts, and similar third parties that are public bodies as well as external advisors as required or permitted by applicable law.

We share Personal Data with the recipients only to the extent necessary.

For details, please refer to section B.2.

5. **Cross-border data transfers**

Some of the recipients of your Personal Data are located or have relevant operations outside of the European Economic Area ("**EEA**") (namely, the USA and the UK). By way of entering into appropriate data transfer agreements or by other adequate means, We have established that all such recipients located outside the EEA, will provide an adequate level of protection (e.g., by being certified under the EU-U.S. Data Privacy Framework) for the Personal Data and that appropriate technical and organizational security measures are in place to protect Personal Data. Any onward transfer is subject to appropriate onward transfer requirements as required by applicable law.

For details, please refer to section B.3.

6. **Storage period**

Your Personal Data are stored by Kustom and/or Our service providers, strictly to the extent necessary for the performance of Our obligations to you respectively the performance of the

service providers' obligations to Us and strictly for the time necessary to achieve the purposes for which the Personal Data are processed, in accordance with applicable data protection laws.

When Kustom and/or Our service providers no longer need to process your Personal Data, the Personal Data will be erased from the systems and/or records and/or steps will be taken to properly anonymize the Personal Data so that you can no longer be identified from the Personal Data unless We and/or Our service providers need to keep your information:

- to comply with legal or regulatory obligations to which Kustom and/or Our service providers are subject; and/or
- with regard to a judicial action.

For details, please refer to section B.4.

7. **Use of cookies and similar technologies for the Kustom Checkout**

We use cookies and similar technologies for the Kustom Checkout and process personal data collected via these.

For details, please refer to section B.5.

8. **Your rights**

Under the conditions set out under applicable data protection law (e.g., the GDPR), you may have the following rights: (i) the right of access; (ii) the right to obtain a copy of your Personal Data undergoing processing; (iii) the right to rectification; (iv) the right to erasure ("right to be forgotten"); (v) the right to restriction of processing; (vi) the right to data portability; (vii) the right to object; and (viii) the right to lodge a complaint with the competent data protection supervisory authority.

If you have consented to any Personal Data processing activities, you can withdraw this consent at any time. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

For details, please refer to section B.6.

9. **Personal Data required to enter into a contract**

You only have to provide Personal Data that is marked as mandatory in the respective forms in the Kustom Checkout and MPOS. Without such Personal Data, We cannot conclude the requested contract, or We will no longer be able to execute an existing contract and may have to terminate it.

Personal Data that are not marked as mandatory in the corresponding forms in the Kustom Checkout and MPOS do not have to be provided.

For details, please refer to section B.7.

10. **Changes to the Privacy Notice**

This Privacy Notice may require an update from time to time. We reserve the right to change or supplement this Privacy Notice at any time. We will publish the changes on www.kustom.co and/or inform you accordingly.

For details, please refer to section B.9.

B. Detailed Notice

1. Categories of data that We collect and process as well as purposes of the processing and legal bases

Appendix 1 "Personal Data" to this Privacy Notice contains detailed information on:

- the categories of Personal Data that We collect from you in addition to other Personal Data that you actively provide to Us (e.g., when you enter Personal Data to the Kustom Checkout);
- the purposes for which We process these categories of Personal Data; and
- the legal bases for the collection and processing of your Personal Data (unless otherwise provided, e.g., at the time that We collect the data from you).

Please note that We process your Personal Data for other purposes only if:

- We are obligated to do so on the basis of legal requirements (e.g., transfer to courts or criminal prosecution authorities);
- if you have consented to the respective processing; or
- if the processing is otherwise lawful under applicable law.

If processing for another purpose takes place, We will provide you with additional information.

2. Recipients and categories of recipients to whom We transfer Personal Data

Kustom will transfer your Personal Data for the respective purposes and limited to the extent necessary to the recipients and categories of recipients listed below:

(a) Service providers (external): We rely on third-party service providers, to provide services on Our behalf and will share your Personal Data with them for the provision of the services. Our service providers are contractually obligated to process such Personal Data on behalf of Kustom under appropriate instructions as necessary for the respective processing purposes and to appropriately protect your Personal Data. Our service providers may not otherwise process or share your Personal Data, except as permitted by law. These service providers include IT service providers (e.g., cloud service providers like Amazon AWS, which we use to host and run the Kustom Checkout; delivery management solutions (e.g., nShift) which we use to make shipping methods available, address registry providers (e.g., Loqate) which we use to verify your address, and AI service providers which We use to generate personalized product recommendations). Detailed information is accessible upon request under the contact details provided in section 8 below.

(b) Payment Service Providers (external): We transfer your Personal Data to third-party payment service providers, which will handle your payment process in order to fulfill Our contract with you and to handle your payment process. As outlined above in section A.1, this Privacy Notice does not apply to the processing of Personal Data by the payment service providers.

We share your Personal Data with payment service providers listed in **Appendix 2 "Payment Service Providers"** annexed to this Privacy Notice.

(c) Merchants - Webshop Operator (external): We transfer your Personal Data to third-party Merchants on whose Webshop you placed an order or with whom you have made an in-person payment and who have implemented Our Kustom Checkout or MPOS in

order to (i) fulfill Our contract with you and to process your order; (ii) maintain our customer service vis-à-vis the Merchants; (iii) provide the Merchants with statistics and analytics. As outlined above in section A.1, this Privacy Notice does not apply to the processing of Personal Data by the Merchants.

(d) Delivery Experience Provider - Independent Data Controller: Where delivery functionality is active within the Kustom Checkout, Kustom transfers your Personal Data to Ingrid AB, Sveavägen 34, 111 34 Stockholm, Sweden ("Ingrid"), which provides integrated delivery experience services within the Kustom Checkout, including delivery option display and selection, consumer address recognition, post-purchase order tracking and notifications, and returns management.

Ingrid receives and processes your Personal Data as an independent data controller, not as a service provider acting on Kustom's behalf. The categories of Personal Data transferred to Ingrid include address data, basket contents, session identifiers, consumer delivery preferences, order reference data, and contact details, to the extent necessary for Ingrid to provide the above services.

Ingrid is independently responsible for its own compliance with applicable data protection law in respect of such processing. Ingrid's privacy policy, which describes how Ingrid processes your Personal Data and the rights available to you in that context, is accessible via a link within the Kustom Checkout at the point of delivery selection as well as on Ingrid's website.

(e) Governmental authorities, courts, and similar third parties that are public bodies as well as external advisors as required or permitted by applicable law, in order to: (i) ensure compliance with applicable laws; (ii) respond to governmental inquiries or requests from public authorities; (iii) comply with valid legal process; (iv) protect the rights, privacy, safety or property of Kustom, employees, third-parties or the public; (v) permit Us to pursue available remedies or limit the damages that We may sustain; (vi) enforce Our Kustom Checkout's Terms of Use (www.kustom.co); and (vii) respond to an emergency. Such data transfers are based on Art. 6 (1) (c) or (f) GDPR.

Within Kustom's sphere of controllership any access to your Personal Data in relation to your use of the Kustom Checkout is restricted to those individuals who have a 'need to know' in order to fulfill their job responsibilities.

3. Cross-border data transfers

Some of the recipients of your Personal Data are located or have relevant operations outside of the EEA (namely, the USA and the UK), where the data protection laws may provide a different level of protection compared to the laws in your jurisdiction. We will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law.

By way of entering into appropriate data transfer agreements based on the Standard Contractual Clauses (2021/914/EU) as referred to in Art. 46 (2) (c) GDPR, or by other adequate means, such as data transfers to recipients which are certified under the EU-U.S. Data Privacy Framework, which are accessible upon request under the contact details provided in section 8 below, We have established that all recipients located outside the EEA will provide an adequate level of protection for the Personal Data and that appropriate technical and organizational security measures are in place to protect Personal Data against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing. Any onward transfer (including to

Our affiliates outside the EEA) is subject to appropriate onward transfer requirements as required by applicable law.

4. **Storage period**

Your Personal Data are stored by Kustom and/or Our service providers, strictly to the extent necessary for the performance of Our obligations to you as well as the performance of the service providers' obligations to Us and strictly for the time necessary to achieve the purposes for which the Personal Data are processed, in accordance with applicable data protection laws.

When Kustom and/or Our service providers no longer need to process your Personal Data, the Personal Data will be erased from the systems and/or records and/or steps will be taken to properly anonymize the Personal Data so that you can no longer be identified from the Personal Data. However, We and/or Our service providers need to keep your information to comply with legal or regulatory obligations to which Kustom and/or Our service providers are subject. Further, if a judicial action is initiated, the Personal Data will be stored until the end of such action, including any potential periods for appeal.

To the extent that specification is possible, please find detailed information in **Appendix 1 "Personal Data"** annexed to this Privacy Notice.

5. **Details on the Cookies and Similar Technologies used on the Website, the legal bases, retention periods and recipients of the data**

We only use strictly necessary cookies and similar technologies, which are necessary to visit the website and use the website's features. We use these cookies and similar technologies to the extent that they are necessary to enable the website features that you have requested. If you disable essential cookies and similar technologies, the functionality of the Website will be affected.

You can find details on the Cookies and Similar Technologies used on the Website in **Appendix 3 "Strictly necessary Cookies and Similar Technologies"** annexed to this Privacy Notice. As outlined above in section 1, you can find information on the categories of Personal Data processed, the purposes for which We process these categories of Personal Data, and the legal bases for processing of your Personal Data in **Appendix 1 "Personal Data"** to this Privacy Notice.

6. **Your rights**

If you have declared your consent to any Personal Data processing activities, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

Under the conditions set out under applicable data protection law (e.g., the GDPR), you may have the following rights, which you may exercise by contacting Us as stated in section 8 below:

(a) Right of access: You have the right to obtain confirmation from Us as to whether or not Personal Data concerning you is processed, and, where that is the case, to request access to the Personal Data. The access information includes – inter alia – the purposes of the processing, the categories of Personal Data concerned, and the recipients or categories of recipients to whom the Personal Data have been or will be disclosed. However, this is not an absolute right, and the interests of other individuals may restrict your right of access.

You also have the right to obtain a copy of the Personal Data undergoing processing. For further copies requested by you, We may charge a reasonable fee based on administrative costs.

(b) Right to rectification: You have the right to obtain rectification of inaccurate Personal Data concerning you from Us. Depending on the purposes of the processing, you have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

(c) Right to erasure ("right to be forgotten"): Under certain circumstances, you have the right to obtain the erasure of Personal Data concerning you from Us and We may be obliged to erase such Personal Data.

(d) Right to restriction of processing: Under certain circumstances, you have the right to obtain the restriction of processing your Personal Data from Us. In this case, the respective data will be marked and may only be processed by Us for certain purposes.

(e) Right to data portability: Under certain circumstances, you have the right to receive the Personal Data concerning you, which you have provided to Us, in a structured, commonly used and machine-readable format, and you have the right to transmit those data to another entity without hindrance from Us.

(f) **Right to object: You have the right to object, on grounds relating to your particular situation, at any time to processing of your Personal Data by Us which is based on the necessity of processing for the purposes of the legitimate interests pursued by Us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of Personal Data, in particular if you are a child, including profiling based on those provisions. We will no longer process your Personal Data unless We demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.**

Moreover, if your Personal Data are processed for direct marketing purposes, where such is permitted without your prior consent, you have the right to object at any time to the processing of Personal Data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. In this case your Personal Data will no longer be processed for such purposes by Us.

(f) Right to lodge a complaint: In addition to the rights set out above, you also have the right to lodge a complaint with the competent data protection supervisory authority.

7. Personal Data required to enter into a contract

You only have to provide Personal Data that is required for Us to establish and implement a business relationship with you, or that We are legally obligated to collect. Such Personal Data are marked as mandatory in the respective forms of the Kustom Checkout. Without such Personal Data, We cannot conclude the requested contract, or – should you remove such Personal Data at a later stage – We will no longer be able to execute an existing contract and may have to terminate it.

Personal Data that are not marked as mandatory in the corresponding forms of the Kustom Checkout do not have to be provided.

We can provide Our services (i.e., the Kustom Checkout and MPOS) and/or conclude a contract only if you provide Us with, as applicable, your name, email address, billing address, shipping address,

telephone number and in some cases also, date of birth, title/gender and national ID (in case appliable in your jurisdiction).

8. **How to contact Us**

If you have any questions etc. about or in connection with this Privacy Notice or would like to complain about Our handling of your Personal Data or exercise any of your rights (see section 6 above), please contact Us by using the following contact details:

Ordinary mail: Kustom AB
Sturegatan 6, 114 35 Stockholm, Sweden
Email: dataprivacy@kustom.co

9. **Changes to the Privacy Notice**

This Privacy Notice may require an update from time to time – e.g., due to the implementation of new technologies or the introduction of new services or features. We reserve the right to change or supplement this Privacy Notice at any time. We will publish the changes on www.kustom.co and/or inform you accordingly (e.g., via email).

Appendix 1

Personal Data

We process the following Personal Data in connection with your use of the Kustom Checkout and MPOS, as detailed in the following table:

Purposes of the processing	Categories of Personal Data	Legal basis for the processing	Storage period
To operate Kustom Checkout We process Personal Data to provide the Kustom Checkout. Kustom Checkout allows users to input information needed by Merchants to fulfil orders, select preferences such as shipping methods and delivery options, and enable secure and convenient payment through a variety of payment methods offered by different payment service providers. Information on the processing of Personal Data in the context of the Autofill feature is provided separately below.	"**Master Data**", consisting of: ● Name ● Email address; ● Billing address; ● Shipping address; ● Telephone number; ● Date of birth; ● Title/Gender; and ● National ID (where applicable). "**Order data**", consisting of: ● Cart details (i.e., specific information regarding the items placed in the shopping cart such as product name and chosen shipping method); ● Carrier/Shipping details (i.e., specific information relating to the shipping method); and ● Payment method. **"Technical Data",** consisting of: ● IP-address; and ● Browser information / User agent (i.e., a string of text sent by web browsers and other applications to web servers to provide information about the browser, operating system, and the version being used. This information helps the server identify the browser, problems/ bugs and tailor the content accordingly). "**Correlation ID"** is a unique identifier used to track and correlate interactions.	Required for the performance of a contract (Art. 6 (1) (b) GDPR).	The Personal Data are stored as long as they are required for its purpose. The Personal Data will be deleted after the storage is no longer necessary, unless there are statutory storage requirements or limitation periods must be observed.

Purposes of the processing	Categories of Personal Data	Legal basis for the processing	Storage period
Auto-fill feature In order for you to have a smooth and friction free shopping experience We will remember some information about you and use that information to Autofill different forms with your information during your shopping via the Kustom Checkout. Please refer to section B.2 above for detailed information about the Autofill feature.	● Master Data (as defined above).	. Legitimate interests (to provide a convenient purchase experience by enabling autofill of relevant customer and order information for future purchases through the Kustom Checkout) (Art. 6 (1) (f) GDPR).	The Personal Data are stored as long as they are required for its purpose. The Personal Data will be deleted after the storage is no longer necessary, unless there are statutory storage requirements or limitation periods must be observed.

To operate Express checkout as part of Kustom Checkout When You initiate a purchase via Express Checkout, the payment service provider collects Your Personal Data and authorises the payment, and subsequently transfers Personal Data to Kustom that in turn transfers the data to the Merchant so it can fulfill Your order.	• Master data (as defined above); and • Order data (as defined above).	Required for the performance of a contract (Art. 6 (1) (b)GDPR).	The Personal Data are stored as long as they are required for its purpose. The Persona Data will be deleted after the storage is no longer necessary, unless there are statutory storage requirements or limitation periods must be observed.

Purposes of the processing	Categories of Personal Data	Legal basis for the processing	Storage period
To Facilitate Payments Through External Payment Service Providers We process Personal Data to facilitate payments through third-party payment service providers selected by you during checkout. These providers handle and transfer your Personal Data as necessary to complete the payment process.	• Master Data (as defined above); and • Order Data (as defined above).	Required for the performance of a contract (Art. 6 (1) (b) GDPR)	The Personal Data are stored as long as they are required for its purpose. The Personal Data will be deleted after the storage is no longer necessary, unless there are statutory storage requirements or limitation periods must be observed.
To verify Your address Kustom Checkout uses third party address registries to validate the street name, building/street number, postal code and city provided by You.	• Billing address; and • Shipping address.	Legitimate interests (to verify address accuracy, prevent fraud, ensure delivery, and enhance transaction security) (Art. 6 (1) (f) GDPR).	The Personal Data are stored as long as they are required for its purpose. The Personal Data will be deleted after the storage is no longer necessary, unless there are statutory storage requirements or limitation periods must be observed.

Purposes of the processing	Categories of Personal Data	Legal basis for the processing	Storage period
To improve Our service To continuously improve Our services to better serve Our users, We may analyze usage patterns to identify trends and improvement areas, test new features to implement and evaluate service improvements, detect and resolve issues by identifying, understanding, and addressing bugs and technical issues, and optimize performance by monitoring system performance to maintain an efficient and reliable service.	• Master Data (as defined above); • Order Data (as defined above); • Technical Data (as defined above); and • Correlation ID (as defined above).	Legitimate interests (to enhance services, identify trends, test improvements, resolve issues, and optimize performance) (Art. 6 (1) (f) GDPR).	The Personal Data are stored as long as they are required for its purpose. The Personal Data will be deleted after the storage is no longer necessary, unless there are statutory storage requirements or limitation periods must be observed.
To produce statistics and analysis To produce statistics and analysis, We process Personal Data to generate insights that help Us understand the broader performance and trends associated with Our services. This includes tracking adoption trends by monitoring how Our services are being adopted and used across various markets and demographics. We provide Merchants with anonymized and aggregated statistics about user interactions	• Master Data (as defined above); • Order Data (as defined above); • Technical Data (as defined above); and • Correlation ID (as defined above).	Legitimate interests (to understand service performance, support Merchants, fulfill legal requirements, and optimise operations) (Art. 6 (1) (f) GDPR).	The Personal Data are stored as long as they are required for its purpose. The Personal Data will be deleted after the storage is no longer necessary, unless there are statutory storage requirements or limitation periods must be observed.

to inform their business strategies. Additionally, We generate reports to fulfil legal or regulatory requirements and use aggregated data to improve internal efficiency, resource allocation, and cost management.			
To protect legal rights and defend against claims To protect Kustom from legal claims and safeguard Our legal rights, We process your Personal Data.	• Master Data (as defined above); • Order Data (as defined above); • Technical Data (as defined above); and • Correlation ID.	Legitimate interests (to protect legal rights and defend against claims) (Art. 6 (1) (f) GDPR).	As long as necessary for the fulfilment of legal requirements and/or for legal defence.
To provide Customer support To properly answer your inquiries about Our service, privacy related questions or other questions you may have.	• Master Data (as defined above); • Order Data (as defined above); • Technical Data (as defined above); and • Correlation ID.	Legitimate interests (to enhance Customer satisfaction by properly answering inquiries from Customers) (Art. 6 (1) (f) GDPR).	The Personal Data are stored as long as they are required for its purpose. The Personal Data will be deleted after the storage is no longer necessary, unless there are statutory storage requirements or limitation periods must be observed.

Purposes of the processing	Categories of Personal Data	Legal basis for the processing	Storage period
To maintain Our Customer service vis-à-vis the Merchant. To properly answer inquiries from the Merchant regarding your orders and to ensure We provide consistent and effective Customer service in relation to the Merchant.	• Master Data (as defined above); • Order Data (as defined above); • Technical Data (as defined above); and • Correlation ID.	Legitimate interests (to enhance Merchant satisfaction by properly answering inquiries from Merchants) (Art. 6 (1) (f) GDPR).	The Personal Data are stored as long as they are required for its purpose. The Personal Data will be deleted after the storage is no longer necessary, unless there are statutory storage requirements or limitation periods must be observed.
To perform assessments regarding fraud prevention To safeguard against fraudulent activity and enhance fraud prevention measures, actions are taken for the purposes of fraud scoring, prevention, and detection. This includes blocking probably fraudulent transactions to protect users, Merchants, and Our systems from harm, as well as analyzing transaction patterns and behaviors to enhance Our fraud detection models and prevent future fraudulent activity, ensuring consistent and effective fraud prevention measures.	• Master Data (as defined above); • Order Data (as defined above); • Technical Data (as defined above); • Correlation ID (as defined above); and • The fact whether a transaction has been declined or not.	Legitimate interests (to protect Our business and Customers by identifying and mitigating potential fraud risks) (Art. 6 (1) (f) GDPR).	The Personal Data are stored as long as they are required for its purpose. The Personal Data will be deleted after the storage is no longer necessary, unless there are statutory storage requirements or limitation periods must be observed.

Purposes of the processing	Categories of Personal Data	Legal basis for the processing	Storage period
To enable personalized recommendations We process Personal Data to provide personalized product recommendations in connection with a purchase, including tailoring the products and services displayed to you based on your interactions and preferences.	• Email address; • Cart details (as defined above); and • Demographic information (gender, age, and geographical location).	Legitimate interests (to enable personalized product recommendations and thereby enhancing the Customer experience) (Article 6 (1) (f) GDPR).	The Personal Data are stored as long as they are required for its purpose. The Personal Data will be deleted after the storage is no longer necessary, unless there are statutory storage requirement or limitation periods must be observed.
To operate the MPOS We process Personal Data to send a digital receipt to you in connection with your purchase using our MPOS-application.	● Master Data (as defined above); ● Order Data (as defined above); and ● Correlation ID.	Required for the performance of a contract (Art. 6 (1) (b) GDPR).	The Personal Data are stored as long as they are required for its purpose. The Personal Data will be deleted after the storage is no longer necessary, unless there are statutory storage requirements or limitation periods must be observed.

To link purchase data across Kustom's services If you have previously made a purchase via card through Kustom Checkout, Kustom can re-identify you when you subsequently make a purchase using Kustom's MPOS-application. In such case, Kustom may link your transactions across the Kustom Checkout and MPOS in order to maintain a unified purchase history and improve the customer experience. The Merchant is an independent data controller in respect of any further processing of your Personal Data. For information on how a Merchant processes your Personal Data, please refer to that Merchant's privacy notice.	• Purchase history; • The payment account reference (PAR) of your payment card.	Legitimate interests (to link transactions across Kustom Checkout and MPOS in order to maintain a unified purchase history and improve the customer experience) (Art. 6 (1) (f) GDPR).	The Personal Data are stored as long as they are required for its purpose. The Personal Data will be deleted after the storage is no longer necessary, unless there are statutory storage requirements or limitation periods must be observed.

Appendix 2

Payment Service Providers

Depending on the purpose of the processing for which We use each service provider, we share certain of your Personal Data (as necessary) with the following Payment Service Providers (for service providers acting as processors please refer to 2(b) of the Detailed Notice above):

Stripe Payments Europe Limited, 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, D02 H210, Ireland.

Payment Service Providers solely acting as independent data controllers:

- Resurs Bank AB (publ), Björkavägen 111, 250 24 Helsingborg

- PayPal Pte. Ltd., 5 Temasek Boulevard #09-01, Suntec Tower Five, Singapore 038985

Kustom

Appendix 3

Strictly necessary Cookies and Similar Technologies

Strictly necessary Cookies and Similar Technologies are required to use the functionalities of the Kustom Checkout. We will use these Cookies and Similar Technologies insofar as they are necessary to enable the Kustom Checkout functions specifically requested by you. If you disable strictly necessary Cookies and Similar Technologies, the functionality of the Kustom Checkout will be affected.

Strictly necessary Cookies and Similar Technologies do not require your consent. The legal basis for the processing of personal information through the use of strictly necessary Cookies and Similar Technologies is legitimate interest(Art. 6 (1) lit. f GDPR).

Cookie	Purpose	Expiry	Provider	Party
name kdid	Stores a user identifier (arbitrary number) used to autofill user information and remember if a user doesn't want to be pre-filled on this device or browser.	730 days from your last confirmed purchase with Kustom	Kustom	1st Party
kustom_m did	Stores a user identifier (arbitrary number) used to autofill user information and remember if a user doesn't want to be pre-filled. Expiry is governed by the _kustom_mdid_expiry cookie.	Does not expire but uses kustom_mdid_ expiry cookie to determine the effective expiry date	Kustom	1st Party
kustom mdid_expi ry	Stores the last allowed use time for the kustom_mdid cookie. Updated at last confirmed Kustom purchase, and used to determine when kusto_mdid should be considered expired.	No expiry	Kustom	1st Party