

Privacy Policy

1 Introduction

In this privacy statement you can read about what personal data the 33report.eu service (the “Service”) collects, how it is processed and what your rights as a data subject are. The Service has two features, a Ledger, and a Ticket Engine.

1.1 Processing responsibilities

Nordic Regtech Solutions AS, a Norwegian company with registration number 927069687 (“NRS”) is the Controller of the personal data processed in this Service. If you have any questions towards this policy or personal data in the Service, please contact privacy@33report.eu

2 Policy statement

The Service shall not contain directly identifiable personal data in the ticket content stored in the Ledger, and endeavors to minimize personal data in relation to subscription and Ticket Engine use to the extent practically possible.

3 When does the Service collect and process personal data?

The Service collects and processes personal data in three cases:

- if you visit the website
- If you sign up for news/updates
- If you subscribe and use the Service

3.1 Visiting the website

3.1.1 Cookies

Our website is hosted on a website platform that uses cookies to enable certain functionality.

Cookies are small text files that are placed on your computer when your browser visits a website. Cookies are normally divided into two categories, firstly essential cookies, which are necessary to make the website function properly, and non-essential cookies, (typically including third party cookies) which are not strictly necessary, and which you as a user can choose to accept or not.

33report.eu only uses essential cookies, so we are not asking you to consent to anything regarding cookies.

You can read more about cookies in our cookie policy, found at 33report.eu/download

3.1.2 Statistics from Web server

33report.eu uses logs from our web server to generate statistics on visits out website / the Service. These statistics allow us to ensure stable and secure operations for existing and future version of the Service. The information contains various variables, such as which page you have visited, the date and time of visit as well as technical information about your device.

The basis for processing statistics is Article 6 (1) of the General Data Protection Regulation

(GDPR). 1 letter f, which allows us to process information necessary to safeguard a legitimate interest that outweighs the consideration of the individual's privacy. The legitimate interest is to improve and further develop information on our website, as well as keeping its operations stable and secure.

3.2 If you sign up for news/updates

At the 33report landing page there is an option to sign up for news/updates. You sign up by consenting to the Service using your email for to send you updates, and then submitting this email.

The Service will then store your email address as submitted by you for one year and send you updates as they are become available. We will not share your email address submitted for news/updates with any other party.

We advise using a non-personal email address to the extent such are available to you. If you choose to use a personal e-mail address, the basis for processing statistics is Article 6 (1) of the General Data Protection Regulation (GDPR). 1 letter a, consent.

You can withdraw you consent at any time by sending an email to info@33report.eu

3.3 If you subscribe to the service

If you subscribe to the Service, you enter into an agreement with NRS. To be able to enter into the agreement and pay subscription fees, as well as for us to know who you are and provide you access to the service, some information is necessary.

The user information, access management and subscription details are kept in a separate database related to the Ticket Engine. Once tickets are written to the Ledger they only contain a token reference to an Entity-related email address, stored in the Ticket Engine database. Per policy this email address shall be non-personal. If a subscriber (contrary to policy) uses a personal email address this can indirectly be linked to ticket data in the Ledger.

We collect three different email addresses for the Ticket Engine database:

The first is related to the role Subscriber. This is used for administrative purposes related to the subscription agreement, such as invoicing, renewal and user management, as described in 3.4

The second is related to the role Entity. This shall be a non-personal email, and a tokenized reference to it will be stored to the Ledger (thereby preventing the Ledger from containing personal data). This is used for notifications from the service as such, as well as generating the token reference appended to a ticket when written in the Ledger.

The third is an email address connected to the role User. This is used for the accessing and using the Service as such. References to this will be expunge from the database at the time of publishing to the Ledger.

The basis for processing statistics is Article 6 (1) of the General Data Protection Regulation (GDPR). 1 letter b, necessary for the performance of a contract.

3.4 Agreement and fees

You enter into an agreement on behalf of a regulated entity. We do however need a contact email address of the person entering into the agreement, for both contract administration, invoicing and notices concerning the Service, as described in 3.3 above.

Our invoicing service will process your invoice and store data about invoices sent, including the contact information to which it is linked and sent.

3.5 Using the service

The Service consists of a method for documenting observations of possible noncompliance in relation to PSD2 APIs, an ability to submit this observation to the providers of such APIs, (if they subscribe to the service) an ability for the providers to respond. This is contained in a Ticket Engine. In addition the Ticket Author has an ability for the ticket creator to then either withdraw or publish the ticket in a Ledger, which is a database where ticket metadata will be generally available to the community.

The Service does not allow any personal data to be contained in the content of these tickets or published in the Ledger.

For authentication and usability to the service itself however, a token is sent to the email address relating to a User. This is linked to the ticket until it is published in the Ledger. This email address, unless it is of a non-personal nature, will constitute personal data. We advise using a non-personal email address to the extent such are available to you.

4 Your rights

As a data subject you have certain rights in relation to the processing of your personal data, including but not limited to access, rectification, and the right to protest. You can read more about your rights on the homepage of your national data protection authority.

You can exercise your rights as a data subject by sending us emails to privacy@33report.eu

You are entitled to an answer without undue delay, and no later than one month.

This policy will be updated from time to time and updated versions will be published on 33report.eu/download. If you are a subscriber of the service a notice of update will be sent to you.

5 Transfers outside the EEA

We transfer personal data outside the EEA, due to the physical location of the providers of services we use for realizing the service. The legal grounds for such transfer is described below in Section 6.

6 Subprocessors

We use certain services provided by external parties to provide the Service. These will process data on our behalf as described in this policy and we are responsible towards you as a data subject for this processing. We advise you to read the privacy policy of our subprocessors, as listed below.

6.1 Website /Plattform

Our website is hosted by wix.com. Wix datacenters are located in the EU, Israel and the USA.

The legal grounds for transfer is the EU Model Standard Contractual Clauses.

You can read more about privacy on the wix platform on <https://www.wix.com/about/privacy>

6.2 Ledger

Per policy the Ledger shall not contain personal data. If we become aware of any personal data in it, we will delete the ticket (or relevant part of it).

To the extent it should contain pseudonymized personal data, the following applies.

Our ticket database is hosted on Airtable.com. The data is transferred outside the EU, to a datacenter in the USA. Airtable servers are located in the US, in data centers that are SOC 1, SOC 2 and ISO 27001 certified.

The legal grounds for transfer is the EU Model Standard Contractual Clauses.

You can read more about privacy on the Airtable platform on: <https://airtable.com/privacy>

6.3 Ticket Engine

Our Ticket engine, containing also our user, subscriber and access management database is hosted on Airtable.com. The data is transferred outside the EU, to a datacenter in the USA. Airtable servers are located in the US, in data centers that are SOC 1, SOC 2 and ISO 27001 certified.

The legal grounds for transfer is the EU Model Standard Contractual Clauses.

You can read more about privacy on the Airtable platform on: <https://airtable.com/privacy>

6.4 Invoicing

For invoicing we use fiken.no. You can read more about the fiken.no platform and its subcontractors on: <https://fiken.no/sluttbrukeravtale/datautveksling>
