

MECSEL DATA PROTECTION POLICY

Register is held by Mecsel Oy, Finland, VAT nr 0838962-0, Laitilankuja 5, FI-00420 Helsinki, FINLAND
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Mecsel is taking actions to safeguard ID integrity complying Finnish Law of person ID (523/1999), Finnish Electronic Information Security Law (516/2004), EU GDPR regulation (25.05.2018) and other Laws regulating Information security handling. Mecsel is complying also Finnish FIN-FSA Financial Supervisory Authority regulation, Finnish Client marketing association direct marketing rules, Digital Forum Finland rules and IAB direct net marketing regulations.

The only Identifying information Mecsel Oy handles is phone subscriber number of Finnish sim

Mecsel is enabling SMS text message payments in Finland from unattended POS like vending machines. Typical POS are drink/ snack vendors and food merchandisers. Mecsel routes SMS messages from operators' payments systems to the right vending machines. Consumer starts the process from own mobile phone sending SMS to Sim subscription operator. This message is diverted through Mecsel server to POS terminal. Mecsel payment device inside the POS unit gives credit to host machine enabling to make a vend. After consumer has made product choice Mecsel server is sending question to operator to get allowance to make a vend.

After the vend Mecsel server sends a message to consumer of successful vend and the final sum. This information is again routed through operator's system to subscriber's phone. In the same manner unsuccessful vend triggers a message to consumer with the message reason and that nothing is charged. Finnish Merchant using Mecsel SMS services don't get to know the whole subscriber number but only five last digits ...12345.

Location of Mecsel cloud servers

Mecsel servers are located in Finland and maintained by Valtti Oy <https://valtti.com/en/>

Handling of data has been agreed by mutual contract.

Further enquiries can be asked from Mecsel phone number +358 40 3527526 or by email to mai@mecsel.com.

Mecsel Data Protection Policy responsible is Jyrki Virtanen.

Mecsel has outsourced reporting to Finnish FIN-FSA Financial Supervisory Authority to Mepay Oy

Read more on <http://www.mepay.fi/en/>

THIRD PARTY REGISTERS

Mecsel Oy is routing transaction information to unattended POS. Transactions are rerouted to following payment scheme suppliers:

- 1.) MobilePay payments, Denmark
- 2.) mePay™ app, Mepay Oy, Finland
- 3.) Closed loop payment, Internal organisation systems
- 4.) cPos student card system, Unitec ApS, Denmark
- 5.) Tine mejeri SA, Norway
- 6.) Nets PSP, Payment Service Provider, Finland, Denmark and Norway, EMV certified
- 7.) Seitatech Payment services Oy, Finland, EMV certified

Third party companies are handling Identification information. This Identification information is not disclosed to Mecsel Oy.

1.) Mobilepay is originally developed by Danish Danske Bank. MobilePay is the only actor connected to consumer direct. MobilePay send the payment information to Mecsel server to be routed to each POS.

2.) mePay™ app is hosted by Mepay Oy. Mepay handles ID information of consumers registered to the system. This Identification information is not disclosed to Mecsel Oy.
Mepay Oy is not handling EMV card data. Consumer register card data to PSP Nets. Mepay Oy and Nets are communicating consumer information by security tokens.

3.) Closed Loop systems are working with internal company cards, like RFID access cards. Vend transaction is started with random card serial number. Mecsel Oy has no access to identities behind the card nr, which is administrated by the host company

4.) cPos is a Danish nationwide student card system. Mecsel communicates to the system with undisclosed security key, The system is hosted by Unitec ApS, Denmark

5.) Mecsel Oy is routing Norwegian Tine SA dairy's transactions to food merchandises selling milk based food products to students.
Vend transaction is started with RFID Closed Loop card. Tine SA is hosting the consumer ID data.
This Merchant has also open systems using EMV credit and debit cards. Card ID information is hosted by Nets Norway