



# Open Banking Europe: Cookie Policy

Open Banking Europe - providing collaborative services to support  
PSD2 XS2A, in partnership with the financial industry

**Version:** 002-000  
**Date:** 18 January 2021  
**Classification:** Public

This document is the property of OBE S.A.S. The information contained herein is confidential and SHALL NOT be reproduced or distributed without OBE S.A.S.'s prior written agreement.

## Document Change History

Version	Date	Changes
000-001	06 January 2020	Internal draft.
000-002	13 January 2020	Internal draft. Changes following internal review.
000-003	17 January 2020	Internal draft. Changes following internal review.
000-004	28 January 2020	Internal draft. Changes following internal review.
000-005	29 January 2020	Internal draft. Changes following internal review.
001-000	05 February 2020	Full public release.
002-000	18 January 2021	Full public release. All references to PRETA S.A.S. replaced by OBE S.A.S.

# Contents

Introduction.....	4
1. In General.....	4
2. Cookies .....	4
3. Purposes for Which the Directory Owner Uses Your Personal Data .....	5
4. Legal Basis for Processing Your Personal Data .....	6
5. Recipients.....	6
6. Quality Assurances .....	6
7. Your Rights.....	7

# Cookie Policy

## Introduction

This Cookie Policy governs the use of cookies on the OBE website (<https://www.openbankingeurope.eu/>) and on the platforms where the OBE Services are provided (hereinafter: “**Website**”). by the Directory Owner (hereinafter: “**Directory Owner**”, “**we**”, “**us**”, “**our**”).

A cookie is a small text file that the Website saves on your computer or mobile device when you visit the Website, and which contains certain information and sometimes personal data. It enables the Website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the Website or browse from one page to another.

If you want general information on how we process your personal data other than the processing through cookies, including in relation to your communication with us via email, telephone, or fax and in relation to your registration on our Website, please refer to our Privacy Policy.

**By continuing to use the Website after having been informed of the use of cookies, you acknowledge that you have read this Cookie Policy carefully and that you agree with it without reservation. You may, however, at all times change your cookie preferences through the cookie settings.**

## 1. In General

- 1.1 Your personal data is processed by the Directory Owner, operating as manager and owner of the OBE Directory. The Directory Owner is OBE S.A.S. a company registered under RCS Paris 880 143 896, VAT number FR 35 880 143 896, having its registered office at 14 Rue de Dunkerque, 75010 Paris, France, or any other entity substituting OBE S.A.S. The Directory Owner can be contacted via email at [info@openbankingeurope.eu](mailto:info@openbankingeurope.eu).
- 1.2 Any notion starting with a capital shall be defined by explicit reference in this Cookie Policy. Where possible given the context, singular words shall be interpreted as also including the plural and vice versa.
- 1.3 Where reference is made to certain laws or regulations, such reference shall also include any change, replacement, or annulment of said laws or regulations, including any related executive decisions.
- 1.4 The Directory Owner reserves the right to modify, change, or amend this Cookie Policy at its own discretion and from time to time. Such modification, change, or amendment shall be communicated via the Website. If you do not accept the modifications, changes, or amendments, you are to inform us by sending an email to [info@openbankingeurope.eu](mailto:info@openbankingeurope.eu). If we do not receive such an email from you within three (3) business days after the changes to the Cookie Policy have been announced in a visible manner on our Website, you will be deemed to have unambiguously accepted all such changes.

## 2. Cookies

- 2.1 You can control and/ or delete cookies being placed by configuring your browser as such. For more details, see [aboutcookies.org](http://aboutcookies.org). You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site, and some services and functionalities may not work or stop working properly.

To learn how to opt out of behavioural advertising delivered by Network Advertising Initiative member companies, please visit the Network Advertising Initiative and Digital Advertising Alliance. You may download the AppChoices app to opt out in mobile apps. If you opt out from interest-based advertising, you may see advertising that is not relevant to you. At present, there is no industry standard for recognising Do Not Track browser signals, so we do not respond to them.

2.2 When you visit the Website, the Directory Owner places a number of cookies. Most data pertaining to these cookies, their placement and use identify you, and the Directory Owner uses them to gain insight in how you and other visitors use the Website by gathering statistical and usage data, enabling the Directory Owner to provide a better user experience on the Website.

2.3 The Directory Owner knows about the following most important cookies being used on the Website:

- Analytical and statistical cookies

**Google Analytics:** The cookies placed by Google are the “\_ga”- (2-year lifespan), as well as the “\_gid”/“\_gat”-cookie (session or 1-day lifespan). They enable the Directory Owner to learn information about our users’ use of the Website, such as the time of visit, the pages viewed, whether the user has visited the Website before, and the website visited prior to visiting the Website. For further information please see:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?csw=1>

2.4 You may at all times withdraw your consent with the Directory Owner’s use of cookies. To exercise this right, it suffices to delete the cookies, which have been placed on your device. To do so, you are kindly asked to refer to the appropriate instructions of your browser manufacturer, as listed above.

### 3. Purposes for Which the Directory Owner Uses Your Personal Data

3.1 The Directory Owner processes your personal data to perform statistical analyses so that we may improve our Website, products and services or develop new products and services.

3.2 The Directory Owner processes your personal data to provide you in a personalised and efficient way with the products and services, via the Website.

3.3 The Directory Owner processes your personal data for marketing purposes, i.e. to provide you with targeted communications, promotions, offerings, and other advertisements of the Directory Owner regarding our products and services.

3.4 The Directory Owner may process your personal data for informing any third party in the context of a possible merger with, acquisition from/by or demerger by that third party, even if that third party is located outside the EU.

3.5 The Directory Owner may process your personal data for the preservation of the legitimate interests of the Directory Owner, its partners or a third party if and when your registration with, or use of, the Website can be considered (a) a violation of any applicable terms of use or the intellectual property rights or any other right of a third party, (b) a threat to the security or integrity of the Website, (c) a danger to the Website or any of the Directory Owner’s or its subcontractors’ underlying systems due to viruses, Trojan horses, spyware, malware or any other form of malicious code, or (d) in any way hateful, obscene, discriminating, racist, slanderous, spiteful, hurtful, or in some other way inappropriate or illegal.

## 4. Legal Basis for Processing Your Personal Data

- 4.1 For processing your personal data under the conditions outlined in this Cookie Policy, but with the exception of functional cookies, the Directory Owner as the responsible party asks for **your consent**.

## 5. Recipients

- 5.1 The Directory Owner may share personal data with third party business partners when this is necessary to provide our services to you. Other than this, we do not send your personal data in a directly identifiable manner to any third party without your explicit permission to do so.
- You understand, however, that our use of analytical and statistical cookies may imply that the third-party providers of those cookies may obtain certain information about you, including about your surfing behaviour. You can find more information in the respective policies of those providers.
- 5.2 The Directory Owner relies on third-party processors to provide you the Website as well as to process your personal data on our behalf. These third-party processors are only allowed to process your personal data on behalf of the Directory Owner upon explicit written instruction of us. The Directory Owner warrants that all third-party processors are selected with due care and are obliged to observe the safety and integrity of your personal data.
- Your use of our Website implies that your personal data are transferred to the United States of America. The United States of America has received an adequacy decision of the European Commission (Commission Implementing Decision (EU) 2016/1250) and is as such considered to be a country which offers adequate protection for your personal data.

## 6. Quality Assurances

- 6.1 The Directory Owner does its utmost best to process only those personal data which are necessary to achieve the purposes listed under the purpose for processing.
- 6.2 Your personal data are only processed for as long as needed to achieve the purposes which are described above or up until such time where you withdraw your consent for processing them. Note that withdrawal of consent may imply that you can no longer use the whole or part of the Website. The Directory Owner will de-identify your personal data when they are no longer necessary for the purposes outlined in the purpose for processing, unless there is:
- an overriding interest of the Directory Owner or any other third party in keeping your personal data identifiable;
  - a legal or regulatory obligation or a judicial or administrative order that prevents the Directory Owner from de-identifying them.
- 6.3 The Directory Owner will take the appropriate technical and organisational measures to keep your personal data safe from unauthorised access or theft as well as accidental loss, tampering, or destruction. Access by personnel of the Directory Owner or its third-party processors will only be on a need-to-know basis and subject to strict confidentiality obligations. You understand, however, that safety and security are best efforts obligations only, which can never be guaranteed.

## 7. Your Rights

- 7.1 You have the right to request access to all personal data processed by the Directory Owner pertaining to you. We reserve the right to charge an administrative fee for multiple subsequent requests for access that are clearly submitted for causing nuisance or harm to us.
- 7.2 You have the right to ask that any personal data pertaining to you that are inaccurate, are corrected free of charge. If a request for correction is submitted, such request shall be accompanied of proof of the flawed nature of the data for which correction is asked.
- 7.3 You have the right to withdraw your earlier given consent for processing your personal data.
- 7.4 You have the right to request that personal data pertaining to you will be deleted if they are no longer required in light of the purposes which are outlined above or if you withdraw your consent for processing them. However, you need to keep in mind that a request for deletion will be evaluated by the Directory Owner against:
- overriding interests of us or any other third party;
  - legal or regulatory obligations or administrative or judicial orders which may contradict such deletion.
- Instead of deletion you can also ask that we limit the processing of your personal data if and when (a) you contest the accuracy of that data, (b) the processing is illegitimate, or (c) the data are no longer needed for the purposes which are outlined above, but you need them to defend yourself in judicial proceedings.
- 7.5 You have the right to oppose the processing of personal data if you are able to prove that there are serious and justified reasons connected with the particular circumstances that warrant such opposition.
- 7.6 You have the right to receive from us in a structured, commonly used, and machine-readable format all personal data you have provided to us.
- 7.7 If you wish to submit a request to exercise one or more of the rights listed above, you can send an email to [info@openbankingeurope.eu](mailto:info@openbankingeurope.eu) for all data subject rights matters. An email requesting to exercise a right shall not be construed as consent with the processing of your personal data beyond what is required for handling your request. Such request should clearly state and specify which right you wish to exercise and the reasons for it if such is required. It should also be dated and signed and accompanied by a digitally scanned copy of your valid identity card proving your identity.
- The Directory Owner will promptly inform you of having received this request. If the request proves valid, we shall notify it as soon as reasonably possible and at the latest thirty (30) days after having received the request.
- If you have any complaint regarding the processing of your personal data by the Directory Owner, you may always contact us via the email address mentioned in the first paragraph of this clause. If you remain unsatisfied with our response, you are free to file a complaint with the competent data protection authority. For a list of national data protection authorities, visit [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).