

Privacy Policy for Skandinaviska Enskilda Banken AB (publ) Oslofilialen

We always process the information that our customers entrust us with in a careful and responsible manner. This privacy policy explains how we collect and use your personal data. It also describes what rights you have when it comes to your personal data.

The personal data controller is:
Skandinaviska Enskilda Banken AB (publ) Oslofilialen
Org.nr. 971 049 944

This Privacy Policy was last updated on 1 October 2021

What constitutes personal data?

Personal data is information that can be directly or indirectly linked to a living person. For example, this may include name and personal ID number, but also other data specific to a person's physical, genetic, psychological, financial, cultural or social identity. Data such as your IP address or your recorded voice may also be considered personal data if it can be linked to you.

Sensitive personal information means information that, for example, reveals membership in a trade union or information about health.

What is processing?

The processing of personal data includes all handlings taken with the information, regardless of whether they are performed automatically or not. Common examples of data processing include collection, recording, manipulation, storage, transfer and deletion.

Who do we collect information about?

We collect information about you if you have entered into, or want to enter into, an agreement with us. This may be as a customer, guarantor or mortgagor, for example. Alternatively, we sometimes need to collect information about you if you are a payer, trustee, director, proxy, representative, authorised signatory, certain type of contact person or actual principal. You can read more about when we collect this type of information in the next section.

What information do we collect, where does it come from and how do we collect it?

- *Information you provide to us*
We collect information about you that you have directly or indirectly provided to us. For example, this could be in relation to a statement of an application, when you enter into an agreement with us or when we otherwise administer an agreement.
We may also store information we obtain or that emerges when you contact us. For example, we record certain phone calls. We may also store communications we receive

by e-mail. In addition, we may store information from your use of online banking, our mobile app or other online services. For example, this could be information about how you use our services, your purchases and payments, your IP address or your geographical location.

- *Information we collect about you*

In addition to the information you provide to us, we may collect information about you from other sources. This applies, for example, when we;

- regularly update information about name and contact details via the Population Register,
- retrieve information from credit rating agencies,
- carry out checks that we are required to perform in order to prevent our products and services being used for money laundering, by retrieving information from the sanctions lists of international organisations

- *Especially on trading in financial instruments (securities).*

In accordance with securities trading legislation, SEB is obliged, when we act as an investment firm, to make audio recordings, as well as to document other customer communications (e-mail, chat, etc.) in connection with the provision of investment services and related services, and to store such documentation. Further rules on sound recording follow from SEB's general terms and conditions for trading in financial instruments which are available on www.seb.no

Why and on what basis do we process your personal data?

We process your personal data for specific purposes and when we have a legal reason for doing so.

- *To prepare and administer agreements*

The most common reason we process your personal data is to document, administer and fulfil agreements we have with you. We need to collect personal data for this purpose so we can enter into agreements with you.

- *To meet our regulatory obligations*

We also need to process your personal data in order for us to meet our obligations in accordance with the legislation, regulations or decisions from authorities. This could be, for example:

- to satisfy the requirements of the accounting and bookkeeping legislation,
- to satisfy the requirements of money laundering legislation,
- to meet the requirements of the Securities Trading Act
- to check personal data against sanctions lists as required by law or a decision from an authority
- to be able to report to the Norwegian Tax Administration, the Police, the Enforcement Office, Finanstilsynet and other Norwegian and foreign authorities
- to comply with legislation concerning risk management, which includes processing personal data to determine the quality of credit for capital requirements purposes,

- *When we have a legitimate interest*

We process your personal data when it is necessary for a purpose associated with the administration of agreements or fulfillment of expectations or statutory obligations and where there is a legitimate interest. This means that we have a legitimate (justified) interest in processing personal data and where this interest weights up the interest of the individual's privacy. Processing your information to check for possible conflicts of interest is an example of processing that may be based on legitimate interest.

- Based on the consideration of legitimate interest, we may also process your personal information to perform market and customer analyzes for business development as well as to improve the product range to our customers. The information can also be used for system development, as well as to perform customer analyzes for the purpose of detecting fraud attempts.

We may also use your personal information to send you direct mail and offers. If you do not wish to receive direct mail, please let us know.

- *If you have given your consent*
In some cases, we need your consent to process your personal information. We will then ask you to accept that we process the data for the specific purpose.

You have the right to withdraw your consent at any time after you have given it. In such cases, the processing we have already performed will not be affected, but we will not be able to continue to process the information for the stated purpose. If you withdraw a consent you have given, it may affect certain contract terms - for example if the information has been the basis for a lower price.

How long do we store your personal data for?

We will store your personal data for as long as the agreement with you lasts. After this, we will normally store data for a further ten years calculated from the end of the year in which the contractual relationship ends. Other deadlines may apply if the personal data is stored for purposes other than due to the contractual relationship or deadlines stipulated in law or regulations, for example to comply with the provisions on measures against money laundering and accounting and tax rules. In some cases, we store personal information for a longer period of time in order to comply with the capital requirement legislation

How do we protect your personal data?

We do our best to protect your personal data from accidental or unlawful destruction, loss or alteration, unauthorised disclosure or unauthorised access. As a financial institution, we are subject to strict rules related to confidentiality. Therefore, we have established extensive technical and organizational measures.

We always aim to not process any more data than necessary. If a partner processes personal data on behalf of us, they must always commit to maintaining the appropriate level of security and take appropriate protective measures. We ensure this through agreements with such third parties

Who can access your personal data?

- Within the SEB Group
Under the section "*Why and on what basis do we process your personal data?*" we have explained why and on what basis we process your personal data. It will primarily be Skandinaviska Enskilda Banken AB (publ) Oslofilialen that processes the data, but in some cases other units in the SEB Group will process personal data, based on a established group instructions and the global systems and processes that the SEB Group has established. When other units in the SEB Group process your personal data, it will, with the exception of those cases where such processing follows directly from regulatory requirements, be a legitimate interest that is the basis for the processing.

Outside the SEB Group

It is possible that your information will be processed by other companies or institutions we have a partnership with. Such cooperation will always take place pursuant to the applicable confidentiality rules. These companies can be, for example, the National Population Register, the business register, Bisnode, VISA, Mastercard, or Signicat (BankID). When other companies we are in partnership with process your personal data, this is done in order for us to be able to fulfil our agreements with you or on the basis of a legitimate interest.

- Transfers to third countries (countries outside the EU and EEA)
In some cases, we may transfer personal data to a country outside the EU and the EEA (so-called third countries) as well as to an international organization. Such transfers are only permitted if other rules in the GDPR are followed, and if one of the following conditions is met:
 - The European Commission has decided that there is an adequate level of protection in the country in question.
 - We have other necessary protection measures in place, e.g. standard contractual clauses or binding corporate rules.
 - There is a separate permit from the supervisory authority.
 - In special cases, this is permitted in accordance with current data protection legislation.

What are your rights?

Your rights under the personal data legislation mean that you have the right to receive information about how your personal data is processed, and that you have control over your own personal data. You can contact us if you want to exercise your rights. We point out that the general rights apply unless otherwise stated in various legal provisions.

- Request a print with an overview of registered personal data.
You have the right to receive information about which personal data about you we process. You can get this by requesting a register extract from us. You can request a simplified register extract from your online bank, and then you will see the information immediately. If you do not have access to the online bank, or want to order a complete print, you can use the solution at <https://seb.no/regelverk-og-sikkerhet/personvern> or by

contacting our Data Protection Officer. You will find contact information for our Data Protection Officer at the bottom of this document.

- Request correction of incorrect or incomplete information
If it turns out that we process incorrect personal data about you, you have the right to request that this information should be corrected. You also have the right to request for completion if certain information should prove to be incomplete.
- Delete your personal data
In some cases, you have the right to have some, or all of your personal data deleted. This is sometimes called the *right to be forgotten*. In some cases, we may not delete all data. This may be because we have to store the data due to contractual conditions or applicable law and that personal data is still necessary for the original purpose and we still have a legal basis for processing the data.
- Limit how long we store your personal information
In some situations, you may request that the processing of your personal data should be restricted for a period of time. For example, if you believe that information about you is incorrect, we must check this. It may also be if you have protested against processing based on legitimate interest. Then we must check whether our interests outweigh your interests.
- Complain about how we store your personal information
If we process information about you on the basis of a legitimate interest, you can object to this processing. In order to continue with the treatment, we must be able to show that we have necessary, justifiable reasons for the treatment, and that these outweigh your interests and rights. You can read more about legitimate interest in the sections above.
- Transfer your data to another player ("Data portability")
If we process your personal data based on an agreement or consent, you have the right to receive the personal data you have provided to us. If it is technically possible, you have, with the limitations that may appear from various legal provisions, also the right to have the data transferred to another person or player. This is called *data portability*.

Data Protection Officer

We have appointed a privacy representative (Data Protection Officer) whose task is to monitor that we follow the rules on the protection of personal data. The Data Protection Officer shall carry out his task in an independent manner in relation to Skandinaviska Enskilda Banken AB (publ) Oslofilialen. If you want to get in touch with Data Protection Officer you can do so by writing to: Skandinaviska Enskilda Banken AB (publ) Oslofilialen, Personvernombudet, Postboks 1843, Vika 0123 Oslo or pr. e-mail to personvernombud@seb.no If you use e-mail, you must not send personal information in the e-mail unless this is done in protected (encrypted) attachments.

Complaint to the supervisory authority

If you want to complain about the way we have processed your personal information, you can contact the Norwegian Data Protection Authority (Datatilsynet).

Read more on their website www.datatilsynet.no