

# Swedbank Privacy Notice

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In this Privacy Notice we describe how Swedbank processes your Personal Data. In this Privacy Notice Swedbank means the companies within the Swedbank Group specified under section "Data controllers".

Data controller means any person or entity, who alone or jointly with others, determines the purposes and means of the processing of personal data. The data controller will normally be the Swedbank company(ies) you have a relationship with.

Personal data means any information that, directly or indirectly, can identify a living natural person. Processing means any operation or set of operations performed with regard to Personal data, whether or not performed by automated means, such as collection, recording, storage, alteration, gathering or erasure.

Information on how to exercise your rights as a Data subject and contact details to the data controllers within the Swedbank Group in Sweden can be found at the end of this document.

When we write 'Swedbank', 'the Bank', 'we' or 'us' we refer to the companies in the Swedbank Group in Sweden as specified under the section "Data controllers".

When we write "the Client" we mean any individual who uses, has used or expressed a wish to use the Services.

When we write "you" we mean the reader of this document who is a Client and user the Services or otherwise has a relationship with Swedbank.

Swedbank processes Personal Data related to the following categories of Data subjects:

- Existing, prospect or potential Client
- Corporate customer employee
- Debtor
- Payer
- Mortgagee
- Guarantor
- Trustee, authorised representative
- Signatory, corporate representative
- Shareholder
- Contact person in relation to Swedbank
- Board member and other senior executives
- Beneficial owner
- Visitor of Swedbank's branches

## Definitions

**Data Protection Legislation** means the applicable data protection legislation such as Regulation (EU) 2016/679 (General Data Protection Regulation; the “GDPR”) and national legislation supplementing the GDPR.

**Data Subject** means any identifiable living individual whose personal data is collected, held or processed by an organisation.

**Regulatory Legislation** means the applicable rules and legislation, for example in regard to anti-money laundering, financial secrecy, taxes, bookkeeping, credit, consumer credit, payment, payment services and financial business.

**Services** means any of Swedbank’s services such as advice and products relating to savings, investments, lending, cards, insurance, pensions, leasing, including products and services of carefully selected cooperation partners that are provided digitally on Swedbank’s apps and websites, by contacting customer service or from a Swedbank branch.

## General

Where appropriate and relevant, details and specific information on the processing of personal data may also be included in agreements, on websites and in other documents related to the Services.

Swedbank has implemented appropriate technical and organisational measures to safeguard personal data from unauthorized access, unlawful disclosure, accidental loss, modification, destruction or any other unlawful processing.

In some cases Swedbank engages data processors. The data processors may only process personal data in accordance with Swedbank’s instructions in the data processing agreement between the parties.

## Collection of personal data

Personal data will normally be collected directly from you for example when you enter into an agreement with us and from your use of the Services or otherwise when you use our communication channels for contact. Swedbank can also may collect personal data from external sources such as public registers or other providers of databases if it is necessary to verify, supplement or update the information about you.

## Recording of telephone calls

Swedbank may collect Personal Data through recording of telephone calls or by other recording of images and/or audio.

We do this to fulfill legal requirements such as the obligation to document securities transactions. Recording also-takes place for

security purposes, and to combat fraud and counter money laundering, as well as to document what was agreed during the conversation. Call recordings may also be used for educational purposes.

When providing Services relating to insurance Swedbank may collect data relating to your family relationships, relatives, beneficiaries and heirs.

## Categories of personal data

Categories of personal data that Swedbank collects and processes are:

**Identification and Relationship data** such as name, personal identification code/number, date of birth, data regarding identification documents, copy of passport or driver’s license, Mobile Bank ID and IP address. Swedbank also processes information

regarding citizenship, occupation, marital status, relatives, beneficiaries and heirs.

**Contact information** such as address, country of residence, telephone number and email address.

**Financial data** such as accounts, ownership, transactions, credits, income, debts, the Client's financial experience and investment objectives such as data collected during the selection and provision of investment services, investment or insurance services and other products carrying investment risk knowledge, trade requests or transactions executed-in financial instruments. **Data about trustworthiness** such as payment behaviour, damage afflicted to Swedbank or other party, data that enables Swedbank to perform its due diligence measures regarding money laundering and terrorist financing prevention and to ensure the compliance with international sanctions, including the purpose of the business relationship and whether the Client is a politically exposed person, as well as data on the origin of assets or wealth such as data regarding your transaction partners and business activities.

**Data required when performing an obligation arising from law** such as data that Swedbank may be required to report to authorities, such as tax authorities.

**Communication & Services data** collected when you visit Swedbank's branches, ATMs and other areas where Swedbank renders Services or communicates with you for Service related purposes such as complaints, via telephone calls or other recording of images and/or audio, e-mail, messages and other communications such as in Swedbank's social media, or when visiting Swedbank's website or when communicating via Swedbank's internet and mobile banking and apps. Swedbank collects data on geographic positioning.

**Data about habits, preferences and Client satisfaction** such as to what extent and how

often the Services are used, which Services are used, personal settings and survey responses.

**Special categories of personal data** such as data related to the Client's health when providing insurance products and trade union membership when providing membership loans.

Swedbank may process special categories of personal data if required for exercise of a legal claim or if Swedbank is required by a legal obligation or a collective bargaining agreement.

## Legal basis and purposes

### Performance of a contract

Performance of a contract is one of the legal basis according to which Swedbank processes personal data. Examples of purposes of such processing include:

- To take steps prior to entering into a contract, as well as to conclude, execute and terminate a contract;
- To execute national and international transactions via credit institutions and payment systems;
- For managing Client relations and administrating access to the Services;
- To verify a commercial transaction or other business communication;
- To authorize and control access to the Services;
- To identify the Client when accessing the Services.

### Legal obligation

Swedbank processes personal data to comply with legal obligations in accordance with applicable Regulatory Legislation. Purposes for such processing include

- To check and verify your identity and to keep personal data updated and correct by verifying data through external and internal registers (Know Your Customer obligations);

- To prevent, discover, investigate and report potential money laundering, terrorism and proliferation financing and sanctions;
- To carry out credit and other risk assessments when providing credits and other financial services, risk hedging and capital requirements for Swedbank;
- To prevent, discover, investigate and report potential suspicious transactions and market abuse;
- To share Personal data with certified third-party payment providers to provide account information and/or payment initiation services in accordance with applicable payment service legislation;
- To comply with Regulatory legislation related to securities transactions by verifying and documenting a commercial transaction or other business communication;
- To carry out mandatory communication and reporting to tax authorities (Skatteverket), police authorities (Polismyndigheten) and other supervisory authorities;
- To manage incidents;
- To manage complaints, as well as to retain information for this purpose;
- To comply with book-keeping and accounting regulations;
- To comply with other legal obligations in accordance with the Regulatory Legislation.
- To maintain, develop, examine and improve Swedbank business, the Services, the Client's user experience, to strengthen Client's satisfaction and loyalty, and Swedbank's brand by performing surveys, analyses and statistics;
- Perform sanctions screening to detect, prevent, manage, and mitigate financial crime risks;
- To organize competitions and campaigns;
- To protect your or Swedbank's interests and/or Swedbank's employees interests, including physical security measures, camera surveillance etc;
- To communicate with corporate representatives as well as to provide Services within the scope of the contractual relationship with the corporate customer;
- To communicate with a Data Subject who is not a Client;
- To prevent, limit and investigate any misuse or unlawful use or disturbance of the Services;
- To ensure adequate provisions of the Services, the safety of information within the Services, as well as to improve, develop and maintain applications, technical systems and IT infrastructure, including testing Swedbank's digital environment;
- In order to make a risk evaluation, monitor portfolio, as well as to mitigate Swedbank's potential risks;
- To assess whether you are eligible for a Service in order to ensure compliance with the Regulatory Legislation in area of financing and support credit decision-making processes;
- To establish, exercise, or defend legal claims, debt collection cases and handle complaints.

### Legitimate interest

In some cases Swedbank process your personal data with legitimate interest as legal basis. Such Processing can only take place if Swedbank's interests outweigh those of you as the Data Subject and if the processing is necessary for the purpose in question.

Examples of such purposes include :

- To provide additional Services, personalized offers and direct marketing that do not involve processing of Client's transaction data;

### Consent

Swedbank will in some cases ask for your consent to process your personal data. Examples of such situations are processing

of payment transaction data for marketing purposes.

Before giving consent you will be presented with information on the processing such as the purpose for processing; the categories of personal data included in the processing and your right to withdraw given consent at any time.

## **Profiling and automated decision-making**

### **Profiling**

Profiling is any form of automated processing of personal data to evaluate certain personal aspects relating to a natural person, in particular, to analyze or predict aspects concerning economic situation, health, personal preferences, interests, reliability and behavior.

Swedbank uses profiling for example, for risk analysis for the purpose preventing fraud, based on the performance of a contract as legal ground. Profiling is also used for marketing activities and Service development based on Swedbank's legitimate interest or your consent as legal ground. Swedbank can collect and automatically process information from external and internal sources and collect statistical data such as typical behaviour and life-style patterns.

This information is used for segmentation and profiling for example to provide Client advice, create a Client profile and thereby provide you with suitable recommendations and offers including for marketing purposes, insurance offers, for system development and for measures such as transaction monitoring to prevent and counter money laundering and financing of terrorism as well as for automated decision-making such as credit assessments, risk management and transaction monitoring to counter fraud.

Swedbank can process Personal Data utilizing machine learning for the purpose of providing relevant personalized offers of the Services and prioritize these offers to you

based upon how you and other similar Clients, navigate in the digital environment of Swedbank and interacts with our offers.

### **Automated decision-making**

Automated decision-making means a process where decisions that have a legal or similarly significant effect concerning you are made by automated means and without human involvement. -

We base our automated decision-making on data provided by you and data collected from internal and external sources.

Swedbank makes decisions based solely on automated processing, including profiling, in the lending process. When you apply for a credit, the decision will be based on the information you have provided and information available to Swedbank such as existing liabilities, credit history, income, and information obtained from third parties (for example, credit register) as well as Swedbank's credit score model for risk evaluation.

The information is used to assess your ability to pay the costs related to the credit. You must not have any payment defaults.

This processing is necessary for entering into and for the performance of an agreement between you and Swedbank and to fulfill Swedbank's legal obligations. If the requirements are fulfilled, your application will be approved. If the requirements are not fulfilled your application will be declined.

Swedbank also makes decisions based solely on automated processing in order to detect, counter and prevent money laundering and terrorist financing, to secure sufficient Know Your Customer information and to detect, counter and prevent fraud. These decisions may lead to payment rejections or that you do not get access to Swedbank's Services. This Processing is necessary for entering into- and for the performance of an agreement between the

Client and Swedbank and to fulfil the legal obligations of Swedbank.

Additionally, Swedbank makes decisions based solely on automated processing regarding our Insurance products. For our risk insurances, there are different kinds of health requirements. In some cases a certificate of full ability for work is sufficient and in other cases a full health examination is required. If you or your employer apply for risk insurance and you meet the health test requirement to be fully fit for work, we in some cases may grant the insurance application directly without any manual processing. In such cases, the insurance application is granted without deviations.

This is necessary for a more efficient case handling and making consistent assessments. The processing is necessary for entering into and for the performance of the insurance agreement and to fulfil our legal obligations as an insurance provider.

Other types of automated decisions related to the assessment of an insurance application are made in the digital channels. In these cases, you receive specific information about the processing of personal data directly in the digital the flow as well as the opportunity to give your consent before the decision is made.

You have the right to contest the automated decision, have it reviewed by a human being, express your point of view and request a manual assessment of the decision, taking into account the information provided by you and your individual situation. For information on how to exercise your rights, please see section "Your rights as a Data Subject".

## Cookies

Cookies are small pieces of text sent to your browser by a website you visit. Read more about how we use cookies in Swedbank's cookie policy available on Swedbank's website:

[swedbank.se/cookies](https://swedbank.se/cookies)

## Camera surveillance

With the purpose of conducting surveillance as part of Swedbank's safety work, for example to prevent and investigate crime, Swedbank is using camera surveillance of Swedbank's office premises. The camera-surveilled areas are marked with signs. ATMs in close proximity to Swedbank's office premises may be surveilled. Swedbank will, also record sound in addition to images when there is suspicion of crime.

Swedbank's camera surveillance is carried out based on Swedbank's legitimate interest to ensure security of our employees, Clients and visitors. In the event of suspicion of a crime, personal data is processed to enable the establishment, exercising and defending legal claims.

Camera recordings will be retained no longer than 60 days. Recordings may be disclosed to the Police when necessary for a crime investigation. If a crime is suspected, recorded material will be retained for as long as necessary for the investigation. After the retention period ends, camera recordings will be deleted.

## Recipients of Personal Data

Swedbank can share your personal data to authorities in order to comply with laws and other regulations relating to, for example, taxes, anti-money laundering or terrorist financing.

Swedbank may share your Personal Data in order to provide our Services. In order to fulfil the product and service agreements, we need to share information regarding you with companies within the Swedbank Group and sometimes with external companies that we co-operate with such as other banks, payment intermediaries, transaction receivers and clearing houses, suppliers and parties that act on behalf of the Client.

The categories of Recipients of personal data, are:

- **Authorities:** tax authorities supervisory authorities and law enforcement agencies;
- **Companies within the Swedbank Group:** We disclose your personal data internally in the Swedbank Group when required or permitted by law;
- **Co-operation partners:** Swedbank share your personal data with companies we co-operate with when required or permitted by law. Such companies include:
  - Correspondent banks, central banks and other banks;
  - Insurance and reinsurance companies; including third parties related to provision of life and/or non-life insurance Services;
  - Payment providers and providers of electronic identification solution;
  - Participants and/or parties related to domestic, European and international payment systems;
  - Credit rating agencies;
  - Financial institutions and intermediaries of financial services, auditors and other third parties participating in the trade execution, settlement and reporting cycle;
  - Providers of databases and registers;
  - Debt collectors and bankruptcy or insolvency administrators;
- **Suppliers:** Swedbank can disclose your personal data to suppliers, such as:
  - Suppliers of IT and network systems including development, maintenance, hosting and support services.
- **Other recipients:**
  - Legal guardians

Swedbank will not disclose more Personal Data than necessary for the purpose of disclosure and only in accordance with applicable Regulatory Legislation and Data Protection Legislation.

## Geographical area of Processing

As a general rule, your personal data is processed within the EU/EEA but is in some cases transferred to and processed in countries outside of the EU/EEA, so called third countries.

The transfer to third countries can take place provided there is a legal basis, specific risk assessment and appropriate safeguards are in place, such as:

- An agreement including the EU Standard Contractual Clauses or other approved clauses, code of conducts, Binding Corporate Rules or certifications approved in accordance with GDPR.
- A copy of the applicable EU Standard Contractual Clauses used by Swedbank for the transfers of Personal Data to third countries can be found [here](#)
- The country outside of the EU/EEA where Recipient is located has adequate level of data protection as decided by the EU Commission. The list of countries so far recognised by the EU commission providing adequate protection is available [here](#).

Upon request you can receive further details on Personal Data transfers to countries outside of the EU/EEA and the appropriate safeguards. Contact details are available in section "Contact information".

## Retention period

Swedbank will process personal data no longer than necessary for the purposes for which the personal data is collected and as required by retention requirements in laws and regulations. For example, after the contractual relationship has expired, Swedbank will process personal data for accounting and anti-money laundering



purposes, for regulatory capital adequacy requirements as well as for the establishment, exercise or defence of legal claims according to the requirements in law.

This means Swedbank is often required by Regulatory Legislation to store personal data longer than necessary for the performance of the contract.

Examples of retention periods include:

- **Personal data related to provision of Swedbank's Services:** Swedbank processes the personal data until the end of the contractual relationship. After termination personal data is stored 10 years to protect legitimate interest of Swedbank or the Client in the event of a claim;
- **Personal data necessary to fulfil a legal obligation to prevent and detect money laundering and terrorist financing:** The personal data is stored at least 5 years and up to 10 years from termination of contractual relationship;
- **Personal data necessary to protect legitimate interests if the bank is under investigation or litigation:** The personal data is stored until the end of the investigation and litigation;
- **Personal data necessary to comply with Bookkeeping regulations:** Personal data is stored 7 years from the end of the financial year;
- **Personal data obtained through camera surveillance (CCTV)** The personal data is stored 60 days from recording;
- **Personal data collected with consent as legal basis for marketing purposes:** Personal data is stored for as long as the consent is valid.

## Your rights as a Data Subject

You have several rights in respect of Swedbank's processing of personal data:

- **Right of access:** You have the right to obtain information as to whether or not your personal data are being processed,

and, where that is the case, access to the personal data;

- **Right to rectification:** If the data is inaccurate or incomplete you have the right to request and obtain rectification of the personal data;
- **Right to erasure ("Right to be forgotten"):** You have the right to obtain erasure of your Personal Data in case;
  - You withdraw your consent and there is no other legal basis for the processing,
  - The Personal Data are no longer necessary in relation to the purposes for which they were collected
  - You object to the processing and there is no overriding legitimate ground for continuing the processing.
  - You object to processing for direct marketing purposes,
  - The processing of Personal Data is unlawful

This means that the right to erasure is restricted and can not be exercised when when we are obliged to retain personal data according to Regulatory legislation, retain personal data during the contractual relationship with the Client or when processing is necessary to establish, exercise or defend legal claims.

- **Right to restriction:** In some cases you have the right to obtain restriction of processing of your personal data, for example: If you have contested the accuracy of the personal data. The restriction will remain until the correctness of the data can be established;
  - If you have objected to the processing of personal data. The restriction will remain until it can be checked whether Swedbank's legitimate interests override your interests;

- If the processing is unlawful and you oppose the erasure of the personal data and request the restriction of the processing instead;
- If Swedbank no longer needs to process the personal data but the data is necessary for you to exercise or defend a legal claim.

Even when processing of your data has been restricted as described above, Swedbank can process the personal data if it is necessary to enforce a legal claim, or for the protection of the rights of another natural or legal person, or if you have given your consent.

- **Right to object:** You have the right to object to processing of your personal data that is performed with “legitimate interest” as legal basis. If you object to direct marketing and profiling in connection to such marketing the personal data will no longer be processed for that purpose.
- **Right to data portability:** You have the right to receive the personal data that you have provided Swedbank in a machine-readable format.. This right applies to personal data processed only by automated means and based on the legal ground “Consent” or “Performance of a contract”. The data can be transmitted by us to another data controller if it is secure and technically feasible.

A form for invoking your rights to access is available here:

<http://www.swedbank.com/about-swedbank/personal-data.html>

## Contact details

If you have questions or want to exercise your privacy rights please contact us in one of the following ways

### By mail at the following Postal address:

Swedbank AB, GSS Operations, Box 2083, 600 02 Norrköping, Sweden.

**In one of our Bank branches:** Find your local branch office [here](#).

As a Data Subject you can lodge complaints pertaining to Swedbank’s Processing of Personal Data to the Swedish Authority for Privacy Protection (<http://www.imy.se/>)

Contact details of Swedbank are available on Swedbank’s website [swedbank.com](http://swedbank.com).

### Managing privacy settings

As a Client, you can make your privacy settings and personal choices in the digital tool available in the internet and mobile bank and in the app. You can opt-out from personal offers and marketing-based profiling, which is done according to Swedbank’s legitimate interest. You can also give your consent and/or withdraw consent to the processing of transaction data for marketing purposes. You may also visit a a Swedbank office or call the Swedbank’s Customer Service Centre to change certain information, approvals and choices.

## Contact details Data Protection Officers

### Swedbank AB

Data Protection Officer (DPO)

105 34 Stockholm

Sweden

E-mail: [dpo@swedbank.se](mailto:dpo@swedbank.se)

### Swedbank Robur AB

Data Protection Officer

105 34 Stockholm

Sweden

E-mail: [dataprotection@swedbankrobur.se](mailto:dataprotection@swedbankrobur.se)

## **Swedbank Försäkring AB**

Data Protection Officer

105 34 Stockholm

Sweden

E-mail: [mailto:dpo\\_sfab@swedbank.se](mailto:dpo_sfab@swedbank.se)

## **Swedbank Hypotek AB**

Data Protection Officer

105 34 Stockholm

Sweden

E-mail: [hypotek\\_dpo@swedbank.se](mailto:hypotek_dpo@swedbank.se)

## **Data Controllers**

Swedbank AB (publ), orgnr 502017-7753

Swedbank Robur AB, orgnr 556110-3895

Swedbank Försäkring AB, orgnr 516401-8292

Swedbank Hypotek AB, orgnr 556003-3283

## **Changes and latest version**

We are constantly working to improve and develop our Services and our business, and therefore the content of this information on the processing of personal data may change over time. In the event of significant changes, Swedbank will notify you when we are obliged by law.

The latest version of the Privacy Notice is made available on Swedbank's website:

[swedbank.se](https://www.swedbank.se)

**Last updated as of 2<sup>nd</sup> May 2023**