

# Principles of Processing Personal Data

In these **Principles of Processing Personal Data**, we describe how the Swedbank group Processes your Personal Data. For more information and/or to exercise your rights as a data subject, contact details to Swedbank AB (publ) can be found at the end of this document.

## 1. Definitions

**Client** means any natural person who uses, has used or has expressed a wish to use the Services or is in other way related to the use and/or user of the Services provided by Swedbank, as well as any other relationship with Swedbank established before these Principles entered into force. Categories of data subjects described under section 3.1 are included in this definition of Client.

**Data Processor** means anyone who Processes Personal Data on behalf of a Data Controller.

**Data Controller** means a legal entity, who alone or jointly with others, determines the purposes and means of the Processing of Personal Data.

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

**EU/EEA** mean the European Union/European Economic Area.

**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.

**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, organisation, storage, adaptation, alteration, retrieval, gathering, use, combination, blocking, erasure or destruction.

**Recipient** means a natural or legal person, public authority or another body, to whom Personal Data may be disclosed by Swedbank. Examples of Recipients are under section 8.

**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 or from a Swedbank branch.

**Swedbank** means Swedbank AB (publ) and subsidiaries.

## 2. General provisions

The Principles describe how Swedbank Processes Personal Data. Specific details and information on the Processing of Personal Data may also be described in agreements, on websites and in other documents related to the Services.

Swedbank ensures, within the framework of Data Protection Legislation, the confidentiality of Personal Data and 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.

Swedbank may use approved Data Processors for Processing Personal Data. In such cases, Swedbank takes necessary steps to ensure that Data Processors Process Personal Data under documented instructions of Swedbank, in accordance with the required and adequate security measures and otherwise in compliance with Data Protection Legislation and Regulatory Legislation.

## 3. Swedbank's Processing of Personal Data

### 3.1 Collection of Personal Data and categories of data subjects

Personal Data may be collected from the Client directly, from the Client's use of the Services and from external sources such as public and private registers or other providers of databases. Swedbank may also record telephone calls, images and/or audio, save e-mail communication or otherwise document the Client's interaction and communication with Swedbank.

Swedbank primarily collects from and Processes Personal Data about natural persons whom have entered into or wishes to enter into an agreement with Swedbank, such as customers, debtors or pledgees. Swedbank also collects and Processes Personal Data from prospect customers, payers, trustees, administrators, agents, legal representatives, corporate representatives, signatories, shareholders, stakeholders, contact persons, board members, beneficial owners and visitors of Swedbank's branches.

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

### 3.2 Categories of Personal Data

Categories of Personal Data that Swedbank collects and Processes are for example:

**Identification & contact data** such as name, personal identification code/number, date of birth, data regarding identification documents, address, telephone number, email address, country of residence.

**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 executed transactions in financial instruments.

**Data about trustworthiness and due diligence** 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 origin of assets or wealth such as data regarding the Client's transaction partners and business activities.

**Data obtained and/or created while performing an obligation arising from law** such as data that Swedbank may be required to report to authorities, such as tax authorities, courts, law enforcement agencies including details of income, credit commitments, property holdings, remarks, and debt balances.

**Communication & Services data** collected when the Client visits Swedbank's branches, ATMs and other areas where Swedbank renders Services or communicates with the Client for Service related purposes such as complaints, via telephone, images and/or audio recordings, e-mail, messages and other communications such as social media, data related to the Client's visit at Swedbank's websites, as well as data related to geographical positioning and communication through Swedbank's internet & mobile bank and apps, such as BankID.

**Data about habits, preferences and Client satisfaction** such as the activeness of using the Services, Services used, personal settings and survey responses.

**Special categories of Personal Data** such as data related to the Client's health and trade union membership.

To be able to provide the Services, Swedbank may in some cases Process special categories of Personal Data. Swedbank may ask for the Client's consent when Processing special categories of Personal Data, for example, when information is required for the Services related to health insurance products or membership loans. Swedbank may also Process special categories of Personal Data if required for exercise of a legal claim, if Swedbank is required by a legal obligation or a collective bargaining agreement.

## 4. Legal basis and purposes

### 4.1 Performance of agreements

The main purpose of Swedbank Processing the Client's Personal Data is to document, execute and administer agreements with the Client. Examples of purposes for Processing are:

- To take steps at the request of the Client prior to entering into an agreement, as well as to conclude, execute and terminate an agreement.

- To execute national and international transactions via credit institutions and payment systems.
- For managing Client relations and administrating access to the Services.
- To carry out internal credit- and risk assessments in order to determine on what terms and which Services can be offered.
- To verify a commercial transaction or other business communication.  
Swedbank may record telephone calls for this purpose.
- To authorize and control access to the Services.
- To identify the Client when accessing the Services.

#### 4.2 Legal obligations

In order for Swedbank to be able to comply with its legal obligations, Swedbank Processes Personal Data in accordance with Regulatory Legislation and Data Protection Legislation. Examples of purposes for Processing are:

- To check and verify the Client's identity and to keep Personal Data updated and correct by verifying and enriching data through external and internal registers (KYC).
- To prevent, discover, investigate and report potential money laundering and terrorist financing.
- To carry out credit- and other risk assessments when providing credits and other financial services, risk hedging and capital requirements for Swedbank.
- To comply with rules and regulations relating to accounting and risk management.
- To comply with rules and regulations relating to insurance, actuary and statistic purposes.

#### 4.3 Legitimate interest

Swedbank Processes the Client's Personal Data for Swedbank's legitimate interest. Swedbank has considered this Processing to be necessary for the purposes of the legitimate interest pursued by Swedbank, which Swedbank have considered outweighing the Client's interest of protection of the Personal Data. Examples of purposes for Processing are:

- To provide additional Services, personalized offers and direct marketing.
- To develop, examine and improve Swedbank's business, the Services and the Client's user experience by performing surveys, analyses and statistics.  
Swedbank may record telephone calls for this purpose.
- To organize competitions and campaigns.
- To protect the interests of the Client and/or Swedbank and Swedbank's employees, including security measures.
- To communicate with corporate representatives and to provide Services within the scope of the contractual relationship with the corporate customer.
- 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.

- To establish, exercise and defend legal claims and to handle complaints.

#### 4.4 Consent

Swedbank will in some cases ask for the Client's consent to Process Personal Data. Before giving consent, the Client will be presented with information on the Processing. Consent can always be withdrawn, and the Client will be informed of any consequences of such withdrawal.

## 5. Profiling and automated decision-making

Profiling refers to the automatic Processing of Personal Data used to assess certain personal characteristics of the Client in particular to analyse or predict, for example, the economic situation, personal preferences, interests and place of residence of such individual. Profiling is for example used to analyse Client advice, marketing purposes, system development and for measures preventing 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 may Process Personal Data to improve the Client's user experience of the Services, such as customizing the display of the Services to the device used and creating suitable offers for Clients. Unless direct marketing has been restricted by the Client, Swedbank may Process Personal Data for the purpose of providing personalized offers of the Services. Such marketing may for example be based on the Services which the Client uses, the usage of the Services and the Client's navigation in the digital environment of Swedbank.

Swedbank may also collect statistical data regarding the Client, such as typical behaviour and lifestyle patterns based on demographic household data. Statistical data for creating segments and profiles can be collected from external sources and may be combined with Swedbank's internal data.

## 6. Cookies

When the Client visits Swedbank's websites, cookies are used by Swedbank. The cookies used are listed in Swedbank's cookie policy available on Swedbank's website [swedbank.com/cookies](https://swedbank.com/cookies).

## 7. 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 connection with Swedbank's office premises may also be surveilled. In case of Swedbank's suspicion of crime, Swedbank will, also record sound in addition to images.

Swedbank's camera surveillance is carried out based on Swedbank's legitimate interest of ensuring security of our employees and Clients. Swedbank considers the recordings a limited risk for the Client's rights and freedom in comparison to

being subject of a crime if the surveillance had not been in, or in close connection to, Swedbank's office premises. Personal Data processed for the suspicion of crime is Processed based on establishing, exercising and defending legal claims.

Recordings of images and audio are disclosed to relevant Recipient in case the recorded material is needed for criminal investigation, or with a Recipient that maintains, services or conducting the camera surveillance on behalf of Swedbank. With respect to the purpose of Swedbank's camera surveillance, camera recordings will be retained no longer than necessary.

## 8. Recipients of Personal Data

As part of Processing Swedbank may share the Client's Personal Data with Recipients such as authorities, companies, suppliers, payment service providers and business partners. Swedbank will not disclose more Personal Data than necessary for the purpose of disclosure and only in accordance with Regulatory Legislation and Data Protection Legislation.

Recipients may Process the Client's Personal Data based on Regulatory Legislation and Data Protection Legislation. When Recipient is Processing Personal Data, the Recipient may be responsible for providing information on such Processing of Personal Data.

Swedbank may disclose Personal Data to Recipients, such as:

- Authorities such as tax authorities, supervisory authorities and law enforcement agencies.
- Affiliates within the Swedbank group.
- Third party payment providers, in case Swedbank has a legal obligation to provide such entities access to the Client's Personal Data.
- Credit and financial institutions, correspondent banks, insurance providers and intermediaries of financial services, third parties participating in the trade execution, settlement and reporting cycle.
- Financial and legal consultants, auditors or any other service providers of Swedbank.
- Providers of databases and registers, for example credit registers, population registers, commercial registers, securities registers or other register holding or intermediating Personal Data, debt collectors and bankruptcy or insolvency administrators.
- Credit reference agencies and credit report companies.
- Suppliers, for example, of camera surveillance, IT and networks.
- Participants and/or parties related to domestic, European and international payment systems.

## 9. Geographical area of Processing

As a general rule, the Client's Personal Data is Processed within the EU/EEA but is in some cases transferred to and Processed in countries outside of the EU/EEA.

The transfer and Processing of Personal Data outside of the EU/EEA can take place provided there is a legal basis and appropriate safeguards are in place. Appropriate safeguards, such as:

- An agreement including the EU Standard Contractual Clauses or other approved clauses, code of conducts, certifications approved in accordance with GDPR.
- The country outside of the EU/EEA where Recipient is located has adequate level of data protection as decided by the EU Commission.

Upon request, the Client can receive further details on Personal Data transfers to countries outside of the EU/EEA.

## 10. Retention period

Personal Data will not be retained longer than necessary for the purposes for which the Personal Data is Processed or required by Regulatory Legislation or Data Protection Legislation. For example, after the contractual relationship has expired, Swedbank will Process Personal Data for the establishment, exercise or defence of legal claims. Personal Data is also retained for pursuing Swedbank's legitimate interest. Data retention requirements in Regulatory Legislation may be subject for national law and therefore may differ depending on country.

## 11. Rights as a data subject

The Client has rights as a data subject in regard to Swedbank's Processing of Personal Data under Data Protection Legislation. Such rights are in general:

- To require the Client's Personal Data to be corrected if it is inadequate, incomplete or incorrect.
- To object to Processing of the Client's Personal Data.
- To require the erasure of the Client's Personal Data.
- To restrict the Processing of the Client's Personal Data.
- To receive information if the Client's Personal Data is being Processed by Swedbank and if so then to access it.
- To receive the Personal Data that is provided by the Client and is being Processed based on consent or performance of an agreement in written or commonly used electronic format and were feasible transmit such data to another service provider (so called "data portability").
- To withdraw the consent to Process the Client's Personal Data.
- To restrict Processing of the Client's personal Data for direct marketing and personalized offers.
- To request not to be subject to fully automated decision-making, including profiling, if such decision-making has legal effects or similarly significantly affects the Client. This right does not apply if the decision-making is necessary in order to enter into or to perform an agreement with the Client, if the decision-making is permitted under Data Protection Legislation or if the Client has provided explicit consent.



As a Client you can lodge complaints pertaining to Swedbank's Processing of Personal Data to the Swedish Authority for Privacy Protection ([www.imy.se](http://www.imy.se)) if you consider that Processing infringes on your rights and interests under Data Protection Legislation.

## 12. Contact details

You may contact Swedbank with enquiries, requests for register extracts, withdrawal of consent or to exercise other data subject rights, including complaints regarding the Processing of your Personal Data.

For personal offers and marketing-based profiling, which is done according to Swedbank's legitimate interest, Swedbank enables choices and the usage of a convenient tool for you to manage privacy settings. You may change certain information, approvals and choices in the internet & mobile bank or in apps, at a Swedbank office or by calling the Swedbank's Customer Service Centre.

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

Below are contact details for contacting Swedbank to, for example, exercise your rights as a data subject. You can always contact Swedbank AB (publ) even if you have a relationship to with another company within the Swedbank group.

Swedbank AB  
GSS Operations, Box 2083  
600 02 Norrköping

For enquiries:  
Swedbank AB (publ)  
105 34 STOCKHOLM  
Reg. no: 502017-7753

Swedbank's Data Protection Officer:  
Swedbank AB (publ)  
Data Protection Officer (DPO)  
105 34 STOCKHOLM

The contact details are also applicable for other Data Controllers within the Swedbank group.

Swedbank Robur Fonder AB, reg. no: 556198-0128

Swedbank Robur AB, reg. no: 556110-3895

Swedbank Försäkring AB, reg. no: 516401-8292

Swedbank Hypotek AB, reg. no: 556003-3283



### 13. Data Controllers within the Swedbank group

Please note that information on the Processing of your Personal Data performed by other Swedbank companies may, for example, be described in agreements, in related information and/or versions of these Principles.

The Data Controller for the Processing of your Personal Data will normally be the Swedbank company(ies) that you have a relationship with. See contact details above.

### 14. Changes and latest version

Swedbank updates the Principles continuously, for example, if new purposes for Processing are added or if additional categories of Personal Data are Processed.

The latest version of the Principles is made available on Swedbank's website [swedbank.com](https://www.swedbank.com).

*Last updated as of 1<sup>st</sup> of January 2021.*