

PRIVACY POLICY

1 GENERAL

- 1.1 DNB Bank ASA, Finland Branch, org. no. 1817507-9 ("**DNB**") respects and safeguards your privacy. We want you to feel safe when we process your personal data. With this privacy policy (the "**Privacy Policy**") we want to show how we ensure that your personal data is handled in accordance with applicable legislation.

In order to be able to provide our products and services, we need to use personal data about you. This Privacy Policy applies to those who are a customer of ours or represent a customer of ours, those who are users of our products and services, and those who visit our website.

2 DATA CONTROLLER

DNB is the data controller for the use of your personal data and is responsible for ensuring that the use is in accordance with applicable legislation. We have also appointed a data protection officer, who you can reach at dataskyddsbudet@dnb.se. You can find our contact details at the bottom of this Privacy Policy.

3 OUR USE OF YOUR PERSONAL DATA

- 3.1 At DNB we use your personal data in order to be able to provide the products and services we offer in the best possible way. We therefore use your personal data for the following purposes:

- Administration and the fulfilment of agreements as well as for the purpose of safeguarding our legal interests in the event of a dispute,
- Compliance with legal obligations;
- Marketing, including customised direct mail,
- Methodological and business development,
- Administration in connection with business acquisitions, restructuring etc.

The following tables give you more information about why we use your personal data, what personal data we save to achieve those purposes, and how long we save your personal data for.

<p>Purpose: Administration and the fulfilment of agreements as well as for the purpose of safeguarding our legal interests in the event of a dispute</p>		
<p style="text-align: center;">Personal data:</p> <p><u>Contact details</u> such as name, personal identity number, telephone number, e-mail address and address.</p> <p><u>Data for the granting of credit</u> such as bank details, employer information, information about debt reconstruction, and credit rating.</p> <p><u>Login details</u> such as e-mail address and BankID.</p> <p><u>Recording and documentation</u> of your contact with DNB.</p> <p><u>Other personal data</u> submitted in connection with an application/expression of interest/agreement or otherwise recorded in connection with the administration of an agreement as well as for action that has been requested before or after an agreement has been entered into.</p>		
<p>What we do: We use your data in order to be able to provide, manage and personalise our products and services, as well as to enable logins to our web services and provide customer service, such as being able to decide whether to provide a loan, issue a credit card, or otherwise grant you credit. In the event of a dispute, for example regarding payment, we are entitled to use your data for the purpose of determining, defending, or asserting the legal claim.</p>	<p>Legal basis: Fulfilment of agreements. In the event of a dispute, we are entitled to use your data on the basis of a balancing of interests.</p>	<p>Storage time: The data is saved throughout the contractual relationship and for up to 12 months from the date of termination of the agreement. The data may be saved for longer if required to comply with statutory requirements. For example, data concerning credit that has been granted is saved for five years after the agreement has been terminated and the agreement itself is saved for seven years after it has expired. In addition, personal data may be saved for more than 12 months after the agreement has expired for the purpose of determining, defending or asserting a legal claim, such as in the case of a payment dispute.</p>

Your rights: You have the right to object to our use of your personal data when it is based on a balancing of interests. If you object to such use, we will only continue to use your personal data if there are important reasons for doing so that outweigh your interests. See section 8 to learn more about your rights.

Purpose: Compliance with legal obligations		
Personal data:		
<u>Contact details</u> such as name, personal identity number, telephone number, e-mail address and address.		
<u>Data for the granting of credit</u> such as bank details, employer information, credit rating, transaction patterns, leading roles and ownership interests in companies, and information about the ultimate beneficial owner.		
<u>Login details</u> such as e-mail address and BankID.		
<u>Data relating to the status of a "politically exposed person" or relatives or close associates of such a person</u> , such as a member of a national parliament, member of government, holder of a senior position in a state-owned company or the like.		
<u>Data relating to a presence on various international sanctions lists.</u>		
<u>Data relating to customer classification in accordance with the Markets in Financial Instruments Directive (MiFID).</u>		
<u>Data relating to domicile for tax purposes.</u>		
What we do: We use your personal data to comply with DNB's obligations under applicable legislation, such as the Swedish Accounting Act, the Swedish Money Laundering and Terrorist Financing (Prevention) Act, capital requirement rules, and tax legislation, as well as in order to check personal data against the applicable sanctions lists.	Legal basis: Legal obligation	Storage time: We will save your personal data for as long as we have to save your personal data in order to comply with the legal obligation in question.
Your rights: See section 8.		

Purpose: Administration in connection with business acquisitions, restructuring etc.		
Personal data:		
<u>Contact details</u> such as name, telephone number, e-mail address and address.		
<u>Order and payment information</u> such as purchase and transaction history.		
What we do: If DNB is to be restructured, e.g.	Legal basis: Balancing of interests, because we	Storage time: If DNB ceases to exist, e.g. through a merger,

<p>divided up into several different businesses, or if a third party wishes to acquire DNB or our customer database, DNB will disclose your personal data and that of other customers to the acquiring company. In such cases, unless you receive other information in connection with the transfer, the company will continue to use your personal data for the same purposes that we specified in this Privacy Policy.</p>	<p>assess that our interest in enabling an acquisition or restructuring process outweighs your interest in protecting your personal data. However, this assumes that the acquiring company conducts similar business activities to DNB.</p>	<p>liquidation or bankruptcy, or if DNB's customer database is transferred to an acquiring or surviving company, we will erase your personal data so long as we do not have to retain it in order to meet legal requirements.</p> <p>If DNB is acquired by a company, or divided in connection with a restructuring, we will continue to save and use your personal data in accordance with the terms of this Privacy Policy, unless you receive other information in connection with the transfer.</p>
<p>Your rights: You have the right to object to our use of your personal data when it is based on a balancing of interests. If you object to such use, we will only continue to use your personal data if there are important reasons for doing so that outweigh your interests. See section 8 for information about your rights.</p>		

4 WHERE DOES YOUR PERSONAL DATA COME FROM

- 4.1 The personal data we use about you comes from different sources. Data such as name, e-mail address, personal identity number and telephone number submitted in connection with the registration of a user account, an application, the entering of an agreement, and when using our products and services. We also collect personal data about, for example, residential address from public registers and partners.
- 4.2 In order to enter into an agreement with us at DNB and in order for us to be able to provide you with our products and services, it is a requirement that you provide us with certain personal data. If you do not provide the data we need to run our business, we are unfortunately unable to enter into agreements with you or provide you with our products or services.

has the authority to amend the decision if it is found to be incorrect.

5 HOW LONG DO WE STORE YOUR PERSONAL DATA FOR?

- 5.1 We will only retain your personal data for as long as it is required for the purposes for which we collected the data according to this Privacy Policy. When we no longer need to retain your data, we delete it from our systems, databases and backups. In the tables above under section 3 you can see how long we save personal data about you for different purposes.

We may also need to save your personal data for other reasons, such as to meet legal requirements or to protect our legal interests or any other important public interest.

6 WHO DO WE DISCLOSE YOUR PERSONAL DATA TO?

6.1 DNB may, within the framework of current bank secrecy rules, disclose your personal data to third parties, such as to other group companies, as well as to IT suppliers and companies we collaborate with, in order to provide our products and services. In some cases, we may also need to provide information at the request of authorities such as the Swedish Financial Supervisory Authority, the Swedish Tax Agency, and the Swedish Social Insurance Agency, or to other parties in the context of judicial or corporate acquisition processes or the like.

We will not sell your personal data to anyone else.

7 WHERE DO WE USE YOUR PERSONAL DATA?

7.1 DNB strives to always process your personal data within the EU/EEA. In some cases, we may transfer your personal data to countries outside the EU/EEA. If personal data is transferred to any such country, we will ensure that the personal data continues to be protected and that the transfer is made in a lawful manner.

7.2 When transferring to a non EU/EEA country that does not ensure an adequate level of protection for personal data, we use the EU Commission's standard contractual clauses for the transfer of personal data to countries outside the EU/EEA. You can find them here: http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm.

8 YOUR RIGHTS

8.1 Our responsibility for your rights

8.1.1 As the data controller, DNB is responsible for ensuring that your personal data is used in accordance with law and that your rights are observed. You can contact us at any time if you want to exercise your rights. You will find our contact details at the bottom of this Privacy Policy.

8.1.2 DNB is required to respond to your request to exercise your rights within one month of hearing from you. If your request is complex or if a large number of requests have been received, we are entitled to extend the time by two months. If we are of the opinion that we cannot do what you want us to do, we are obliged to, within one month of receiving your request, inform you why we cannot do what you want us to do, and inform you that you are entitled to submit a complaint to the supervisory authority.

8.1.3 All information, and communication, as well as any action we take, are free of charge to you. If however, your request in connection with your rights is clearly unfounded or unreasonable, we are entitled to charge an administrative fee to provide you with the information or implement the requested action, or to refuse to comply with your request.

8.2 Your right to access, rectification, deletion, and limitation

8.2.1 You have the right to request from DNB

- a) Access to your personal data. This means that you have the right to request a transcript of our use of your personal data. You also have the

right to receive free of charge a copy of the personal data we use. For any additional copies, we are entitled to charge an administration fee. If you make a request in electronic format, such as via e-mail, we will provide you with the information in a widely used electronic format.

- b) Rectification of your personal data. We will at your request or on our own initiative correct, anonymise, erase or supplement any information that we discover is inaccurate, incomplete or misleading. You are also entitled to add information if any relevant information is missing.
- c) Erasure of your personal data. You have (as of May 25th, 2018) the right to request that we erase your personal data if there is no longer an acceptable reason for us use it. Erasure should therefore take place if:
 - (i) the personal data is no longer required for the purpose we collected it for,
 - (ii) we use your information on the basis of your consent and you revoke this,
 - (iii) you object to our use of your data, made following a balancing of interests, and we do not have any important interests that outweigh your interests and rights,
 - (iv) we have used the personal data in an unlawful manner, or
 - (v) we have a legal obligation to erase the personal data.

However, there may be requirements in law or another compelling reason that will prevent us from immediately erasing your personal data. We will then stop using your personal data for purposes other than complying with the legislation or anything required by any other compelling reason.

- d) Limitation of use. This means that we temporarily limit the use of your data. You have (as of May 25th, 2018) the right to request a limitation when:
 - (i) you consider your data to be incorrect and you have requested a rectification in accordance with point 8.2.1 b), while we investigate the accuracy of the data,
 - (ii) the use is unlawful and you do not want the data to be erased,
 - (iii) we, as the data controller, no longer need the personal data for our intended use but you need it in order to be able to determine, assert, or defend a legal claim, or
 - (iv) you have objected to its use in accordance with point 8.3.1, while waiting for a review of whether our important interests outweigh yours.

8.2.2 We at DNB will (as of May 25th, 2018) take all reasonable steps we can to notify all persons who have received personal data in accordance with section 6 above, if we have rectified, erased or restricted access to your personal data after you have asked us to do so. Upon your request, we will inform you of who we have disclosed personal data to.

8.3 Your right to object to use

- 8.3.1 You have the right to object to any such use of your personal data made by us on the basis of a balancing of interests or general public interest (see section 3 above). If you object to such use, we will only continue to use it if we have important reasons for continuing the use that outweigh your interests.
- 8.3.2 If you do not want DNB to use your personal data for direct marketing purposes, you always have the right to object to such use by contacting us. Once we have received your notice of objection, we will cease using the personal data for this marketing purpose.

8.4 Your right to revoke consent

- 8.4.1 For any use where we use your consent as a legal basis (see section 3 above), you can revoke your consent at any time by contacting us. You will find our contact details at the bottom of this Privacy Policy. If you revoke your consent, you may not be able to use our products and services in the intended way.

8.5 Your right to data portability

- 8.6 You have (from May 25th, 2018) the right to data portability. This means a right to obtain some of your personal data in a structured, widely used, and machine-readable format and to transfer this data to another data controller. You only have a right to data portability when the use of your personal data is automated and we base our use on your consent or on an agreement between you and us. This means that you, for example, have the right to obtain and transfer any personal data you have entered in order for us to be able to fulfil the agreement with you.

8.7 Your right to complain to the supervisory authority

You have the right to submit any complaints about our use of your personal data to the Finnish Data Protection Authority.

9 WE PROTECT YOUR PERSONAL DATA

You should always be able to feel safe when you submit your personal data to us. DNB has therefore taken appropriate security measures to protect your personal data against unauthorised access, modification and deletion. If any security incidents occur that may affect you or your personal data in a significant way, such as when there is a risk of fraud or identity theft, we will contact you and tell you what you can do to minimise the risk.

10 CHANGES TO THIS PRIVACY POLICY

DNB has the right to change this Privacy Policy at any time. When we make changes that are not purely linguistic or editorial, you will receive clear information about the changes, and what they mean to you, before they take effect. If we require your consent in order to be able to fulfil our commitment to you and you do not agree to the amended terms, you have the right to terminate the agreement with us before the terms come into force.

11 CONTACT DETAILS

Do not hesitate to contact us at DNB if you have any questions about this Privacy Policy or our use of personal data. In that case, please contact:

Data protection

DNB Bank ASA, Finland branch, org. no. 1817507-9

Postal address: Urho Kekkosen katu 7B, 00100-Helsinki

Dataskyddsbudet@dnb.se

Telephone: +358105482100

If you would like to order a transcript or if you would like to use your rights, please use the template on our website and contact:

Dataprotection

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