

Principles of processing Personal data

The principles how Swedbank processes Personal data are described in these Principles of processing personal data, hereinafter also referred as the Principles. Swedbank is the Controller for the processing. Contact data can be found in the end of this document.

The Principles apply if a Client uses, has used or has expressed an intention or use or is in other way related to any of the services provided by Swedbank, including to the relationship with the Client established before these principles entered into force.

1. Definitions

<i>Client:</i>	any natural person who is uses, has used or has expressed a wish to use or is in other way related to any of the services provided by Swedbank.
<i>Personal data:</i>	any information directly or indirectly related to the Client.
<i>Processing:</i>	any operation carried out with Personal data (incl. collection, recording, storing, alteration, grant of access to, making enquiries, transfer, etc.)
<i>Swedbank:</i>	Swedbank AB (publ) and any subsidiary.
<i>Processor:</i>	

2. General provisions

- 2.1 These principles describe how Swedbank processes Personal data on a general level. Specific details on the Processing of Personal data might be also described in agreements and other service related documents.
- 2.2 Swedbank ensures, within the framework of applicable law, the confidentiality of Personal data and has implemented appropriate technical and organisational measures to safeguard Personal data from unauthorised access, unlawful processing or disclosure, accidental loss, modification or destruction.
- 2.3 Swedbank may use authorised Processors for processing Personal data. In such cases, Swedbank takes needed steps to ensure that such Processors process Personal data under the instructions of Swedbank and in compliance with applicable law and requires adequate security measures. (Processor).
- 2.4 Swedbank's cookie policies are available on Swedbank's websites:
www.swedbank.lu/swedbank-management-company/

3. CATEGORIES OF PERSONAL DATA

Personal data may be collected from a Client, from the Client's use of the services and from external sources such as public and private registers or third parties. Personal data categories which Swedbank primarily, but not only, collects and processes are:

3.1 Identification data

1. *Identification data*
such as name, personal identification code, date of birth, data regarding the identification document (such as copy of the passport, ID card) etc.
2. *Contact data*
such as address, telephone number, email address, language of communication etc.
3. *Family data*
such as information about an individual's family and relationships.
4. *Insurance services related data*
such a Family data, data related to legal representatives, beneficiaries, insured persons, heirs etc.
5. *Data about the relationships with legal entities*
such as data submitted by the Client or obtained from public databases or through third party service providers for the execution of transactions on behalf of the legal entity in questions etc.
6. *Professional data*
such as educational or professional career, etc.

3.2 Financial data

1. Professional data

such as accounts, ownership, transactions, credits, income, liabilities, the Client's financial experience and investment objectives such as data collected during the selection and provision of investments service, investment or insurance services and other products carrying investment risk knowledge, trade requests or executed transactions in financial instruments etc.

2. Data on origin of assets or wealth

such as data regarding the Client's transaction partners and business activities, etc.

3. Data about trustworthiness ad due diligence

such as data about payment behaviour, damage caused to Swedbank or any third 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.

4. Data obtained and/or created while performing an obligation arising law

such as data resulting from enquiries made by investigative bodies, notaries, tax administrator, courts, and bailiffs, details of income, credit commitments, property holdings, remarks, historical remarks and debt balance

5. Data about the Client's tax residency

such as data about the country of residence, tax identification number etc.

3.3 Communication data

1. Communication data

collected when the Client visits Swedbank's branches, ATMs and other areas where Swedbank renders services or communicates with Swedbank via telephone, visual and/or audio recordings, e-mail, messages and other communication mechanisms such as social media, data related to the Client's visit at Swedbank's websites or communicating through other Swedbank's channels (such as internet- and mobile bank) etc.

2. Data related to the services

such as the performance of the agreements or the failure thereof, such as executed transactions, usage of ATMs, concluded and expired agreements, submitted applications, requests and complaints, interests and service fees, insurance experience, etc.

3. Data about habits, preferences and satisfaction

such as the activeness of using the services, services used, personal sittings, survey responses, hobbies, Client satisfaction, etc.

4. Data about participation in games and campaigns

such as the points gained, prizes won in games or campaigns, etc.

3.4 Special categories of data

such as a Client's health, Union Membership, fingerprints etc.

4. PURPOSE AND BASIS OF PROCESSING PERSONAL DATA

Swedbank processed Personal data primarily to:

1. Manage customer relations in general and provide and administrate access to products and services

To conclude and execute an agreement, for example a transaction, with the Client, keeping data updated and correct by verifying and enriching data through external and internal registers based on: performance of an agreement or in order to take steps at the request of the Client prior to entering into an agreement or compliance with a legal obligation; support Swedbank legitimate interest to keep personal data updated and correct.

2. Perform credit- and risk assessments

To carry out internal credit-and risk assessments in order to determine which services and products and on what terms can be offered to a Client and to comply with applicable law relating to credit-and other risk assessments when providing credits and other financial services, risk hedging and capital requirements for Swedbank, internal calculations and analyses based on: performance of an agreement or in order to take steps at the request of the Client prior to entering into an agreement or compliance of a legal obligation or Swedbank's legitimate interest to a sound risk management.

3. Protect interest of the Client and/or Swedbank

To protect the interests of the Client and/or Swedbank and examine the quality of services provided by Swedbank and for the purpose of providing proof of a commercial transactions or of other business communication (recorded onversations) based on: performance of an agreement or in order to take steps at the request of the Client prior to entering into an agreement or compliance with a legal obligation or consent from the Client or Swedbank's legitimate interests to prevent, limit and investigate any misuse

or unlawful use or disturbance of Swedbank services and products, internal training or quality assurance of services.

To guarantee the security of Swedbank and/or the Client, protect life and health of the Client and his/her representatives and other rights of Swedbank and the Client (visual and/or recording) based on: Swedbank's legitimate interest to protect its Clients, employees, visitors and theirs and Swedbank's assets.

4. Provide additional services, perform customer surveys, market analyses and statistics

Offer to the Client the services of Swedbank or carefully selected cooperation partners, including personalized offers, based on: consent from the Client or Swedbank's legitimate interest to offer additional services.

Perform Client surveys, market analyses and statistics; organize games and campaigns for a Client based on Swedbank's legitimate interest to improve Swedbank's services, improve the Client's user experience of services and to develop new products and services or consent from the Client.

5. Comply with legal obligations and verification of identity

To comply with applicable law, such as related to "customer due diligence" principle, prevent, discover, instigate and report potential money laundering, terrorist financing, if the Client is subject to financial sanctions or is a politically exposed person and to verify identity based on: performance of an agreement or in order to take steps at the request of the Client prior to entering into an agreement or compliance with a legal obligation or Swedbank's legitimate interest for a sound risk management and corporate governance.

6. Prevent misuse of services and ensure adequate provisions of services

To authorize and control access to and functioning of digital channels, prevent unauthorised access and misuse of those and to ensure the safety of information based on: performance of an agreement or take steps at the request of the Client prior entering into an agreement or compliance with a legal obligation or consent from the Client or Swedbank's legitimate interests to have control over authorisations, access to and functioning of Swedbank digital services.

Improve technical systems, IT-infrastructure, customizing the display of the service to the device and to develop Swedbank services such as by testing and improving technical systems and IT-infrastructure based on Swedbank's legitimate interests to improve technical system and IT-infrastructure.

7. Establishing, exercising and defending legal claims

To establish, exercise and defend legal claims based on: performance of an agreement or in order to take steps at the request of the Client prior entering into an agreement or compliance with a legal obligation or Swedbank's legitimate interests to exercising legal claims.

8. Execute transactions in international payment system

To fulfil obligations to execute international transactions via credit institutions and domestic payment via domestic, European and international payment systems based on: performance of an agreement or take steps at the request of the Client prior to entering into an agreement or compliance with a legal obligation.

5. PROFILING, PERSONALIZED OFFERING AND AUTOMATED DECISION MAKING

1. Profiling refers to the automatic processing of personal data used to assess certain personal characteristics of a Client in particular to analyse or predict, for example, the economic situation, personal preferences, interests, place of residence of such individual. Profiling is used to make analysis for Client advice, marketing purposes, for automated decision-making such as credit assessments, for risk management and for transaction monitoring to counter fraud and is based on Swedbank's legitimate interest, compliance with a legal obligation, performance of an agreement or consent from the Client.
2. Swedbank may process Personal data to improve the Client's user experience of the digital 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 general and personalised offers of Swedbank's services. Such marketing may such as be based on services the Client uses and on how the Client uses the services, and on how the Client navigates in digital channels of Swedbank.
3. Swedbank may also collect statistical data regarding the Client, such as typical behaviour and lifestyle patterns based in demographic household data. Statistical data for creating segments/profiles can be collected from external sources and may be combined with Swedbank internal data.

6. RECIPIENTS OF PERSONAL DATA

1. Authorities (such as investigative authorities, notary offices, tax authorities, supervision authorities and financial intelligence units).
2. Legal entities in Swedbank group.

3. Credit and financial institutions, insurance providers and intermediaries of financial services, third parties participating in the trade execution, settlement and reporting cycle (such as execution venues, such as regulated markets, multilateral trading facilities, organised trading facilities, systematic internalisers; trade repositories, approved publication arrangements, approved reporting mechanisms; local and foreign brokers).
4. Auditors, legal

7. GEOGRAPHICAL AREA OF PROCESSING

1. As a general rule the Personal data is processed within the European Union/European Economic Area (EU/EEA) but in some cases transferred and processed to countries outside the EU/EEA.
2. Transfer and processing of Personal data outside the EU/EEA can take place provided there is a legal ground i.e. legal requirement or Client's consent and appropriate safeguards are in place.
Appropriate safeguards such as:
 - there is an agreement in place including the EU Standard Contractual Clauses or other approved clauses code of conducts, certifications, etc., approved in accordance with the General Data Protection Regulation;
 - the country outside of the EU/EEA where the recipient is located has adequate level of data protection as decided by the EU Commission;
 - the recipient is certified under the Privacy shield (applies to recipients located in the United States).
3. Upon request the Client can receive further details on Personal data transfers to countries outside the EU/EEA.

8. RETENTION PERIODS

Personal data will be processed no longer than necessary. The retention period may be based on agreements with the Client, the legitimate interest of Swedbank or applicable law (such as laws related to bookkeeping, anti-money laundering, statute of limitations, civil law, etc.)

9. CLIENTS' RIGHTS AS A DATA SUBJECT

A client (data subject) has rights regarding his/her data processing that is classified as Personal data under applicable law. Such rights are in general to:

1. Require his/her Personal data to be corrected if it is inadequate, incomplete or incorrect.
2. Object to processing of his/her Personal data.
3. Require the erasure of his/her Personal data.
4. Restrict the processing of his/her Personal data
5. Receive information if his/her Personal data is being processed by Swedbank and if so then to access it.
6. Receive his/her Personal data that is provided by him/he and is being processed based on consent or in order to perform an agreement in written or commonly used electronic format and where feasible transmit such data to another service provider (data portability).
7. Withdraw his/her consent to process his/her Personal data.
8. Not to be subject to fully automated decision-making, including profiling, if such decision-making has legal effects or similarly significant 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 applicable law or if the Client has provided his/her explicit consent.
9. Lodge complaints pertaining to the use of Personal data to the Data Protection Authority CNPD (Commission Nationale pour la Protection des Données) if he/she considers that processing of his/her Personal data infringes his/her rights and interests under applicable law.

10. CONTACT DETAILS

1. Clients may contact Swedbank with any enquiries, withdrawal of consents, requests to exercise data subject rights and complaints regarding the use of Personal data.
2. For personal offering and marketing based profiling, which is done according to Swedbank's legitimate interest Swedbank ensured that clients can make their choices and use a convenient tool to manage their privacy settings.
3. The Client may change certain information, approvals and choices by calling Swedbank Management Company S.A.
4. Contact details of Swedbank are available on Swedbank websites:
www.swedbank.lu/swedbank-management-company/
contact details for inquiries: dataprotection@swedbank.lu

11. LATEST VERSION OF THE PRINCIPLES

The latest version of the principles is available at the branches of Swedbank, if you contact directly and on www.swedbank.lu/swedbank-management-company/