

## FOREX BANK PRIVACY POLICY (FINLAND)

### Information on processing of personal data

This policy describes how we process your personal data in accordance with the EU general data protection regulation, "GDPR". The GDPR is applicable from 25 May 2018 and replaces the Finnish Personal Data Act. Personal Data means any information relating to an identified or identifiable natural person, such as name, contact details, personal identification number, account number, and other information that directly or indirectly can be attributed to you as an individual person. If you have further questions you can contact us at tietosuojavastaava@forex.fi.

### Data Controller

We process your personal data, for instance, to provide the services you have ordered, to contact you as a customer, and to otherwise fulfil our duties and obligations as a bank. For these purposes, the data controller is FOREX Bank AB (FOREX Bank, Bank Aktiebolag, org. nr. 516 406-0104, visiting address: Stora Nygatan 27, 111 27 Stockholm, Sweden, tel: + 46 (0)10-211 1000 (switchboard), 09 417 1053 (customer service, Finland), email: tietosuojavastaava@forex.fi, homepage: www.forex.fi)

### Data Protection Officer

If you cannot find the information you are looking for in this Privacy Policy, or if you otherwise have questions on how FOREX Bank processes your personal data, you can contact our data protection officer at tietosuojavastaava@forex.fi tai by phone at 09 417 1053 (customer service).

### Purpose of personal data processing

FOREX Bank processes personal data to provide the services you have requested, and to otherwise carry out banking and related activities. The "Agreement" between you as the customer and FOREX Bank consists of you using one of our services, such as using or making an application for a private account, savings account, online banking, mobile banking, bank or credit card, consumer credit, loan protection, currency, online currency or exchange services, and other services.

In order to administer and keep records of the customer relationship with you, FOREX Bank processes personal data which are:

- provided together with your contact to us (by email, phone or otherwise), together with your application or your expression of interest;
- provided when entering into an agreement or in preparations thereto; or
- otherwise recorded when administering the contractual relationship with you, and for other measures, which have been taken before or after the conclusion of the agreement between you and FOREX Bank.

We also process personal data when you contact us as a customer, a future or past customer, and to handle questions and complaints. In addition to personal data relating to you, we process personal data relating to your potential representatives (such as financiers, guarantors, guarantee/warranty holders, fiduciaries etc.). If you call FOREX Bank, we may record your phone call. You will be informed about this before the recording commences. In order to maintain correct and up-to-date information, FOREX Bank may supplement the personal data by retrieving information from private and public databases, for instance by updating your address information from the population information system.

In addition FOREX Bank processes personal data in order to:

- acquire and verify personal data before making decisions (regarding e.g. granting a loan);
- manage concluded agreements; and
- fulfil FOREX Bank's legal and statutory obligations.

In addition, personal data are processed for market and customer analyses. The analyses are used for marketing purposes, model and business development, statistics, and risk management purposes. Risk management purposes also include processing information about borrowers and loans in order to assess credit quality for solvency requirement purposes.

Personal data can also be processed to provide financial advice and to provide information about FOREX Bank's services and products. If you do not prohibit sending direct marketing messages, personal data can also be used for direct marketing purposes and for sending offers.

In addition, FOREX Bank is under certain circumstances obliged under law to disclose and otherwise process personal data in order to fulfil its obligations towards the Financial Supervisory Authority, tax authorities, social security authority, police, and the enforcement authorities (both Finnish and foreign authorities). In addition, FOREX Bank is under certain circumstances obliged to disclose and process personal data to comply with laws and regulations relating to:

- accounting;
- anti-money laundering and combating the financing of terrorism;
- solvency requirements (risk management and quality assessment of loans)
- payment services legislation;
- transaction monitoring; and
- fraud control.

In such cases, personal data are processed for these specified purposes. Under certain circumstances, FOREX Bank is obliged (or has the right) to control its customer information against sanctions lists. Sanctions lists are checked so that we can ensure that we are entitled to provide certain banking services. Within the limits of banking secrecy legislation, personal data may also be processed in companies belonging to the FOREX group within or outside the EU/EEA (European Economic Area), and in companies with which FOREX group cooperates to provide its services. In such cases, personal data are processed for the above specified purposes. Due to our line of business, we are under a legal obligation to identify our customers in an unambiguous manner. To fulfil this obligation, we will under certain circumstances also process your personal identification number.

### Legal basis for processing of personal data

FOREX Bank processes your personal data to the extent this is necessary for the performance of a contract to which you are a party or in order to take steps prior to entering into a contract at your request. In addition, personal data are processed when it is necessary for compliance with FOREX Bank's legal obligations (e.g. fulfilling obligations towards the Financial Supervisory Authority, tax authorities, social security authority, police, or enforcement authorities. These obligations may relate to our legal obligations relating to accounting, anti-money laundering and combating the financing of terrorism, solvency requirements, payment services legislation, transaction monitoring, and fraud control.)

If you have explicitly given your consent to FOREX Bank's processing of your personal data for one or more specified purposes, such consent will form the legal basis for processing of your personal data. If we ask for your consent, you will receive detailed information about the processing subject to your consent and what your consent entails.

If FOREX Bank processes personal data more extensively than necessary for the purposes of performance of a contract or to comply with legal obligations, and the processing is not based on consent, the legal basis for such processing is FOREX Bank's legitimate interests. FOREX Bank has identified a legitimate interest for which the processing of personal data is necessary, and after careful assessment considered that your interests and

fundamental rights do not override FOREX Bank's legitimate interests in this particular case and do not require protection of personal data.

FOREX Bank has a legitimate interest to:

- conduct market and customer analyses;
- prepare marketing activities, model and business development, and statistics; and
- conduct direct marketing.

If personal data are processed for such activities, FOREX Bank's legitimate interests form the legal basis for such processing. The processing is necessary for purposes arising out of FOREX Bank's legitimate interests.

### Recipients of personal data

FOREX Bank is the main party receiving and processing personal data. Personal data are received from you or alternatively may be collected from public registers for supplementary purposes. In addition, the following other categories of recipients may participate in the receiving and processing of personal data:

- a) authorities in Finland and abroad to whom FOREX Bank is legally obligated to disclose information, as described above; and
- b) FOREX Bank's group companies within or outside the EU/EEA area, and companies with which the FOREX Bank group cooperates to provide its services, such as credit information companies, partners and subcontractors.

Under EU Payment Services Directive (PSDII), FOREX Bank is in some cases obliged to provide external payment service providers access to customer account information, provided customer has provided clear consent. In such case, personal data may be processed by an external payment service provider acting as personal data controller.

Your personal data may also be processed by X-change (X-change in Sweden AB), a subsidiary of FOREX Bank. X-change provides cashier services (currency exchange at exchange locations and online exchange services as well as currency purchases and transfers) and has access systems used by FOREX Bank for cashier services. Therefore, X-change is under certain circumstances the recipient of personal data processed by FOREX Bank relating to you.

### Transfer of personal data outside EU/European Economic Area

Under certain circumstances, FOREX Bank is obliged, in cooperation with the authorities, to transfer personal data abroad and outside the EU/EEA area. In addition, personal data may be transferred to a FOREX group company outside the EU/EEA area, and to a company with which FOREX Bank cooperates to provide its services.

All transfers of FOREX Bank personal data outside the EU/EEA area are made in compliance with the GDPR to ensure equivalent protection of personal data. Such transfers may be based on:

- EU Commission's decisions that the third country in question ensures an adequate level of protection; or
- other appropriate safeguards. In such cases, the recipient of personal data in a third country is subject to standard data protection clauses or binding corporate rules.

In the absence above mentioned grounds for transfer, FOREX Bank will obtain a specific authorization from the competent supervisory authority. Alternatively, you may explicitly consent to the transfer of personal data to third countries. If we ask for your consent for such transfer, you will be informed of the possible risks of such transfer. If you wish to have additional information about the safeguards applicable to the transfer of your personal data outside the EU/EEA, please contact tietosuojavastaava@forex.fi.

## For how long is my data stored?

FOREX Bank will retain your data as long as you remain our customer, i.e. as long as the agreement between you and FOREX Bank remains in force. After the customer relationship and the agreement terminates, your data will be retained so that we can answer to legal claims and to exercise our rights and fulfil our obligations in relation to potential claims and inquiries by former customers and authorities. FOREX Bank must process some personal data to address claims by authorities such as the Financial Supervisory Authority, tax authority, social security authority, police, and enforcement authorities, and to ensure compliance with rules pertaining to accounting, anti-money laundering and combating the financing of terrorism, solvency requirements, and applicable payment services legislation, transaction monitoring, and fraud control. Due to these statutory requirements, we are obligated to retain personal data also when you are no longer our customer. For the above reasons, your data will be retained for a maximum period of 10 years after the agreement has terminated and your customer relationship with FOREX Bank ceased.

If you contact FOREX Bank but do not enter into an agreement with us, your personal data will generally be retained for a maximum period of 3 months. Due to obligations arising out of the applicable anti-money laundering legislation, we may, however, retain your personal data longer.

If you do not enter into an agreement with FOREX Bank, the legal basis for the processing of your personal data is FOREX Bank's legitimate interests. FOREX Bank has a legitimate interest to save your personal data to facilitate future communications, for instance if your loan application has been rejected, and soon after this you wish to make a new application. Processing the personal data is necessary to facilitate this procedure. FOREX Bank has after careful assessment considered that your interests and fundamental rights do not override FOREX Bank's legitimate interests in this particular case and do not require protection of personal data.

If you have accepted that your phone call will be recorded when calling to a customer service number, any such recording will be retained for a maximum period of three months. The legal basis for the processing of this personal data is FOREX Bank's legitimate interests. FOREX Bank has a legitimate interest to process the sound file for education purposes and to develop customer service. FOREX Bank has after careful assessment considered that your interests and fundamental rights do not override FOREX Bank's legitimate interests in this particular case and do not require protection of personal data.

Your phone call will be recorded if you conclude an agreement regarding loan protection over the phone. The call will be recorded because FOREX Bank has a legitimate interest to be able to prove that an agreement has been concluded. The sound file will be retained as long as it is necessary to prove that an agreement has been concluded with you. How long the sound file is retained, is based on whether you contest the insurance policy sent to you, whether you fail to make a payment for the insurance contribution, or whether you otherwise indicate that an agreement has not been made.

## Your rights

You can contact us with questions about the processing of your personal data by email at tietosuojavastaava@forex.fi or by calling 09 417 1053 (customer service). You also have the right to request one register extract which contains a summary of your personal data processed by FOREX Bank, and information on how such data is processed. To verify your identity, the register extract will be sent to you by registered mail. In addition, you have the right to:

- rectification (you can request that we rectify inaccurate personal data concerning you);
- erasure (you can request that we erase personal data concerning you the processing of which is no longer necessary);
- restriction of processing (you can request that we restrict the processing of personal data concerning you in some respects);
- right to data portability, i.e. you can request that we provide personal data provided by you to FOREX Bank in a structured, commonly used and machine-readable format if you wish to transmit those data directly to another controller.

## Direct marketing

You have at all times and free of charge the right to object to the processing of your personal data for direct marketing purposes. You can object to direct marketing by clicking the link in our email or by sending your request to tietosuojavastaava@forex.fi or alternatively by mail to FOREX Bank Aktiebolag to the following address: Stora Nygatan 27, 111 27, Stockholm, Sweden.

## Withdrawing consent

If FOREX Bank processes your personal data based on your explicit consent, you have the right to withdraw such consent at any time. To withdraw your consent, please inform us that you no longer accept the processing of your personal data based on your consent. Such withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

## Complaints

You have the right to lodge a complaint regarding FOREX Bank's processing of personal data with the competent supervisory authority, the Finnish Data Protection Ombudsman (www.tietosuoja.fi), tel. 029 56 66700.

## Why does FOREX Bank need your personal data?

If you have ordered, requested, or entered into an agreement regarding one of FOREX Bank's services, your personal data are necessary to conclude such an agreement. If you already are FOREX Bank customer, more detailed personal data may be required in order to continue providing the services, and in order to govern the existing contractual relationship with you.

You are only obligated to provide personal data to fulfil the obligations arising out of your agreement with FOREX Bank. If you do not wish to disclose your personal data, it may mean that FOREX Bank cannot offer services, support or information to you as a customer or otherwise relating to FOREX Bank.

## Automated decision-making and profiling

For marketing purposes, FOREX Bank will process personal data of bank customers, currency exchange customers and other customers such as loan applicants, those who made currency reservation or have requested or utilised our services. Such processing of personal data is in part done by internal categorisation and analysis of customer groups and overall consumer and customer behaviour in general.

In addition, profiling (automated processing of personal data to evaluate personal aspects) is conducted to form supporting data and statistical conclusions regarding customer analysis for marketing, method and business development. Personal data processed are those submitted by yourself to FOREX Bank and supplementary data from public registries such as the government personal address registry SPAR and other government agencies as well as creditors and financial institutes.

As a result of profiling, you may receive tailored marketing communications.

At any time, you have the right to object to the continued profiling and processing of your personal data for direct marketing purposes.

## From where have we received your personal data?

If FOREX Bank processes your personal data which you have not provided yourself, such data has been retrieved from the population information system or from TUPAS service in connection with your online banking identification. Personal data retrieved from other sources concern address information and your personal identification number, which is retrieved from TUPAS service.

## Currency customers – for those who order currency, exchange currency or use our currency services

FOREX Bank may request the contact information of currency customers (e-mail address and telephone number). Any provision of contact information is subject to your free choice. The contact information you provide may be used to contact you with information regarding the service you utilised as well as marketing and offers from FOREX Bank. If your consent is requested in a store location you will be provided with supplementary information regarding purposes and personal data processing on-site.

FOREX Bank provides its currency services also to non-bank customers. At our locations, customers can, for instance, buy or sell currencies. If you wish to conduct individual or multiple transactions with us or commence a customer relationship with FOREX Bank, we may have to verify your identity, age, and who your principal is. In addition, we may have to verify whether you are a politically exposed person and the domicile of your business. Furthermore, we may have to check European sanctions lists and acquire further information on the purpose and type of the business relationship. FOREX Bank has an obligation to take these measures as a part of anti-money laundering and combating of financing of terrorism activities, and to fulfil the applicable know-your-customer requirements. Your personal data is processed to meet these goals and requirements. FOREX Bank's legal obligations arising from the applicable anti-money laundering legislation form the legal basis for the processing of your personal data.

You are not obligated to provide personal data to us but if you choose not to provide personal data, it may mean that FOREX Bank cannot provide currency exchange services to you. FOREX Bank may be obligated to report to the Financial Intelligence unit when monitoring risks and discrepancies in transactions. In such cases, the information provided in the notification is confidential.

FOREX Bank may ask you to provide an identity document to verify your age.

We cannot enter into an agreement with individuals younger than 16 years of age (Sweden and Norway), or alternatively 15 years of age (Finland and Denmark)

## X-change – currency and cash services

X-change (X-change in Sweden AB) provides currency exchange services at exchange locations and online exchange services as well as currency purchases and transfers. X-change is owned by FOREX Bank and X-change serves as a representative for FOREX Bank. As an X-change customer, your personal data will be processed in accordance with FOREX Bank privacy policy.