

PRIVACY POLICY

1 GENERAL

- 1.1 DNB Bank ASA, Sweden branch, org. no. 516406-0161 ("**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 dataskyddsbudget@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.

Purpose: Administration and the fulfilment of agreements as well as for the purpose of safeguarding our legal interests in the event of a dispute

Personal data:

Contact details such as name, personal identity number, telephone number, e-mail address and address.

Data for the granting of credit such as bank details, employer information, information about debt reconstruction, and credit rating.

Login details such as e-mail address and BankID.

Recording and documentation of your contact with DNB.

Other personal data 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.

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.

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.

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.

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 9 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 9.		

Purpose: Marketing, including customised direct mail		
Personal data:		
<u>Contact details</u> such as name, phone number, e-mail address and address.		
<u>Surfing habits and visit history</u> such as what pages you visited on our (and third party) websites and how long the visit lasted.		
<u>Order and payment information</u> such as order history and payment information.		
<u>Demographic data</u> such as age, gender, marital status, address and education.		

<p>What we do: We use your personal data for our marketing and market segmentation. By segmentation we mean that we categorise our customer base based on demographic selection criterias, such as age, gender, marital status or place of residence for the purpose of sending you direct mail and information that is not customised, about offers, services, news and competitions.</p>	<p>Legal basis: Balancing of interests, as we assess that our interest in sending you general and segmented marketing outweighs your interest in protecting your personal data (for marketing via post, telephone and social media – and for marketing via e-mail, SMS, MMS and other automated systems if the requirements of the Swedish Marketing Act are met)</p> <p>Consent (for the marketing of third party products and services via email, SMS and MMS and other automated systems)</p>	<p>Storage time: If you are a customer of ours: The data is saved and used throughout the contractual relationship and for up to 12 months after the contractual relationship has ended. This assumes of course, that you are not opposed to receiving direct marketing during that period.</p>
<p>If you wish to receive customised offers and information about news and competitions specifically aimed at you, such as offers concerning specially priced service packages, we need your consent. We will then for example make an analysis of which months of the year you use our various products and services and with what frequency you choose to use them. We will also analyse your surfing habits on our website as well as your purchase and transaction history, but also your name, age, gender, marital status, address, and</p>	<p>Consent</p>	<p>If you are not yet a customer of ours: We have the right to save your data for the purpose of sending marketing to you, for up to 3 months from when we received your contact details. This assumes of course, that you are not opposed to receiving direct marketing. If you choose to become a customer of ours, then what is stated under the heading "If you are a customer of ours" becomes applicable.</p>

education in order to be able to offer you relevant information.		
<p>Your rights: You always have the right to require us to stop using your personal data for direct marketing purposes. You also always have the right to revoke your consent at any time when we need your consent to use your personal data. If you revoke your consent, you will no longer be able to receive information and offers that are specifically tailored to you. 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 9 for more information about your rights.</p>		

Purpose: Methodological and business development		
<p>Personal data:</p> <p><u>Contact details</u> such as name, phone number, e-mail address and address. <u>Purchase patterns</u> such as information about how you use our products and services and about your purchase patterns (for example, during which months you usually use our services). <u>Order and payment information</u> such as order history and payment information. <u>Recording and documentation</u> of your contact with DNB. <u>Demographic data</u> such as age, gender, marital status, address and education. <u>Surfing habits and visitor history</u> such as what pages you visited on our (and third party) websites and how long the visit lasted.</p>		
<p>What we do: We use your personal data for our marketing and customer analyses, which consist mainly of statistics, data from completed market segmentations, and customer satisfaction evaluations. We then use the results of our analyses as a basis for improving, replacing or developing new services, processes or working methods in order to meet the expectations and wishes of you and other customers, as well as to offer, manage and improve our customer service and to improve your experience with us. For example, we may want to use the personal data to improve our customer service, offer new packages or customise our website to suit the needs of you and other customers. However, we want to be clear that we always try to anonymise or pseudonymise your personal data to the extent possible for achieving this purpose.</p>	<p>Legal basis: Balancing of interests, because we assess that our interest in analysing the use of our products and services in order to improve, replace or develop new products and services, as well as our interest in working to meet the expectations and wishes of you and other customers, and to provide customer service, outweighs your interest in protecting your personal data.</p>	<p>Storage time: We save and use your personal data for this purpose during the contractual relationship and for up to 12 months thereafter.</p>

<p>If you are a customer of ours and have financed a car using one of our finance products, we use your personal data to transfer it to the dealer who supplied the car to you, as well as to the general agent for the relevant car brand that we collaborate with. We transfer e.g. the data in order for you to be able to obtain information from the dealer when you visit them, and you are interested, for example, in buying a new car and want to have easy-to-access information about your financing agreement, such as the duration of the agreement, and what it would cost to redeem the contract. We may also use your personal data for quality assessing of credits for capital requirement purposes, as a basis for financial advice, or for providing information about the DNB group's products and services.</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 9 for more information about your rights.</p>		

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

personal data for the same purposes that we specified in this Privacy Policy.		this Privacy Policy, unless you receive other information in connection with the transfer.
<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 9 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.

5 AUTOMATED DECISION MAKING

- 5.1 DNB uses automated processes for certain products and services when deciding whether to grant credit. Within the framework for these processes we use your personal data to create a profile of you which constitutes the basis for assessing whether you are suitable for being granted credit. Making the decision automatic means that an algorithm makes a decision and notifies you if you are to be granted credit, based among other things, on information about your income, your debts, and what expenses you may have, taking into consideration factors such as where you live and how many people are in your household. These processes help us to make fair and responsible decisions.
- 5.2 As a basis for DNB's automated decision making, a proprietary scoring model is used, where information partly is gathered from credit rating companies and partly constituted by internal information, concerning, among other things, present involvement with DNB and how this is managed, as well as previous involvement with DNB. The variables in the scoring model that affect the decision are, among other things, income, debts, credit activity, any payment defaults, the management of existing and previous credit and (if applicable) the attributes of the financed object.
- 5.3 If you have large debts, low income, or large expenses, it may affect your chances of borrowing money or the terms of any borrowing.
- 5.4 The automated decision making processes that we use are regularly tested and checked to ensure that they are fair, objective and effective.
- If you have any comments about the decision that is reached, you can contact us using the contact details you will find at the bottom of this document. We will

then review the data which the decision has been based upon and any additional information you give us. The review will be made by a person who has the authority to amend the decision if it is found to be incorrect.

6 HOW LONG DO WE STORE YOUR PERSONAL DATA FOR?

6.1 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.

7 WHO DO WE DISCLOSE YOUR PERSONAL DATA TO?

7.1 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.

8 WHERE DO WE USE YOUR PERSONAL DATA?

8.1 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.

8.2 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.

9 YOUR RIGHTS

9.1 Our responsibility for your rights

9.1.1 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.

9.1.2 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.

- 9.1.3 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.

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

9.2.1 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 9.2.1 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 9.3.1, while waiting for a review of whether our important interests outweigh yours.

9.2.2 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 7 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.

9.3 Your right to object to use

9.3.1 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.

9.3.2 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.

9.4 Your right to revoke consent

9.4.1 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.

9.5 Your right to data portability

9.6 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.

9.7 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 Swedish Data Protection Authority.

10 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.

11 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.

12 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:

The data protection officer
DNB Bank ASA, Sweden branch, org. no. 516406-0161
Postal address: SE-105 88 Stockholm
Dataskyddsbudet@dnb.se
Telephone: +46 (0)8-4734710

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:

Dataprotektion
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