

## FOREX BANK PRIVACY POLICY (SWEDEN)

### 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 Swedish 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 an individual person. If you have further questions you can contact us at [info@forex.se](mailto:info@forex.se).

### Data Controller

For your personal data being processed, for instance to provide the services you have requested, to contact you as a customer, and to otherwise fulfil our duties and obligations as a bank, the data controller is FOREX Bank AB (FOREX Bank, Bank Aktiebolag, org. nr. 516 406-0104, visiting address: Stora Nygatan 27, 111 27 Stockholm, telephone +46 (0)10-211 10 00 (switchboard), +46 (0)771-22 22 21 (customer service), email: [info@forex.se](mailto:info@forex.se), web page: [www.forex.se](http://www.forex.se)).

### Data Protection Officer

If you are unable to 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 email [dataskyddsbud@forex.se](mailto:dataskyddsbud@forex.se) or by phone at +46 (0)10-211 10 00.

### Purpose of personal data processing

FOREX Bank processes personal data to provide the services you have requested, and also to carry out banking services and related activities. The "Agreement" between you as the customer and FOREX Bank consists of you using one of our provided 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, exchange services and other services.

Personal data provided in relation to your contact with us (by email, phone or otherwise), together with your application or your expression of interest, 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, is processed by FOREX Bank in the purpose of administration and documentation of our customer relationship with you.

We also process personal data when you contact us as a customer, potential new or past customer relationship, including information on your representatives (such as financiers, guarantors, guarantee/warranty holders, fiduciaries etc.) and to handle complaints. If you call FOREX Bank, we may record your phone call and, in such case, you will be informed about this prior to recording. In order to maintain correct and updated information, FOREX Bank may supplement personal data by retrieving information from private and public registry's, for instance by updating your address information using the state-run personal address registry SPAR.

In addition, FOREX Bank processes personal data in order to gather and verify personal data before decisions (regarding the granting of a loan for instance) and to manage concluded agreements and to fulfil FOREX Bank's legal and contractual obligations. Also, personal data are processed for market and customer analyses, used for marketing purposes, model and business development, statistics and risk management purposes. Risk management also include processing information about borrowers and loans in order to determine credit quality for solvency requirement purposes.

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

Furthermore, FOREX Bank is in some circumstances obliged by law to disclose and otherwise process personal data in order to fulfil its obligations towards the Financial Supervisory Authority, Swedish Tax Agency, social security authority, police, and the enforcement authorities (both Swedish 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, solvency requirements (risk management and quality assessment of loans), payment services legislation, transaction monitoring and fraud. In such cases, personal data are processed for these specified purposes. FOREX Bank is obliged (or has the right) to control its customer information against sanctions lists to ensure that we are entitled to provide certain banking services, by law or authority decision. 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 in the provision of services. In such cases, personal data are processed for the above specified purposes.

### 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, Swedish Tax Agency, social security authority, police, or enforcement authorities). Such instances may relate to our legal obligations relating to accounting, anti-money laundering, combating the financing of terrorism, solvency requirements applicable payment services regulation, monitoring of transactions and fraud control.

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

To the extent 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 such cases 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, statistics and to conduct direct marketing. In cases where personal data are processed in the context of such activities, FOREX Bank's legitimate interests forms the legal basis for such processing necessary for purposes of FOREX Bank's legitimate interests as above.

### Recipients of personal data

For the personal data disclosed by you and gathered from public registries to supplement data, FOREX Bank is the main party receiving and processing personal data. In addition, the following categories of recipients may also receive personal data in some cases: a) authorities in Sweden and abroad to whom FOREX Bank is legally obligated to disclose information as described above, b) FOREX Bank's group companies within or outside the EU/European Economic Area, and companies with which the FOREX Bank group cooperates to provide its services, such as credit information companies. These include (UC, Upplysningscentralen), (Bankgiro-centralen, BGC), mobile bank ID (Finansiell ID-teknik), 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.

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

Under certain circumstances, FOREX Bank is obliged to transfer personal data abroad and outside the EU/European Economic Area, in cooperation with government authority. In addition, such 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.

In cases where FOREX Bank is controller of data to be transferred outside the EU/EEA, such transfers are made in compliance with the GDPR to ensure equivalent protection of personal data. This means that either, there exists a decision by the EU Commission on the third country in question and its ensuring of adequate level of data protection, or that other appropriate safeguards are in place in that the recipient of personal data in a third country is subject to standard data protection clauses or binding corporate rules. In the absence of above-mentioned grounds for transfer, FOREX Bank will obtain a specific authorization from the competent supervisory authority or, alternatively, your explicit consent to the transfer of personal data. If we ask for your consent for such transfer, you will be informed of any possible data protection risks of the transfer. If you wish to receive additional information on the safeguards applicable to the transfer of your personal data outside the EU/EEA, please contact [dataskyddsbud@forex.se](mailto:dataskyddsbud@forex.se).

### For how long is my data stored?

FOREX Bank will retain your personal data as long as you remain our customer, i.e. as long as the agreement between you and FOREX Bank remains valid. At the end of the customer relationship and upon agreement termination, your data will be retained by FOREX Bank in order to manage legal claims and to exercise our rights and fulfil our obligations in relation to potential claims and inquiries by former currency exchange and banking customers and in relation to authorities. FOREX Bank is required to process some personal data to address obligations in relation to authorities such as the Financial Supervisory Authority, Tax Agency, 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. Due to these regulatory 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 but may be stored further due to obligations under applicable anti-money laundering legislation.

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 to save your personal data to facilitate future communications, for instance if your account application has been rejected and you soon after wish to renew the application. Processing the personal data in this regard is necessary to facilitate this procedure and FOREX Bank has after careful assessment considered that your interests and fundamental rights do not override FOREX Bank's legitimate interests in this context and do not require protection of personal data.

When in contact with customer service and if you have accepted that your phone call will be recorded, 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, as 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.

If you request FOREX Loan Protection over telephone, your call will be recorded. This is done in order to document your request in preparation for your agreement with FOREX Bank. The recording will be saved for as long as it is needed for this purpose. Following your call, the written agreement along with mandatory information will be sent to you for signing.

### Your rights

You can contact us with questions about the processing of your personal data by email at [dataskyddsbud@forex.se](mailto:dataskyddsbud@forex.se), or by calling +46 (0)10-211 10 00. You also have the right to request a register extract containing a summary of your personal data processed by FOREX Bank along with information on how such data is processed. To verify your identity, a registry extract will be sent to you by registered mail.

In addition, you have the right to request rectification (request that we adjust inaccurate personal data), erasure (request that we erase personal data where the processing of such data is no longer necessary), restriction of processing (request that we restrict or limit the processing in some respects). Also, you may request data portability, meaning that you 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 to another controller.

### Direct marketing

At all times and free of charge, you may object to the processing of your personal data for direct marketing purposes. You can do so by clicking the unsubscribe link in our emails or by submitting your request to [dataskyddsbud@forex.se](mailto:dataskyddsbud@forex.se) or by mail to FOREX Bank Aktiebolag, Stora Nygatan 27,111 27 Stockholm.

### 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 do so, please inform us that you no longer accept the processing of your personal data based on your consent. However, 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 supervisory authority Swedish Authority for Privacy Protection (IMY), [www.imy.se](http://www.imy.se), telephone: 08-657 61 00.

### 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 provision of personal data is necessary to enter into such agreement. If you are already a FOREX Bank customer, additional personal data may be required in order to continue providing 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 in contact with 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 personal data not provided by yourself, such data has been retrieved from the public state-run personal address registry SPAR and credit information companies. Personal data retrieved from other sources relate to categories address information and credit eligibility information (creditworthiness).

### 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 currency services also to other than bank customers. At our exchange locations, you can for instance buy or sell currencies. If you wish to conduct individual or multiple transactions with us and otherwise engage in 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, the domicile of your business, check European sanctions lists and gather information on the purpose and nature 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 standards and obligations. FOREX Bank's legal obligations subject to anti-money laundering act and applicable anti-money laundering regulation form the legal basis for such processing of your personal data.

You are not obligated to provide personal data to us but if you choose not to, it may result in FOREX Bank's inability to provide currency exchange services. FOREX Bank may be obligated to report to the financial intelligence police when monitoring and assessing risks and discrepancies in transactions. Information in such reports is classified.

FOREX Bank may ask you to provide identification to verify your age. We cannot enter into an agreement with individuals younger than 16 years of age (Sweden and Norway), alternatively 15 years of age (Finland and Denmark).