

Data processing principles (privacy policy)

We care about customer privacy, therefore we ensure that all personal data of our customers at its disposal is processed and protected consistently with the applicable legal framework, as defined by our Data Processing principles.



1. Explanation of the terms.

In order for you to understand terms such as “Personal data” or “SEB Group” please get acquainted with our explanation:

- 1.1. **Personal data** – any information related to an identified or identifiable private person (including the customer, the customer’s representative, the true beneficiary, and the guarantor)
- 1.2. **Processing** – any activity carried out with personal data, such as collection, registration, organisation, structuring, storage, access, alteration, deletion, disclosure, transfer, limitation of data and other activities;
- 1.3. **Customer or “you”** – any person who uses, has used or has expressed willingness to use a service offered by SEB, as well as a person that is in any way related to the service (such as a representative, the insured person, a beneficiary, a guarantor, the user of the internet bank or a payment card, etc.);
- 1.4. **Customer data** – any information about the customer, including the customer’s personal data, and any confidential information about the customer and the transactions carried out by the customer;
- 1.5. **SEB Group** – Skandinaviska Enskilda Banken AB (publ), registered in the Kingdom of Sweden, registration No. 5020329081, and all of its related companies;
- 1.6. **SEB or “we”** – a legal person registered in Latvia belonging to SEB Group and acting as the controller of the customer’s personal data. The list and contact information of SEB Group companies is available on the website seb.lv.



2. General principles

We take care of your data, the security and confidentiality.

- 2.1. These principles provide information on the processing and protection realized by SEB of the personal data of customers and other private persons as well as the transfer of data of legal entities to third parties. In addition to the description of the principles, more detailed information about the processing of your personal data can be included in agreements for services, other documents related to services and on the website seb.lv.
- 2.2. SEB ensures that personal data should be processed on a legal basis, within the scope of specific purpose (goals) and only to the extent necessary for such purposes. SEB gives preference to the cases when the relevant purpose can be met without processing personal data, including, when possible, the anonymisation of personal data (the personal data conversion method as a result of which all the elements identifying the person are excluded from the personal data set, and attributing of such information to a particular private person, directly or indirectly, is rendered impossible).
- 2.3. We process your data for only as long as is necessary to meet any of the data processing purposes (such as ensure the performance of the statutory duties or resolve the likely differences, etc.).
- 2.4. SEB ensures that inaccurate personal data are corrected or deleted (or anonymised) at your request as well as by default, ensuring the carrying out of reasonable measures to ensure the actualisation of the data, for example, offering an option to carry out the relevant changes via internet bank.
- 2.5. When processing personal data, we respect privacy and security, the requirements laid down in the laws and regulations, as well as the recommendations issued by supervisory institutions, taking the necessary organisational, physical and information technology security measures.

- 2.6. We may also outsource the processing of personal data and confidential information about the customer to our counterparties (authorised data processors). Before doing that we ensure that our counterparties should follow our instructions applicable to data processing, including our security and confidentiality requirements as well as the requirements of the applicable laws and regulations.
- 2.7. When justified, we may ask you to submit your personal data, which are necessary for the evaluation or provision of the service. If we do not get the required data, we may refuse to provide the service.
- 2.8. You can contact SEB data protection officer at personasdati@seb.lv. You may contact the data protection officer in all cases related to the processing of your personal data.
- 2.9. Information on the processing of data and the use of cookies on our website, as well as information on data processing within the scope of the marketing events arranged by SEB is available on our website seb.lv.



3. Personal data and the purposes of the processing thereof

We want you to know how and why we use your data.

- 3.1. We mostly process the following categories of personal data for the following purposes:
 - 3.1.1. The data identifying the person (given name, surname, personal identity number, the date of birth, nationality, the data and copy of the document identifying the person, voice recording, video recording, etc.) to identify you;
 - 3.1.2. Contact information (phone number, address, and email address) for contacting you about the performance of the agreement and other matters;
 - 3.1.3. Family data (marital status, number of family members, their given name, surname, and age) to identify the persons related to the performance of the agreement, as well as to assess your creditworthiness and the suitability of the service to you;
 - 3.1.4. Tax residence data (country of residence, taxpayer's identification number, etc.) to exchange information related to taxes and transfer it to a third party consistently with the requirements of the law;
 - 3.1.5. Education background, experience and knowledge in the area of investing in order to assess the suitability and appropriateness of investment products to you;
 - 3.1.6. Financial data (income, expenses, assets, liabilities, insurance, investment objectives, risk tolerance, previous payment discipline, arrears, transactions in the account, information on the performance of the concluded agreements, information about dependents, etc.), education and lifestyle data to determine your solvency, review your consumption habits as well as to assess the suitability and appropriateness of the offered products, services and financial instruments;
 - 3.1.7. Data on the source of funds and assets, and activities carried out with them (employment, information on the employer, counterparties, business, etc.) in order to meet the requirements laid down in the Law on the Prevention of Money Laundering and Terrorism Financing and other regulatory enactments in the above mentioned areas, carrying out risk assessment and customer due diligence, as well as to ascertain whether the customer's creditworthiness and activities are consistent with our requirements;
 - 3.1.8. Data on financial instruments owned and transactions carried out with them (amount and currency, as well as other information that the central securities depository may request under the law) in order to ensure the exchange of information in accordance with the requirements of laws and regulations;
 - 3.1.9. Data on the relevant collateral to insure our risks and ascertain the customer's credit risk;
 - 3.1.10. Data about the relationship with legal entities (the data submitted engaging in third party transactions on behalf of legal persons) to ensure the performance of agreements for services or cooperation agreements;
 - 3.1.11. The data related to services (information on the performance of the agreement, the transactions carried out, the data on the usage of ATMs, requests, complaints, suggestions, etc.) for customer relationship management purposes and provide and administer services appropriately;
 - 3.1.12. The data on the health condition, disability or heredity (a special category of personal data) of the insured person for entering into the insurance contract, evaluating the insured risk (including the transferring of specific categories of customer data to reinsurance companies) and taking decisions on disbursements of insurance claims (including taking requests for medical staff and institutions that have carried out the medical check up of the insured person or have treated the insured person, requesting them to provide information about the results of the check-ups, diagnoses, the designated treatment etc.). The special category of personal data are processed for their principal business purposes only by SEB Dzīvības apdrošināšana, which is part of SEB Group and solely for the purposes mentioned herein.
- 3.2. In addition to the above, we also process data to:

- 3.2.1. evaluate applications, provide services, as well as enter into and perform agreements; for example, we can verify the transactions carried out on the basis of the agreement for services, update the received data, prepare data lists (e.g., customer lists), collect debts, review tax records of the transactions in financial instruments, etc.;
 - 3.2.2. evaluate and improve the quality of services through customer surveys and the analysis of telephone conversations;
 - 3.2.3. offer our own services as well as those of our counterparties, make tailored offers, as well as inform on the marketing activities carried out by us, including lotteries and drawings;
 - 3.2.4. carry out a statistical survey and analysis of market shares and other financial indicators of customer groups, products and services;
 - 3.2.5. manage and reduce potential or existing risks for us, as well as prepare activity reports;
 - 3.2.6. comply with the duties laid down in laws and regulations (including to comply with the requirements laid down in the Law on the Prevention of Money laundering and Terrorism Financing, the requests made by public authorities, submit tax declarations, ensure accounting data to the competent authorities, etc.);
 - 3.2.7. protect our rights and legitimate interests, as well as our customers, employees, visitors, and financial assets, transferring data to our legal advisers and dispute resolution institutions (arbitration, courts, etc.), providing evidence of the orders and transactions by recording telephone conversations, as well as carrying out video surveillance on our premises and territory;
 - 3.2.8. ensure organizational and administrative management and succession.
- 3.3. In some cases, we process the following publicly available information about you:
- 3.3.1. the data obtained from central government, municipal or other public databases, or from third parties – for all of the above purposes;
 - 3.3.2. the data obtained using search engines – for assessing the risks to be insured or the credit risk, as well as to comply with the requirements laid down in the Law on the Prevention of Money Laundering and Terrorism Financing.



4. Data processing based on legitimate interest

What is legitimate interest? Substantiated interest to carry out a specific action, which includes the processing of personal data, such as the interest to ensure security through carrying out video surveillance.

- 4.1. To ensure advanced services that are suitable to you, we process your data (except the special category personal data) for the following legitimate interests:
 - 4.1.1. To maintain and use uniform internal information technology systems, as well as customer databases, and to ensure a more efficient and competitive service;
 - 4.1.2. To monitor and assess the processes for the availability and provision of services, including the assessment and improvement of services;
 - 4.1.3. To assess and manage our risks;
 - 4.1.4. To carry out studies and analysis of market shares, customer groups, products, and services;
 - 4.1.5. To protect our rights (to review possible disputes, recording telephone conversations, and keeping electronic correspondence, taking minutes of the face-to-face communication, storing customer data after the termination of the contractual relationship, verifying the declared address in the database of the Office of Citizenship and Migration Affairs, etc.);
 - 4.1.6. To recover debts, assigning the agreement for services or the receivables resulting from them to the providers of debt recovery services and other third parties that we cooperate with;
 - 4.1.7. The security of infrastructure, service, information, employees, customers and visitors, and prevention of unlawful or other threats;
 - 4.1.8. Organisational and administrative management and succession, including the exchange of personal data between SEB Group companies for administrative purposes.
- 4.2. If the provider of the collateral (for example, the provider of the pledge) requires it to protect its legitimate interests, we have the right to transfer the customer's data to the requestor of the information.
- 4.3. To ensure security for our employees, visitors, and assets, we carry out video surveillance on our premises.
- 4.4. We would like you to know that, based on the reasons relating to your particular situation, you have the right to object, at any time, to the processing of your personal data, which is based on legitimate interests. We will carefully assess such a request, so that to ensure the respecting of your rights and freedoms.



5. Data processing based on laws and regulations

Sometimes the processing of your data is imposed under the law.

- 5.1. We process the above mentioned data of our customers and other private persons if it is our duty or right arising from the law.



6. Data processing based on your consent

If you have given your consent, you can withdraw it at any time.

- 6.1. If you have given your consent, we process your data to:
 - 6.1.1. carry out marketing activities (such as marketing campaigns, lotteries and drawings; for surveying customer habits and satisfaction, as well as to provide information about our services) in cases where your consent to such activities is required in accordance with regulatory enactments. For this purpose, we may transfer your data to other SEB Group companies;
 - 6.1.2. offer and advertise the products or services of our counterparties;
 - 6.1.3. get your data from data registers, in some cases;
 - 6.1.4. assess the insured risk and make the decision on the disbursement of the insurance indemnity;
 - 6.1.5. in other cases, providing the most comprehensive and clear information on the nature and consequences of the consent.
- 6.2. You have the right to withdraw your consent at any time. Withdrawing of your consent will not affect our processing of your data before the withdrawal of your consent. We aim to ensure that you have an option to withdraw your consent as effortlessly as when you gave it, and upon necessity we will give you all the information about the consent, the nature thereof, and the processing of personal data resulting from it.
- 6.3. We would like to inform you that, if you withdraw your consent given for the processing your personal data on your health condition, disability, or genetics for processing to SEB Dzīvības apdrošināšana, and which is essential for the provision of the service, the provision of that service would be rendered impossible.



7. Data processing in connection with the entering into the agreement for services and the performance thereof

To provide the service selected by you, we need your data.

- 7.1. We process your data in order we could take the measures necessary for entering and execution of the agreement on service chosen by you, as well as for assessment of the customer before entering into agreement and during the provision of the service.



8. Profiling and automated individual decision-making

We assess your data to provide the service which suits your needs.

- 8.1. For our marketing activities purposes, on a legal bases, we carry out customer due diligence and analysis (profiling), based on your data at our disposal (e.g., such as the products and services of SEB used by you, payment discipline, communication with us, transactions carried out with us, your acceptance or rejection of our offers, etc.).

- 8.2. The offer to enter into the agreement for the service may be based on automated individual decision-making (i.e., without the involvement of private persons). Automated decision-making gives you the opportunity to receive a response as soon as possible, however, if you believe that the automated decision is not justified, you have the right to request the reviewing of that decision. If you think the decision does not take into account any relevant circumstances, we encourage you to submit to us additional information and supporting documents about those circumstances. We will carefully reassess your request and provide a response.



9. The recipients of customer data

We transfer your data only to trustworthy counterparties.

- 9.1. We have the right to transfer customer data further to the parties specified below as well as to other third persons, subject to having the relevant legal basis. For us it is important that the counterparties to which we entrust your personal data ensure that such data are protected and processed consistently with the applicable laws and regulations as well as security standards. Such transferring of the customer data is in accordance with the duty of SEB to maintain the confidentiality of customer data (including the statutory duty of confidentiality required under the Credit Institution Law).
- 9.2. We transfer customer data to the persons, to which we have the right or duty to disclose the relevant data under the laws and regulations, including the following:
- 9.2.1. law enforcement authorities, investigating authorities, the Prosecutor's Office, the subjects of operational activities, notaries public, bailiffs, the State Revenue Service, the Financial and Capital Market Commission, the Office for Prevention of Laundering of Proceeds Derived from Criminal Activity, the Corruption Prevention and Combating Bureau, the Treasury, the State Audit Office, the Bank of Latvia, the Parliamentary Inquiry Commission and other persons specified in the Credit Institutions Law and other laws and regulations, for them to carry out their duties laid down in the laws and regulations;
 - 9.2.2. The State Revenue Service (the customer's given name, surname, address, account number, account balance, details of the amount of contribution into life insurance agreements or Tier 3 pension, the country of tax residence, taxpayers' number, etc.) to exchange and automatically transfer tax information;
 - 9.2.3. Other SEB Group companies and other credit institutions (data about the Customer's creditworthiness and payment history), to calculate the capital risk requirement and follow to the principles of responsible lending;
 - 9.2.4. The Credit Register of the Bank of Latvia and the Credit Information Bureau or any other default registry, on the customer's financial obligations to provide information about the customer's payment history for the users of the relevant register (for example, credit institutions and other creditors) pursuant to the requirements of the law. The customer can familiarise themselves with the customer's data included in the Credit Register in the relevant register.
 - 9.2.5. The central securities depository and other custodians of securities – the data about the financial instruments owned by the customer and transactions with them (the amount and currency, transaction volumes and amounts, other information that the central securities depository may request under the laws and regulations) to ensure the exchange of information with the central securities depository;
 - 9.2.6. SEB Group companies and the Latvian or foreign providers of financial services and credit institutions to comply with the requirements laid down in the Law on the Prevention of Money Laundering and Terrorism Financing, and ascertain the origin of the money used in the transaction;
 - 9.2.7. Skandinaviska Enskilda Banken AB (publ), registered in the Kingdom of Sweden, registration No. 5020329081, to prepare the consolidated financial statements.
- 9.3. We transfer customer data also to the following third parties:
- 9.3.1. The parties involved in the performance of the agreement for services (such as other SEB Group companies, intermediaries of payments, issuers of e-invoices, international payment card organisations, the providers of services involved in the provision of payment card and POS services, the providers of cash collection services, the providers of insurance services, brokers or agents, notaries public, guarantors, reinsurance undertakings, the providers of the collateral, the operators of the the financial instrument trading points, the operators of the settlement system, brokers, custodians, the providers of translation, printing, communications and postal services, the central securities depository or the brokers, which provide services to SEB in connection with the custody of financial instruments, billing and carrying out other activities, the providers of payment initiation services, and the providers of account information services, etc.);

- 9.3.2. The providers of payment services involved in the execution of transactions (payments, transactions in financial instruments, etc.), including SWIFT (the Society for Worldwide Interbank Financial Telecommunications), www.swift.com), taking into consideration that:
- 9.3.2.1. The providers of payment services involved in the transaction, which may also be established in a country with an inadequate level of protection of personal data (i.e., a country which is not a party to the European Economic Area (EEA) agreement and not included by the European Commission in the list of countries that have a sufficient level of protection of personal data); accordingly, SEB Group companies in Latvia may not ensure that customer data are processed in accordance with the same requirements as those laid down in the European Union (EU) Member State or other country with an adequate data protection level;
 - 9.3.2.2. The providers of payment services, which are related to the transaction or SWIFT, may be obliged to disclose information on the transaction and related customer data to the competent authority of the relevant country in cases provided for in the laws and regulations of the relevant country, such as for tax administration purposes and for preventing money-laundering and terrorism financing, etc.;
- 9.3.3. Public register databases (for example, the Commercial Register, the Population Register etc.) or depositaries, if we need to verify the accuracy of the customer data submitted to us and ensure the veracity thereof or carry out the activities related to financial instruments;
- 9.3.4. The Credit Register, the Credit Information Bureau to assess the creditworthiness of the customer and manage our credit risk, if this is necessary for the performance of the agreement for services and ensuring of our legitimate interests;
- 9.3.5. The person that provides services to the SEB (for example, the providers of audit services, the providers of IT and archiving services, legal advisers, the providers engaged in carrying out customer surveys, etc.);
- 9.3.6. The bodies governed by public law from which SEB will borrow funds to perform the agreements entered into by these entities;
- 9.3.7. The providers of insurance services in order to prepare the offer an ensure the insurance of the customer's collateral for the performance of services in accordance with the agreement for services or the collateral agreement related thereto. For the preparation of the offer, the data is transferred on the basis of a customer's request (spoken, on the phone or written (including via e-mail or SEB internet bank));
- 9.3.8. Third party service provider (paying authority) to provide the customer with the Open API Services (account information, asset valuation, and paying services) for which the customer has applied.



10. The place of processing customer data

We will transfer your data outside the EU or EEA only in exceptional cases, subject to taking appropriate security measures.

- 10.1. Generally, we process your data in the EU or the EEA, however, there may be cases when the customer's data are transferred outside the EU or EEA.
- 10.2. We transfer the customer data for processing outside the EU or EEA only when appropriate security measures have been taken under the requirements of the laws and regulations and if:
- 10.2.1. this is required under the laws and regulations; or
 - 10.2.2. this is necessary to enter into or perform the agreement for the service; or
 - 10.2.3. the customer has given their consent to the processing of their data outside the EU or EEA.



11. Your rights concerning data processing

Your rights are important to us.

- 11.1. You have the right to request information about the processing of your data, as well as request us to delete or edit your data if they have changed or if they are inaccurate for another reason, to request restricting the processing thereof, or object to the processing of your data, the rights to data portability. In this case, a free-

form written application must be submitted (via internet bank or at SEB customer service centres) to the relevant company of SEB Group whose customer you are.

- 11.2. We respond to customers' requests within one month from the date of receipt thereof, at the latest. If for the provision of the response we need to specify the information or carry out a more detailed research, responding may require a longer period of time, of which we will notify you.
- 11.3. You have the right to request to delete your data. When we process personal data based on laws and regulations, or processing is required to ensure the performance of the agreement for the service, or to pursue our legitimate interest, the deletion of personal data may not be carried out, of which will notify you. In any case, we will assess your request and provide a reasonable response to you; in the event of a justified request to delete the data, we will ensure the deletion of the personal data in an appropriate manner.
- 11.4. You have the right to personal data portability, i.e. the right to receive the data provided to us by you, as well as transfer them to another data controller when it is technically feasible pursuant to the relevant laws and regulations.
- 11.5. Any disputes relating to the processing of customer data shall be resolved by way of negotiation. If no agreement can be reached by way of negotiation, the customer has the right to submit a complaint to the Data State Inspectorate of the Republic of Latvia (www.dvi.gov.lv) or a claim to a court of the relevant jurisdiction of the Republic of Latvia.



12. Application and amendments of the data processing principle

We will keep you updated of any changes!

- 12.1. These data processing principles apply to the processing of the personal data of all SEB customers and other private persons even if the legal relationship with the customer or other private person has been established prior to the entry into force of this document.
- 12.2. These data processing principles apply also to legal entities regarding SEB's rights to transfer their customer data to the data recipients indicated in these principles.
- 12.3. Considering that we have been constantly developing our activity and improving the services provided to you, we may unilaterally modify or supplement these principles from time to time, insofar not provided otherwise in the laws and regulations or service terms. In which case, we will let you know. The current version of the Data processing principles is available on our website seb.lv.