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GENERAL MATTERS I

1. Introduction

With this privacy policy (hereinafter "the Policy") we aim to inform you about processing of personal data carried out by SEB companies in Latvia.

Please, take a moment to explore the topics that are of interest to you. Should you have any questions, do not hesitate to contact our data protection officer whose contact information is provided in Chapter 2 of this Policy.

Considering that we are constantly developing our operations and improving the services provided to you, we may modify and supplement this Policy unilaterally. The current wording of the Policy is available on the seb.lv website.

Your Personal Data is processed in accordance with the General Data Protection Regulation (EU) 2016/679 (hereinafter "GDPR"), the Personal Data Protection Law, and other laws and regulations. The terms used in GDPR and other laws and regulations are used in this Policy.

You (as a data subject) – a natural person (an existing or potential customer, his/her representative, family member, guarantor, collateral provider, insurance policyholder, insurance beneficiary, heir, etc.) whose Personal Data we process.

Personal data means any information related to an identified or identifiable data subject.

SEB Latvia or **we** are SEB companies in Latvia – any legal entity owned by the SEB Group with the legal address being in Latvia. A list of SEB Latvia companies and their contact information is available on the seb.lv website. Within this Policy, SEB Latvia may mean AS SEB banka, SIA SEB līzings, AS SEB atklātais pensiju fonds, Investment Management Joint Stock Company SEB Investment Management, SEB Life and Pension Baltic SE, or all of the aforementioned companies together.

SEB Group is Skandinaviska Enskilda Banken, AB (publ.), a company established in Sweden, as well as legal entities with all of their branches owned by it directly or indirectly.

Our website seb.lv contains information about the use of cookies on our websites.

2. Data protection officer's contact information

With regard to any matters related to Personal Data processing, please contact the data protection officer of SEB Latvia by e-mail: personasdati@seb.lv or by post at the following address: Meistaru 1, Valdlauči, Ķekava parish, Ķekava region, LV-1076, Latvia.

Please see Chapter 12 of the Policy for a more detailed explanation of Introduction your right to inquire about the processing of your Personal Data.

DATA

3. What data related to you do we process

3.1. We process Personal Data in the following categories:

- 1) **general personal and identification data**, such as your name, surname, personal ID number, date of birth, identity document data (including document copies) and other data;
- 2) **contact information** – telephone number, electronic mail address, contact address and other data;
- 3) **information on your behaviour patterns on our websites**, including information on when and where our internet bank, website and other electronic platforms have been accessed, IP address and other data;
- 4) **information on your financial literacy**, for example, education, knowledge and experience in investing;
- 5) **information on your transactions within SEB Latvia** – these are data regarding the services received by you, including bank account number, payment orders, payment instruments, as well as any actions performed with them, cash deposits and withdrawals (including ATM transactions), inquiries, complaints, information about contract execution and similar data;
- 6) **financial data**, for example, origin of funds and assets, registered tax residence country, accounts, payment documents, financial liabilities, payment discipline, asset types and value (including financial instruments and transactions involving them), security and its respective data, credit history and creditworthiness, your expenses and income, financial and investment goals, risk tolerance, account transactions, information about dependants and similar data;
- 7) **information related to your economic activity** – information about your workplace, employment, your economic or commercial activity (agriculture, self-employment, etc.), business partners, income stability, as well as information about your other sources of profit;
- 8) **audio and video information**, for example, visual surveillance, video and audio recording during your visits to our customer service locations or when you contact bank employees.

NB: In relation to the insurance services provided by SEB Life and Pension Baltic SE, SEB Life and Pension Baltic SE processes **Personal Data regarding the insured person's state of health, disability or heredity** (special categories of Personal Data).

3.2. We receive certain categories of Personal Data of persons related to you, for example:

- 1) legal representatives (acting with relevant authorisation or on other basis);
- 2) insurance companies;
- 3) payers and payees;
- 4) co-contractors and parties to contracts;
- 5) beneficial owners;
- 6) your lenders, creditors;
- 7) your family members.

3.3. Furthermore, we may receive your Personal Data if you are related to our customers – legal entities, for example, if you are:

- 1) the general manager of a company;
- 2) a shareholder;
- 3) a member of the board or other administrative body;
- 4) a representative of a company, acting under a respective authorisation, or if you are specified as the contact person.

4. What are the grounds for processing your data

We receive and process your Personal Data in the following cases:

- 1) if you intend to conclude or have concluded a contract with SEB Latvia;
- 2) if you have given your consent to Personal Data processing;
- 3) if processing of your Personal Data is possible on the grounds of laws and regulations;

- 4) for the purposes of our legitimate interests, for example:
- to improve the quality of our services, ensure consistency and sustainability of operations, comprehensibility of our services, as well as their adaptation to your wishes;
 - to defend legal interests (for example, to defend legal claims, pursue claims in court) and take other legal action in order to avoid or minimise losses;
 - to systematically look out for and avoid any unlawful actions, we regularly assess the related risks (for example, unauthorised use of payment cards or other means of payment issued to you by the bank, etc.).

If you have **expressed an interest to receive a service offered by us or have expressed an intention** to conclude a contract with SEB Latvia, we are entitled to process your Personal Data for the purposes stated in item 1) above. On these grounds we will continue to process your Personal Data for as long as you receive our services or while the contract is in effect. Depending on the services provided, these grounds can be combined with other grounds for Personal Data processing.

In some cases, processing of your Personal Data is required or allowed by particular **laws and regulations**; hence we will process Personal Data when it is our obligation or right arising from laws and regulations, for example – to meet requirements in the area of money laundering prevention.

We process Personal Data based on our **legitimate interests** substantiating our desire to provide you with suitable and modern services, to maintain and use uniform internal information technology systems and customer data bases, as well as to ensure efficient and competitive services.

We urge you to familiarise with Chapter 11 of this Policy, which outlines important aspects in relation to revoking consent to Personal Data processing, if the service is provided, in order to ensure the provision of the service, or to serve our legitimate interests.

NB: If you do not submit to us your Personal Data necessary for the conclusion and/or execution of a contract, or the processing of which is prescribed by requirements of laws and regulations or a contract, we will not be able to provide our services to you.

5. What are our purposes for processing your data

- We process your Personal Data for the following main purposes:
- 1) for the provision of our services (inter alia, to defend our rights);
 - 2) for marketing needs;
 - 3) for identification, assessment, documentation and securing of risks in transactions with customers;
 - 4) for the protection of our and our customers' property;
 - 5) to perform our economic and administrative activities.

Within the scope of the main purposes, we also process your Personal Data for the following sub-purposes, for example:

To be able to identify you, we process your name, surname, personal ID number, date of birth, identity document data (inter alia, we make and store a copy of your personal identity document).

To provide services to you (including, to review your applications for services) and to adequately meet our contractual liabilities, as well as to fulfil the obligations prescribed by applicable legislation, we process your general personal and identification data, as well as the data related to your accounts, contracts and other transactions, and other information we receive when you use our services, including remote services (for example, services provided in our internet bank, mobile application or on other platforms).

To evaluate suitability and conformity of our products (including investment products and products related to financial instruments) with your interests, as well as to advise you on investments, we summarise Personal Data about your knowledge and experience in the financial investment field, income, current financial liabilities, financial goals and plans, as well as other information provided by you during meetings or remote consultations.

To assess your creditworthiness and to be able to offer you financing in line with the principles of responsible lending, to meet our operational risk management requirements, as well as to control your debt obligations towards the bank, we process the credit standing

data of you and your guarantor, as well as Personal Data related to the security provided to the bank. To assess execution of a contract and the ability to repay a loan, such Personal Data as information about your income, assets, financial liabilities, credit history, etc. may be processed.

Please note that, when taking a decision on the provision of services in accordance with applicable laws and regulations, including decisions on issuing a loan, we may rely on automated Personal Data analysis, which we conduct based on information related to your income, financial liabilities, as well as other circumstances that we deem significant. Such automated decisions enable you to receive a prompt response with regard to our offer. However, if you believe that important circumstances have not been taken into account in taking the automated decision, please provide us with additional information and documents confirming such circumstances.

To ensure organisational and administrative management and succession, which may include an exchange of Personal Data between companies within the SEB Group.

To ensure provision of remote services, we record telephone conversations or keep record of any other communication with you. For this purpose, we also store telephone numbers, electronic address, IP address, as well as content of communication and other technical data.

To ensure the safety of our employees and visitors, including the safety of your and our property, as well as to prevent and detect violations of laws and regulations, we carry out video surveillance and process your imaging data if you visit our customer service locations or use our ATMs. We also summarise and systematise information on any possible fraud and misuse of SEB Latvia services.

To be able to control our daily transactions and protect our legal interests, among other things, we may process information about judicial proceedings and administrative procedures that you are a party to, debts or other types of sums payable to third parties, and other information.

To improve our service quality, as well as to manage customer relations, we collect and use Personal Data related to our services, including inquiries, complaints and similar information.

To be able to send direct marketing offers (by phone, electronic mail, via our mobile application), to carry out marketing activities (campaigns, lotteries or raffles), to inform about and offer our services, including customised services, we carry out customer assessment (profiling) based on the Personal Data at our disposal, for example, about usage of our products and services, performed transactions, etc. For this purpose, we may transfer your Personal Data to other companies within the SEB Group.

We also summarise and analyse Personal Data to monitor and assess trends in our products and services, to understand, which parts of our products and services consumers are most interested in, as well as to improve our services, electronic platforms and their content.

For most of our marketing-related activities, such as providing information about our services, we process your Personal Data based on your consent, where required by laws and regulations. For example, your consent is not required to offer and advertise our services in our internet bank or mobile application.

In other cases, you have the freedom to revoke your consent to processing of your Personal Data.

To obtain your opinion about our services and their quality, when using customer surveys or within market research, we collect and use your Personal Data, including your electronic mail address and telephone number; we may also process such Personal Data as your age, gender, language of communication and other information.

To meet the requirements of applicable laws and regulations in the area of money laundering prevention and to evaluate you as our potential customer, we process Personal Data about your employer, your position, citizenship, business activity, business and cooperation partners, origin of financial resources, information on whether you are a politically exposed person, as well as other information necessary for customer research and for system maintenance to uncover unusual and suspicious transactions.

To comply with the obligations prescribed by laws and regulations, we process your Personal Data in order to submit reports to the Credit Register of the Bank of Latvia (Latvijas Banka); we also provide information to public authorities, investigating authorities and other law enforcement authorities within the scope and in situations as prescribed by the applicable laws and regulations. We also process your Personal Data in order to meet various solvency, accounting and audit requirements.

NB: In order to assess the insured risks when entering into an insurance agreement and taking a decision on the payment of an insurance indemnity in the case of an insured event, SEB Life and Pension Baltic SE processes Personal Data about the insured person's health condition, disability or heredity (special categories of Personal Data), inter alia, by processing information received from medical staff and institutions, which have run medical tests of the insured person or have treated the insured person, regarding test results, diagnoses, prescribed treatment, etc. In some cases, before concluding an insurance agreement, special categories of Personal Data may be transferred to reinsurance companies for assessment of the insured risk.

The aforementioned special categories of Personal Data are processed as part of its main business by SEB Life and Pension Baltic SE only. As part of its main business, SEB Latvia does not gather and process Personal Data regarding the state of health. However, we may process your Personal Data regarding the state of health or other similar data in situations where you or your contact persons disclose such data within the framework of our services. For example, when granting a grace period for the repayment of the principal amount of credit, we will process the respective Personal Data, because our decision will be based on the information provided by you or your representative.

DATA PROCESSING

6. Where do we get your personal data from

We use the Personal Data which you provide to us when you apply to use our services, when you fill out customer information forms, submit requests or file claims, as well as the data we document on the SEB Latvia website, our internet bank, and the data we obtain through video surveillance or telephone conversation records, as outlined in this Policy.

We may receive your Personal Data from other sources, for example, insurance companies, partners or other legal entities that render services with our help, our suppliers, other financial institutions, payment authorities, state, municipal and other public data bases or registers.

We may also process your Personal Data if data are provided to us about spouses, children, other relatives, guarantors, coborrowers, providers of security, insured persons, insurance beneficiaries, etc. Lastly, we process publicly available information about you, as well as Personal Data obtained using search engines – to assess insured risks or credit risks, as well as to meet requirements of laws and regulations (for example, in the area of international and national sanctions).

7. In what countries do we process your data

Normally we process your Personal Data in the territory of the European Union or the European Economic Area (EU/EEA). We may process Personal Data outside the EU/EEA, provided that adequate security measures are taken and at least one of the following requirements apply:

- 1) The European Commission has recognised that the respective country ensures an adequate level of Personal Data protection;
- 2) The recipient in the United States of America is certified under the so-called "Privacy Shield" agreement between the EU and the US;
- 3) There is an agreement to comply with the standard terms and conditions approved by the European Commission;
- 4) Codes of conduct and other security measures in line with the GDPR are applied.

NB: Providers of payment services involved in execution of a financial instrument or payment (including SWIFT payments) may be established or operate in a country which does not ensure an appropriate level of data protection (i.e., a country that has not joined the European Economic Area Agreement and has not been included by the European Commission in the list of countries with adequate level of data protection). We take all measures in order that your data are used in a secure way; however,

there is a risk that we will not be able to ensure that the data recipient observes the requirements laid down by the European Union in all cases. For this reason, before engaging in such transactions, we urge you to carefully evaluate the potential risks related to Personal Data processing.

8. How long do we store your data

We store your Personal Data for as long as it is necessary to serve the purposes, for which the Personal Data were obtained, or in compliance with the time-limits prescribed by laws and regulations, for example:

- 1) we process Personal Data collected to provide a service, while you continue using the respective service, and in some cases we store these Personal Data for a certain time period after you have received or discontinued using the service;;
- 2) for as long as necessary for archiving documents in accordance with the time-limits prescribed by laws and regulations.

9. What principles of data processing do we observe

In processing of your Personal Data, which you have entrusted to us, including Personal Data that we have obtained from other sources, we observe the following principles:

- 1) Your Personal Data are processed in a legitimate, fair and transparent manner in such way as to ensure the accuracy, correctness and security of the processed Personal Data (principle of legality, fairness and transparency);
- 2) Your Personal Data are collected for a specific, clearly defined and legitimate purpose and are not further processed in a way incompatible with these purposes (principle of purpose limitation);
- 3) To process your Personal Data for no longer than is necessary in relation to the purpose, for which they are processed;
- 4) Your Personal Data are adequate, up to date and only such that are required in relation to the purposes for which they are processed (principle of data minimisation);
- 5) The processed Personal Data are accurate and, where necessary, updated (principle of accuracy);
- 6) Your Personal Data are kept in a form that allows you to be identified for no longer than necessary in view of the purposes that the data are processed for (principle of retention limitation);
- 7) Your Personal Data are processed in such a way that application of relevant technical or organisational measures would ensure adequate personal data security, including protection from unauthorised or unlawful data processing and accidental loss, destruction or damage (principle of integrity and confidentiality).

In addition to what is laid down in this Policy, more information on the processing of your Personal Data may be included in service agreements or other documents related to the services rendered by SEB Latvia.

We may outsource any actions or functions that might include Personal Data processing. Before we do so, we will ensure that our outsourcing partners comply with our instructions with regard to data processing, including our security and confidentiality requirements, as well as requirements of applicable laws and regulations.

10. To whom do we provide your data

10.1. We transfer your Personal Data for processing based on the grounds for data processing stated in Chapter 4 of this Policy. If the grounds for Personal Data processing entails the provision of our services or a legitimate interest, Personal Data are handed over for processing, for example, to:

- 1) companies within the SEB Group, including Skandinaviska Enskilda Banken AB (publ), registration No. 5020329081, registered in the Kingdom of Sweden;
- 2) other banks and financial institutions;

- 3) providers of payments and other services involved in the execution of your chosen transactions (for example, to make a payment or to personalise a payment card), international payment card organisations, providers involved in the provision of payment card and POS services;
- 4) payment system operators;
- 5) payment initiation service providers, account information service providers, or other service providers, which use the open cooperation platform (Open Banking);
- 6) companies providing insurance services in cases where we render such services as intermediaries, or companies providing services that we use in relation to fulfil provisions of a collateral agreement;
- 7) stock exchanges, funds, brokers or other participants involved in the trade of financial instruments, which render services to us in relation to safekeeping of financial instruments, as well as directly or indirectly provide services in relation to investments in financial instruments and perform other activities;
- 8) guarantors, providers of collaterals;
- 9) our professional activity consultants, auditors, translation service providers, postal and courier service providers;
- 10) other third parties in relation to sale or merger of companies, complete or partial acquisition or reorganisation of companies, or in the introduction process of similar business changes (including, among other things, potential or existing buyers of the company and their consultants).

NB: At the same time, with regard to loans secured by a pledge or collateral, please note that the provider of the pledge or collateral may require us to provide information about the rights of the borrower for the purpose of protecting their legal interests. In such cases we provide to the provider of the pledge or collateral your Personal Data regarding the liabilities secured by the respective pledge or collateral.

- 10.2. We may transfer your Personal Data to persons to whom we have the right or obligation to disclose such data in accordance with requirements of laws and regulations, for example,
- 1) to the Financial and Capital Market Commission, the Bank of Latvia, the European Central Bank, as well as bodies performing operational activities, notaries, bailiffs, the State Revenue Service and other persons prescribed in the Credit Institution Law and other laws and regulations, so that they are able to perform their duties established by laws and regulations;
 - 2) to the Credit Register of the Bank of Latvia and the Credit Bureau, or to any other register of liabilities related to the customer's financial liabilities, in order to provide information to users of the respective register (for example, credit institutions and other creditors) about the customer's payment history in accordance with requirements of laws and regulations;
 - 3) in order to ensure information exchange with the central depository of securities, we transfer Personal Data in relation to the financial instruments owned by you and transactions performed with them;
 - 4) to courts, courts of arbitration or other dispute resolution bodies.

NB: For the purposes of Personal Data processing specified in this Policy, we may involve other service providers, making sure beforehand that their operation complies with requirements of the GDPR and applicable laws and regulations to ensure that Personal Data is protected and processed in compliance with the requirements of applicable laws and regulations.

YOUR RIGHTS

11. What are your rights?

- 11.1. You have the following rights:
- 1) the right to request information about processing of your Personal Data;
 - 2) the right to request rectification of incorrect, inaccurate or incomplete Personal Data;
 - 3) the right to limit the processing of your Personal Data until the lawfulness of your Personal Data processing is verified;
 - 4) the right to request erasure of your Personal Data;
 - 5) the right to not consent or revoke consent to Personal Data processing for direct marketing purposes, including profiling;

- 6) the right to request and receive Personal Data in a format convenient for you, if you have provided these Personal Data to us and their processing is automated based on a consent or execution of a contract, as well as if these Personal Data need to be transferred to another Personal Data controller, if technically feasible, pursuant to respective regulatory framework;
- 7) the right to revoke your consent without affecting the use of your Personal Data before the consent was revoked;
- 8) the right to file a complaint with the Data State Inspectorate (for more information, please visit www.dvi.gov.lv).

NB: If you revoke your consent to SEB Life and Pension Baltic SE to process your Personal Data regarding the insured person's state of health, disability or heredity, and if processing of these Personal Data is essential to provision of the service, the service of SEB Life and Pension Baltic SE will not be provided.

11.2. Please note that we will not be able to fully satisfy a request to erase Personal Data, if the Personal Data are processed on several grounds for personal data processing, for example, Personal Data can be simultaneously processed to execute a service contract, or to comply with obligations arising from applicable laws and regulations. In this event, we will not be able to ensure complete erasure of your Personal Data, of which we will inform you separately. In any case, we will carefully assess your request to ensure the most appropriate solution to respect your rights in situations where it is not possible to completely erase your Personal Data.

- 11.3. In situations where it is not possible to completely erase Personal Data, based on the principles of GDPR, we will ensure anonymisation or pseudonymisation of the Personal Data:
- 1) Within the framework of anonymisation of Personal Data, the data are irrevocably changed and can no longer be linked to a specific person. We are entitled to keep such data after the legal grounds for processing thereof have expired. Processing of such anonymous Personal Data can be continued, for example, for the purposes of statistics, and to improve and develop the services of SEB Latvia;
 - 2) Within the framework of pseudonymisation of Personal Data, an identifier is assigned to the data, observing a certain algorithm, so that the data is not instantly recognisable. By using this algorithm, it is possible to obtain the content of the Personal Data. Such data are considered Personal Data with increased data processing security level.

NB: A decision on which of the aforementioned solutions to apply in relation to Personal Data processing is made by SEB Latvia single-handedly in line with the GDPR principles.

12. How can you exercise your rights?

We make every effort to observe your rights and respond to any questions you may have regarding this Policy and the topics covered in it. You may file a complaint, application or request (hereinafter together referred to as the "**Request**") by addressing it to the data protection officer of SEB Latvia. Requests signed with a secure electronic signature should be sent to the e-mail address: personasdati@seb.lv. You may also submit a Request using our internet bank, or at our nearest customer service location.

We will respond to your Request within one month from the date of receipt. In exceptional circumstances requiring extra time, we will prolong the response time by giving you a notice about it in a timely manner.

We will assess your suggestions or objections regarding processing of your Personal Data; however, we will not always be able to fully meet your demands if the actions of SEB Latvia are in compliance with the requirements of the GDPR and other laws and regulations.

13. How can underage persons exercise their rights?

In relation to the services we offer to minors, we assess the possibility to allow the child to exercise certain rights independently.

In the cases prescribed by laws and regulations, as well as considering the child's awareness level and ability to decide on exercising their rights in certain matters, we will ask the child's legal custodian or guardian to provide consent or approval for Personal Data processing on their behalf.

NB: Parents or legal custodians are entitled to exercise all the rights in relation to their minor child before the age of 13 in Personal Data processing matters, as well as to supervise processing of data of their minor children regardless of the child's age.

OTHER MATTERS

14. Privacy policy expiry and amendments

This Policy becomes effective on 1 September 2019 and replaces the previous version entitled "Principles of Data Processing", which has been in effect from 8 January 2019.

This Policy may be modified or supplemented unilaterally due to amendments to laws and regulations or changes in our operation.

We will notify you about all changes in the Policy that are not related to requirements of laws and regulations 60 days in advance. Information about changes in the Policy will be available on our website seb.lv.

15. Confidentiality rules of SIA SEB lizings

With regard to using confidential information, regardless of whether you are a natural person or a legal entity, the following rules will be applied by SIA SEB lizings.

To ensure its operations and provide its services, as well as to meet the requirements prescribed by laws and regulations and protect its legal interests, SIA SEB lizings may transfer confidential information to other companies within the SEB Group, its cooperation partners (including, but not limited to – outsourced service providers, suppliers, companies that maintain public data bases or registers), as well as, insofar as it is required by laws and regulations, to public authorities.

SIA SEB lizings may process such confidential information also after the legal relations with the customer are terminated, insofar as it is permitted by laws and regulations, or to protect the legal interests of SIA SEB lizings.