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Your Privacy in DNB Bank ASA Finland Branch

Information on how we process personal data

Protecting your personal data

To ensure we earn your trust, we strive to be open about how we process your personal data.

Below you can read about how we process your personal data. You will also receive information about your rights and how you can exercise your rights in practice.

Data Protection in the DNB Group

DNB is an international financial group consisting of the parent company DNB Bank ASA and a number of Norwegian and international subsidiaries and branches. Together, this constitutes the DNB Group.

See a more detailed illustration of the legal structure of the DNB Group here.

The company within the DNB Group which you have a relationship generally acts as the controller for the processing of your personal data. You can read further about the DNB Group's processing of personal data in the privacy notices of the DNB group here: Privacy Policy | From A to Z - DNB.

The data controller

The data controller is responsible for determining what your personal data will be used for, how it will be processed and what aids and tools will be used.

DNB Bank Finland Branch, org.no 1817507-9 ("DNB") is a branch of DNB Bank ASA. DNB Bank ASA is therefore the controller and is responsible for the processing of your personal data. If you have any questions or inquires relating to the processing of your personal data, you may contact the branch at finlanddataprotection@dnb.no.

You can also contact out Data Protection Officer at personvernombudet@dnb.no.

What rights do you have when we process your personal data?

When we collect and process information about you, you have rights under data protection rules and legislation. Below, we will provide you with an overview of your rights, what they entail, and how you can exercise your rights.

We are obliged to respond to you as soon as possible and normally within 30 days at the latest. Sometimes we need some more time to respond to you. If so, we will provide you with an

explanation of why it is taking us longer to process your request and when you can expect a response from us.

How to exercise your rights

If you would like to exercise any of your rights described below, or have any questions about how we process your personal information, please contact us in writing at the following address:
Data protection e-mail: Finlanddataprotection@dnb.no

Data protection DNB Bank ASA, Branch, org. no 1817507-9
Postal address: Urho Kekkosen katu 7 B, 00100 Helsinki
e-mail: finlanddataprotection@dnb.no.
Phone: +358 10 548 2100

Complaints

We strive to continuously improve ourselves and our products and services that we offer you. If you are unsatisfied after having talked to us, you can submit a complaint by following the address above. When you submit a complaint, we will process your complaint as soon as possible.

If you do not agree with us and wish to complain further, you can send your complaint directly to the Finnish Data Protection Ombudsman.

Your rights

Right of access

You have the right to know whether we process your personal data. This means that you have a right to be given a copy of/access to this data. You also have the right to receive more detailed information about what personal data we process and how we process it.

There are some exceptions to the right of access. This typically applies where we have a statutory duty of confidentiality, or where we are required to keep information secret in the interest of preventing, investigating or prosecuting criminal acts. If DNB cannot provide you with the information you request, you will be notified of the reason for this in writing.

How to exercise your right of access?

If you would like to request information about the personal data, we hold about you (Data Subject Access Request), please contact us in writing at the address provided under **"How to exercise your rights".**

Right of rectification

If you believe that we are processing personal data about you that is inaccurate or misleading, you may require the data to be corrected or supplemented by additional information. You must be able to show that the data is inaccurate and inform us as to what is correct. After your enquiry,

we will make sure to correct the incorrect personal data as soon as possible, and normally no later than within one month.

There may be cases where rectification is not practically possible, or where the information is correct but gives an incorrect impression. In these cases, we will ensure that your data is supplemented with additional information. That is, we will include your understanding of the situation, so that others will have a comprehensive overview of your situation.

If we have corrected your personal data, and we have previously provided that data to any third parties, we will attempt to notify those recipients of the changes if relevant. The obligation to notify of any changes does not apply if it proves to be virtually impossible for the recipient to implement corrections.

How to request rectification or supplementation with additional information?

If you would like to request rectification or supplementation with additional information of your personal data, please contact us in writing at the address provided under **"How to exercise your rights".**

Right to object

The right to object gives you, in certain cases, the opportunity to request that we stop using your personal data. We will always consider and respond to such an objection.

When processing personal data for direct marketing purposes, you always have the right to object (right to opt out).

The right to object applies in different contexts with slightly different conditions:

- In cases where your personal data is processed because it is necessary to attend to a legitimate interest. Or because it is necessary to perform a task in the public interest. In such cases, you have the right to object on grounds relating to your particular situation. We address such objections specifically and individually. We may reject the objections if there are compelling reasons.
- In cases where your personal data is processed for direct marketing purposes without your consent. In these cases, we will always make sure to stop the processing of your personal data.
- If your personal data is processed for scientific or historical research purposes or for statistical purposes. In such cases, you may have the right to object on grounds relating to your particular situation. We will process your objection as quickly as possible, normally within 30 days.

How to exercise your right to object in DNB?

If you would like to object to a specific processing of your personal data, please contact us in writing at the address provided under **"How to exercise your rights".**

For a more detailed overview of what types of processing you can object to, see the chapter entitled **'Why we process personal data'**. You may always request that we stop using your personal data for marketing aimed directly at you, including profiling for such a purpose.

For any use where we use your consent as a legal basis, you can revoke your consent at any time by contacting us at the contact details above or by following the steps below. If you revoke your consent, you may not be able to use our products and services in the intended way.

Right to data portability

You have the right to receive certain personal data that we process about you so that it can be reused across different systems and services. The information you request is sent directly to you in a machine-readable format and may make it easier for you to transfer your information to a new service provider. This right is called 'data portability' and applies only to the personal data that:

- you yourself have provided directly, and
- is processed on the basis of your consent, or
- is processed on the basis of an agreement that we have with you.

Exceptions: You are not entitled to receive the following personal data, even if the above conditions are met:

- Personal data that is only available in paper form or as scanned documents in our electronic archives.
- The transfer of your data infringes the rights of others.
- Personal data that is not collected directly from you and is thus not covered by this right.
- Personal data prepared in analyses or assessments for internal use.

How to request to have your personal data in DNB transferred to others?

To request a portable copy of the personal data in scope of data portability, please contact us in writing at the address provided under **"How to exercise your rights".**

We will provide your data in a structured, commonly used and machine-readable format.

Right to erasure

If we process personal data about you, you have, in some cases, the right to demand that your data will be deleted.

You may request the erasure of personal data if one of the following grounds is met:

- You withdraw your consent for the processing.
- You have objected to the processing of the data that you request to be deleted, and your objection is upheld. See more about the right to object above.
- The data you request to be deleted has been processed unlawfully.

- The information must be deleted in order to comply with a legal obligation to which we are subject.

In many cases, we are required to retain information about you, even if you request erasure. This applies both during your customer relationship, and for a certain time after agreements and your customer relationship has ended. In practice, this means that you cannot demand that your personal data be deleted when we have a legal obligation to retain your personal data or we must safeguard our legitimate interests. This also applies if we need to establish, exercise or defend a legal claim.

How to exercise your right to erasure in DNB?

If you wish to request the erasure of your personal data, please contact us in writing at the address provided under **"How to exercise your rights".**

Right to restrict processing

You may request that we restrict the way we process your personal data. This means that we cannot use your personal data actively. This is often in combination with other rights, for example to restrict the processing of your personal data while we consider a request for erasure or rectification.

For example, if you have asked us to correct your personal data, you can in the meantime request that we restrict the processing of this data until the error has been rectified.

We are obliged to restrict processing in some specific cases:

- If you believe that the personal data is inaccurate, the processing may be restricted to a period so that both you and DNB can check whether the personal data is correct and perform corrections if necessary.
- If the processing is unlawful, but you oppose the erasure of the personal data and requests the restriction of the use instead.
- If we no longer require the data for the purpose of the processing, but we need the data to establish, enforce or defend a legal claim and therefore wish to retain your personal data.
- If you have objected to the processing and are awaiting feedback on the assessment of whether we have legitimate reasons for continued processing that take precedence over your interests.

How to restrict the processing of personal data in DNB?

If you would like to restrict the way we process your personal data, please contact us in writing at the address provided under "**How to exercise your rights".**

What type of personal data do we process and where do we collect it?

Types of personal data

Depending on your relationship with us and the products and services you use, we process the following types of personal data:

- **Identification data:** full name, gender, Finnish national identity number, temporary identification number (D number), customer number, copy of passport, driving license.
- **Contact details**: name, address, telephone number, email address.
- **Business relations**: profession, roles in own and others' customer relationships.
- **Relationship data:** information about spouse, cohabitant, children and marital status.
- **Demographic data:** income, education level and family structure.
- **Financial data:** information related to type of product and service agreement, employment situation (salary, FTE percentage), transaction data, credit history, account number and insurance history.
- **Images, video or audio files.**
- **Data relating to the status of a "politically exposed person**" such as a member of a national parliament, member of government, holder of a senior position in a state-owned company or the like.
- **Digital behavioural data**: type and technical number of digital device (e.g. PC or mobile phone), clicks, login and how the digital device arrived at our site, browser type and operating system.
- **Other:** In addition to the categories above, we also process other types of personal data when necessary for a specific type of processing. We will inform you about this when we collect the data.

We collect the personal data directly from you

Most of the personal data that we collect, and process will come directly from you, for instance when we process an application for a loan and other products and services we offer.

If you are affiliated with a company or other business that is a customer of DNB, we will collect and use your personal data if you are the owner, signatory or user of the company's account.

Other examples where we collect personal data directly from you are:

- When you become a customer, and we need to ask for your personal data in order to provide you with the product or service we offer.
- When you provide feedback through our digital channels and via chat.
- When you have been in contact with us, and we ask about your experience in order to provide better customer service.

We collect your personal data from third parties

In order to provide you with services, comply with statutory requirements and quality assure the information you have provided to us, we collect personal data about you from third parties such as:

- publicly available sources and other external sources managed by public authorities (e.g. the National Population Register, Suomen Asiakastieto Oy,) when we apply customer due diligence measures pursuant to anti-money laundering rules and legislation
- databases to adverse media search
- companies within the DNB Group
- other financial institutions
- employers
- company registers
- law enforcement authorities
- sanctions lists
- social media
- agents and distributors

Why do we process personal data in DNB Bank ASA, Finland Branch?

Provide products and services

ACCOUNT AND PAYMENT SERVICES

How do we process personal data?

We process your personal data when you open an account and enter into a payment services agreement with us. We do this in order to process invoices, carry out payment transactions on your accounts and provide other services that you have linked to your account by agreement with us or third parties.

We collect the information directly from you, from our internal systems, from credit information agencies and other public registers. We need to verify your identity in accordance with anti-money laundering rules and legislation.

Why do we process your personal data and what is the legal basis?

The purpose of processing personal data is to offer, monitor and provide account and payment services. The legal basis for the processing is to be able to fulfil the agreement we have with you.

If you are a representative/ contact person of DNB's corporate customer, we have a legitimate interest in processing your personal data. Our legitimate interest is to offer, monitor and provide account and payment services to the company for which you are a contact person.

To comply with our legal obligations, we are responsible for complying with statutory reporting obligations and preventing money laundering and terrorist financing as part of the overall customer relationship.

What types of personal data do we process?

- identification data
- contact details
- relationship data
- for a corporate account, we process personal data about the person who creates the account or represents the company.

How long do we retain your personal data?

We retain your personal data for 13 years after the end of the contractual relationship, in accordance with the statutory period of limitation.

Who do we share your personal data with?

We use data processors in connection with payment and cloud services. In accordance with our reporting obligations, we may disclose personal data to public authorities and registers.

What are your rights?

When we collect and process information about you, you have several rights under data protection rules and legislation. This includes the right of access, the right to data portability, the right to rectification of any errors and the right of erasure, which means that we must, on our own initiative, delete information that is no longer necessary for the purpose of the processing.

We will always consider any objections you may have to the processing of your personal data, and we will follow up when you opt out of direct marketing. Read about how you can exercise your data protection rights in our privacy notice under '**Your rights'.**

Who is responsible?

DNB Bank ASA is responsible for the processing of your personal data.

DNB Bank Finland Branch ("DNB") is a branch of DNB Bank ASA. DNB Bank ASA is therefore the controller and is responsible for the processing of your personal data. If you have any questions or inquires relating to the processing of your personal data, you may contact the branch at finlanddataprotection@dnb.no.

CUSTOMER EVENTS

How do we process personal data?

We process personal data when we invite you as a customer to a physical or digital event. We do this so that you can enjoy a benefit we offer, such as meeting like-minded people and attending inspiring lectures on how to improve your corporate finances.

Why do we process your personal data and what is the legal basis?

The purpose of processing your personal data is to send invitations to, and carry out, customer events and campaigns.

The legal basis for the processing of personal data may be that we have a legitimate interest, for example in conjunction with an event related to your existing products or services from us, or that we obtain your consent.

If we serve food, we may process information regarding any potential allergies or other food preferences. If you accept the invitation to the event, we will ask for your consent to contact you about the event and the event program, and to request an evaluation afterwards.

What types of personal data do we process?

- contact details
- relationship data
- special categories of personal data (allergies)

How long do we retain your personal data?

We store personal data for 12 months from the date of registration so that we can follow up any claims for reimbursement or other communication with participants.

Who do we share your personal data with?

We may share your personal data with event agencies that process personal data for registration and administration of participation and payment, as well as the implementation and evaluation of events.

What are your rights?

When we collect and process information about you, you have several rights under data protection rules and legislation. This includes the right of access, the right to data portability, the right to rectification of any errors and the right of erasure, which means that we must, on our own initiative, delete information that is no longer necessary for the purpose of the processing.

We will always consider any objections you may have to the processing of your personal data, and we will follow up when you opt out of direct marketing. Read about how you can exercise your data protection rights in our privacy notice under '**Your rights'.**

Who is responsible?

DNB Bank ASA is responsible for the processing of your personal data.

Developing and optimizing our products and services

BUSINESS DEVELOPMENT AND THE IMPROVEMENT OF PRODUCTS AND SERVICES

How do we process personal data?

We reuse your personal data to analyze how our customers use our services. We use these analyses to improve and develop products and services, as well as to identify potential demand for new products and services.

The development and validation of data models is based on pseudonymized data in predefined data sets to conduct strategic, insight-based business operations. Model development is a constant process and is intended to ensure good business development decisions.

Why do we process your personal data and what is the legal basis?

The purpose of processing personal data is to improve and develop our products services. We have a legitimate interest for this processing of your personal data. Our legitimate interest is to develop, build, improve and build business models, systems, products and services to produce and deliver reports for our benefit, and to provide a high standard of service.

What type of personal data do we process?

- identification data
- contact details
- business relationship
- relationship data
- demographic data
- digital behavior data

How long do we retain your personal data?

We retain personal data used for the development and testing of our IT solutions for up to one year.

What are your rights?

When we collect and process information about you, you have several rights under data protection rules and legislation. This includes the right of access, the right to data portability, the

right to rectification of any errors and the right of erasure, which means that we must, on our own initiative, delete information that is no longer necessary for the purpose of the processing.

We will always consider any objections you may have to the processing of your personal data, and we will follow up when you opt out of direct marketing. Read about how you can exercise your data protection rights in our privacy notice under '**Your rights'.**

Who do we share your personal data with?

We may share your personal data with third parties, such as providers of data processing services, in order to carry out development.

Who is responsible?

DNB Bank ASA is normally responsible for the processing of your personal data.

DNB Bank Finland Branch ("DNB") is a branch of DNB Bank ASA. DNB Bank ASA is therefore the controller and is responsible for the processing of your personal data. If you have any questions or inquires relating to the processing of your personal data, you may contact the branch at finlanddataprotection@dnb.no.

Anti-money laundering and counter-terrorist financing

ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING

How do we process personal data?

We are committed to knowing and making risk classification of our customers. In order for you to become a customer, we must therefore process a series of personal data about you. We ask multiple questions, and we require documentation, such as identification papers, contact details, citizenship and country of birth. You must state the purpose of your customer relationship with us, and you must also answer questions about relationship with politically exposed persons (PEP).

To ensure correct due diligence, we will consider whether there is a need for enhanced customer due diligence. Some customers will therefore be marked with a need for enhanced customer due diligence, based on certain predefined criteria.

We are also required to have electronic surveillance systems in place for detecting circumstances that may indicate money laundering and terrorist financing, including risk classifying you as a customer. Each individual DNB company processes personal data about its own customers if there are alerts from the electronic surveillance system, including sanction alerts and PEP alerts.

As part of the customer relationship, we are required to screen customers and transactions against sanction lists from the UN, EU and OFAC. We also screen customers to determine whether the customer or other parties in the customer relationship are PEPs or close associates of a PEP. We must also identify whether the customer, representatives and account signatories are beneficial owners pursuant to the Finnish Anti-Money Laundering Act.

If we detect anything suspicious during the course of the customer relationship, we have a duty to conduct examinations, which we follow up and possibly report to Finnish FIU (the Finnish National Authority for Investigation and Prosecution of Economic and Environmental Crime).

Why do we process your personal data and what is the legal basis?

The purpose of the processing of personal data is to comply with the rules and legislation for anti-money laundering and terrorist financing when establishing customer relationships as well as during the customer relationship.

Our legal basis is the Finnish Anti-Money Laundering Act and appurtenant regulations, as well as the active UN & EU sanctions regimes.

What type of personal data do we process?

- identification data
- contact details
- relationship data
- financial data

How long do we retain your personal data?

We are obliged to retain information that is processed in accordance with the Finnish Anti-Money Laundering Act, as a general rule for five years after the customer relationship has ended, or an individual transaction has been completed.

The retention period is ten years if, at the end of the customer relationship, the customer relationship was subject to enhanced customer due diligence measures or a transaction was subject to enhanced customer due diligence measures.

What are your rights?

When we collect and process information about you, you have several rights under data protection rules and legislation. This includes the right of access, the right to data portability, the right to rectification of any errors and the right of erasure, which means that we must, on our own initiative, delete information that is no longer necessary for the purpose of the processing.

We will always consider any objections you may have to the processing of your personal data, and we will follow up when you opt out of direct marketing. Read about how you can exercise your data protection rights in our privacy notice under ‘**Your rights’.**

Who do we share your personal data with?

We are obliged to disclose personal data to public authorities. We may also share your personal data with other obliged entities in the Group when we have a right or obligation to do so.

Who is responsible?

DNB Bank ASA and the individual Group companies where you have a customer relationship are responsible for the processing of your personal data.

DNB Bank Finland Branch ("DNB") is a branch of DNB Bank ASA. DNB Bank ASA is therefore the controller and is responsible for the processing of your personal data. If you have any questions or inquires relating to the processing of your personal data, you may contact the branch at finlanddataprotection@dnb.no.

PREVENTION OF FINANCIAL CRIME

How do we process personal data?

We are working systematically to prevent our products and services from being used for criminal activities. In order for us to be able to prevent, detect, investigate, and deal with fraud and other criminal acts against the bank and you as a customer, we need to process personal data.

It is often difficult to detect fraud and other criminal acts carried out against us and our customers. It often takes a long time for such actions to be detected, or for suspicions to arise at all. Our banking license clearly stipulates that banks have the right to process personal data for this purpose. We are also required by law to have monitoring solutions for certain forms of fraud. For this reason, we have access to personal data that has already been collected from you as a customer to the extent necessary to detect, report or prevent financial crime. We emphasise that access to personal data reused in such cases is strictly regulated.

Why do we process your personal data and what is the legal basis?

The purpose of the processing of personal data is to prevent, detect, investigate, and deal with financial fraud and other criminal acts against the bank and you as a customer. The Payment Services Directive requires us to have monitoring solutions to detect fraud.

The legal basis is to fulfil a statutory duty. In addition, we have legitimate interest in preventing, detecting, investigating, and dealing with other criminal offences against the bank or any other company in the Group.

The processing also has the purpose of protecting customers against loss and we have a legitimate interest in protecting our customers and their financial interests

What type of personal data do we process?

- identification data
- contact details

- relationship data

How long do we retain your personal data?

We retain your personal data for at least five years due to the authorities' case processing time from the receipt of reports until a legally enforceable decision has been made.

What are your rights?

When we collect and process information about you, you have several rights under data protection rules and legislation. This includes the right of access, the right to data portability, the right to rectification of any errors and the right of erasure, which means that we must, on our own initiative, delete information that is no longer necessary for the purpose of the processing.

We will always consider any objections you may have to the processing of your personal data, and we will follow up when you opt out of direct marketing. Read about how you can exercise your data protection rights in our privacy notice under '**Your rights'.**

Who do we share your personal data with?

We are obliged to disclose personal data to the police upon request.

Who is responsible?

DNB Bank ASA is responsible for the processing of your personal data.

DNB Bank Finland Branch ("DNB") is a branch of DNB Bank ASA. DNB Bank ASA is therefore the controller and is responsible for the processing of your personal data. If you have any questions or inquires relating to the processing of your personal data, you may contact the branch at finlanddataprotection@dnb.no

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Control, reporting and analysis

CONTROL, REPORTING AND ANALYSIS

How do we process personal data?

We reuse personal data about you to ensure proper management of our business operations and to keep track of all the data we have. Information about you and your customer relationship is included in the data we process when we control, analyze and report figures for the Group. Information that is reused includes your customer number and associated contractual relationships. To ensure that we have complete and correct data registered in our systems, we will process personal data when we control, and quality assure data.

Personal data is anonymized and summarized for analysis purposes, for example to assess the profitability of the products we offer, or other analyses we need to ensure proper management of

our business operations. In order to full fill our legal requirements towards authorities we must include, among other things, all payments made through our systems, including all customer transactions.

Every year, we report the status of our customers' accounts to Finnish and international authorities for tax purposes. We are required to report information about name, business id address and other data requested by the authorities.

Why do we process your personal data and what is the legal basis?

The purpose of the processing of personal data is to ensure control of our business operations and to carry out necessary analyses and mandatory financial reporting. We have a legal obligation to process your personal data for tax purposes. We have a legitimate interest in controlling and quality assuring the personal data that we have stored in our systems.

What type of personal data do we process?

- identification data
- tax residence
- financial data

How long do we retain your personal data?

After the analyses are complete, they will no longer contain identifiable personal information.

What are your rights?

When we collect and process information about you, you have several rights under data protection rules and legislation. This includes the right of access, the right to data portability, the right to rectification of any errors and the right of erasure, which means that we must, on our own initiative, delete information that is no longer necessary for the purpose of the processing.

We will always consider any objections you may have to the processing of your personal data, and we will follow up when you opt out of direct marketing. Read about how you can exercise your data protection rights in our privacy notice under '**Your rights'.**

Who do we share your personal data with?

We are obliged to disclose personal data to Finnish and international tax authorities, such as Finnish Financial Supervisory Authority.

Who is responsible?

DNB Bank ASA is responsible for the processing of your personal data.

DNB Bank Finland Branch ("DNB") is a branch of DNB Bank ASA. DNB Bank ASA is therefore the controller and is responsible for the processing of your personal data. If you have

any questions or inquires relating to the processing of your personal data, you may contact the branch at finlanddataprotection@dnb.no.

TAX REPORTING

How do we process personal data?

Every year, we report the status of all clients' fund accounts in DNB to Finnish and international authorities for tax purposes. We are required to report details of business id, name, address and fund holdings. As a result of international agreements on the automatic exchange of tax information, we must also collect and report information about which countries you as a customer have tax affiliation to. We disclose the information to the Finnish tax authorities, who pass this on to the tax authorities in the respective countries where the account holder or beneficial owner is resident for tax purposes.

Why do we process your personal data and what is the legal basis?

The purpose of processing personal data is to combat tax avoidance or evasion of international tax crime.

We are required by law pursuant to the Securities Regulations to report the status of all clients' fund accounts or fund holdings to Finnish tax authorities. We are required by law under the FATCA and CRS regulations to identify and annually report the balance/value of our customers who have tax residency in a country other than the one in which the account is held.

What type of personal data do we process?

- identification data
- contact details
- financial data

How long do we retain your personal data?

We store personal data for 12 years. For international tax reporting, we store information for 5 years after the end of the year in which the customer relationship was reported to the tax authorities or new documentation has been obtained.

What are your rights?

When we collect and process information about you, you have several rights under data protection rules and legislation. This includes the right of access, the right to data portability, the right to rectification of any errors and the right of erasure, which means that we must, on our own initiative, delete information that is no longer necessary for the purpose of the processing.

We will always consider any objections you may have to the processing of your personal data, and we will follow up when you opt out of direct marketing. Read about how you can exercise your data protection rights in our privacy notice under '**Your rights'.**

Who do we share your personal data with?

We are obliged to disclose personal data to Finnish and international tax authorities.

Who is responsible?

DNB Bank ASA is responsible for the processing of your personal data.

DNB Bank Finland Branch ("DNB") is a branch of DNB Bank ASA. DNB Bank ASA is therefore the controller and is responsible for the processing of your personal data. If you have any questions or inquires relating to the processing of your personal data you may contact the branch at finlanddataprotection@dnb.no.

AUDIT

How do we process personal data?

In DNB, Internal Audit is one of our central control bodies that will check and ensure that we are organized and operate in a prudent manner. Furthermore, we will ensure that we have satisfactory internal management and control systems that cover the overall business.

We do not collect personal data directly from you for this purpose. In order to carry out our audit work, a limited area in DNB has unrestricted access to the Group's documents, electronic data, physical assets/premises and personnel. Access to electronic data entails access to the Group's data warehouses, data sources and databases, including regular data collection in connection with topic-based activities and continuous audit monitoring. In this way, we will be able to reuse personal data collected by DNB business areas with direct customer contact.

Employees who work with internal auditing have a duty of confidentiality and sign a separate non-disclosure agreement upon appointment. We have strict access control in our case management systems and physical premises.

Why do we process your personal data and what is the legal basis?

The purpose of processing personal data is to be able to comply with legal requirements to be organized with proper management and control, including independent control functions responsible for internal auditing, risk management and compliance with requirements laid down in laws and regulations.

We have a statutory obligation to process your personal data for this purpose in accordance with the requirements of the Financial Institutions Act and the CRR/CRD IV regulations.

What type of personal data do we process?

- identification data
- contact details
- relationship data
- financial data
- digital behavioural data
- demographic data

How long do we retain your personal data?

Any personal data processed as part of an audit will be stored for up to 10 years for any external quality control carried out every five years.

What are your rights?

When we collect and process information about you, you have several rights under data protection rules and legislation. This includes the right of access, the right to data portability, the right to rectification of any errors and the right of erasure, which means that we must, on our own initiative, delete information that is no longer necessary for the purpose of the processing.

We will always consider any objections you may have to the processing of your personal data, and we will follow up when you opt out of direct marketing. Read about how you can exercise your data protection rights in our privacy notice under '**Your rights'.**

Who do we share your personal data with?

We may disclose personal data to supervisory authorities in situations where DNB is required to do so.

Who is responsible?

DNB Bank ASA is responsible for the processing of your personal data.

DNB Bank Finland Branch ("DNB") is a branch of DNB Bank ASA. DNB Bank ASA is therefore the controller and is responsible for the processing of your personal data. If you have any questions or inquires relating to the processing of your personal data, you may contact the branch at finlanddataprotection@dnb.no.

Defending DNB's legal claims

How do we process personal data?

We process personal data to assert our contractual rights and to protect our reputation and

financial interests. We reuse information from our internal systems so that we can handle claims, complaints, disputes and legal processes for debt recovery or other disputes.

The type of personal data we process depends on DNB Legal's assessment of what is necessary to shed light on the individual case. Throughout your customer relationship and after your agreement expires, we must retain and have access to reuse your personal data in the event of debt recovery, claims, a complaint or legal dispute. If we did not retain case history, it would not be possible for us to handle debt recovery, claims, complaints, disputes and other legal processes.

DNB has internal lawyers and a debt recovery department who provide legal services to the Group. DNB Legal and the debt recovery department process personal data about our clients only if it is relevant to the case they are considering.

Why do we process your personal data and what is the legal basis?

The purpose of the processing of personal data is to administrate and fulfill the agreement with our customers, assert our contractual rights and to protect our reputation and financial interests. We have a legitimate interest for this processing of your personal data. Our legitimate interest is to safeguard the bank's financial rights pursuant to agreements with our customers.

The processing is also based on our legal obligation to establish, exercise or defend legal claims. We also have a legitimate interest in being able to process personal data in order for our lawyers and the debt recovery to provide legal advice.

What type of personal data do we process?

The personal data we process for this purpose will depend on the case.

How long do we retain your personal data?

The need to retain personal data is associated with the protection of our legal position related to the risk associated with the product, as well as the absolute limitation period for claims, cf. the Finnish Act relating to the Limitation Period for Claims.

The personal data is saved during the entire contractual relationship and up to 12 months after the agreement is terminated. The personal data may be saved longer if it is needed to meet legal requirements. For example, information about granted credit is saved five years after the agreement has been terminated and the agreement itself is saved for seven years after termination of the agreement. In addition, personal data may be stored longer than 12 months after the agreement has been terminated in order to establish, defend and assert a legal claim, e.g. in the event of a dispute about payment.

What are your rights?

When we collect and process information about you, you have several rights under data protection rules and legislation. This includes the right of access, the right to data portability, the right to rectification of any errors and the right of erasure, which means that we must, on our own initiative, delete information that is no longer necessary for the purpose of the processing.

We will always consider any objections you may have to the processing of your personal data, and we will follow up when you opt out of direct marketing. Read about how you can exercise your data protection rights in our privacy notice under '**Your rights'.**

Who do we share your personal data with?

We may share personal data with courts, external lawyers/parties and public authorities.

Who is responsible?

DNB Bank ASA is responsible for the processing of your personal data.

DNB Bank Finland Branch ("DNB") is a branch of DNB Bank ASA. DNB Bank ASA is therefore the controller and is responsible for the processing of your personal data. If you have any questions or inquires relating to the processing of your personal data, you may contact the branch at finlanddataprotection@dnb.no.

Who do we share your personal data with?

Third parties

DNB may, within the framework of current bank secrecy rules, disclose your personal data to third parties, such as to other companies in DNB Group, as well as to IT suppliers and companies we collaborate with to provide our products and services. In some cases, we may also need to provide information at the request of authorities such as the Finnish Financial Supervisory Authority (Finanssivalvonta), the Finnish Tax Agency, Finnish Financial Intelligence Unit (FIU), or to other parties in the context of judicial or corporate acquisition processes or the like. We will not sell your personal data to third parties.

Data processors

We use data processors in several situations. A data processor is a third party who processes personal data on our behalf. The data processor does not have its own purposes for processing of personal data. We have data processors in Finland and in other countries both inside and outside the EEA, such as:

- IT service providers that maintain DNB Finland Branch information systems
- Debt collection agencies help with the collection of overdue receivables
- Service providers investigating the location and holder of the vehicle to be taken back
- Companies in the DNB Group

Sharing between companies in the DNB Group

DNB is a group consisting of different companies, and thus there are multiple companies that are data controllers. There may be one or more companies within the Group that are the data controller for your personal data, depending on your relationship with one or more companies.

Sometimes we need to share personal data about you within the Group. For instance, this may be to fulfil customer agreements, to meet obligations under company law because requirements to our information security make it necessary, or due to anti-money laundering obligations. It may also be because we have a legitimate interest for various purposes mentioned in the privacy notice.

There are strict rules on confidentiality for financial services and investment firms, including for companies in the DNB Group. Before sharing personal data, we will always ensure that we also comply with our duty of confidentiality.

DNB has a shared customer register. The purpose of the Group customer register is to manage your customer relationship and coordinate offers of services and advice from the various companies in the DNB Group. The Group customer register contains information about you, such as name, date of birth, address and other contact details, which Group company you are a customer of, and the services and products for which you have entered into an agreement.

Transfer of personal data to countries outside the EA/EEA

DNB Bank ASA Finland Branch always strives to process your personal data within the EU/EEA. In certain cases, we may disclose your personal data to countries outside the EU/EEA. If personal data is transferred to such a country, we will ensure that the personal data is still secure and that the transfer takes place in accordance with the law.

When transferring personal data to a country outside the EU/EEA that does not provide an adequate level of data protection, we apply the European Commission's standard contractual clauses for the transfer of personal data to countries outside the EU/EEA. In order for us to transfer your personal data outside the EEA, the GDPR requires us to have a valid legal basis for the transfer.

One of the following conditions must also be met:

- When the European Commission has determined that there is an adequate level of protection in the country in question.
- When other suitable security measures have been implemented and/or the data processor has provided the necessary guarantees that the personal data will be processed in a secure manner. This may be through the use of standard contracts (EU Standard Contractual Clauses) approved by the European Commission, or that the data processor has valid Binding Corporate Rules (BCRs).
- When there are exceptions in special cases, for example to fulfil an agreement with you or when you give your consent to the specific transfer.