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# Privacy notice

## Information on how we process personal data

### Protecting your personal data

To ensure we earn your trust, we, (DNB Luxembourg S.A.) 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.

### 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.

The controller for the processing of your personal data is DNB Luxembourg S.A (B22374), a subsidiary of DNB Bank ASA. The office is located in 31 Rue Goethe, L-1637 Luxembourg, Grand Duchy of Luxembourg. We are incorporated under Luxembourg laws and regulated by Commission de Supervision de Secteur Financier (CSSF) as a bank.

We have appointed a Data Protection Officer (DPO). If you have any questions regarding the processing of your personal data, you may contact our DPO at [Luxembourgdataprotection@dnb.no](mailto:Luxembourgdataprotection@dnb.no). You may also always contact your account manager with the Bank.

### Data Protection in the DNB Group

DNB Luxembourg S.A is part of an international financial group consisting of the parent company DNB Bank ASA and a number of branches and subsidiaries. Together, these entities constitute 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 below:

[Personvern | Om oss fra A til Å – DNB](#)

### 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 will need some more time to respond to you. If so, we will provide you with an explanation of why it is taking us longer time 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:

### **DNB Luxembourg S.A.**

attention: Data Protection Officer

13, rue Goethe

L-1637 Luxembourg

Luxembourg

or by email at [luxembourgdataprotection@dnb.no](mailto:luxembourgdataprotection@dnb.no)

If you are a former employee or have applied for a position with us and wish to exercise your rights, please contact our HR support team at [HRGrouplux@dnb.no](mailto:HRGrouplux@dnb.no)

Kindly remember to provide contact details where we may contact you.

## Complaints

If you are unsatisfied with our response to your request or have any other concerns regarding the processing of your personal data, you may contact the Data Protection Officer in writing at the above address.

If you are unsatisfied after having talked to us, you can submit a complaint in writing to the Bank by email to [Luxembourgcomplaints@dnb.no](mailto:Luxembourgcomplaints@dnb.no) or by post to the above listed address. Further information and instructions may be found in the [Bank's Complaint Policy](#) published at the Bank's website. When you submit a complaint, we will acknowledge receipt within 10 days and process your complaint as soon as possible, normally within 30 days. You will be notified when your case has been processed, or if we need you to provide more information.

You also have the right to raise any questions or file a complaint about the processing of your personal data directly to the Luxembourg data protection supervisory authority CNPD:

### **Commission Nationale Pour La Protection des données/National Commission for Data Protection**

15, Boulevard du Jazz

L-4370 Belvaux

Luxembourg

Tél. : (+352) 26 10 60 -1

Website: [www.cnpd.lu](http://www.cnpd.lu)

## Your rights

### Right of access

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

Remember you can find various account information in your online bank, such as confirmation notes and account statements.

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. Internal information that constitutes part of the preparatory work for ensuring correct administration, or information linked to business secrets are other examples of when access to information is restricted. 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 above](#).

## Right to 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 of your personal data, you may contact your account manager with the Bank in writing. You may also contact us in writing at the [address provided above](#).

## 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, 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 on a consent basis, we will always make sure to stop the processing of your personal data.

- If your personal data is processed for 'statistical purposes', you may have the right to object on grounds relating to your particular situation. We will process your objection as quickly as possible.

### **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 above](#).

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. If the marketing is based on your consent, you may withdraw your consent by informing your Account Manager and/or by sending a written notice to the Bank at the above mentioned address/email.

### **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 data portability**

To request a portable copy of the personal data in scope of data portability, please contact us in writing at [the address provided above](#).

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, you can do so by sending us a request in writing at the [address provided above](#).

Do not use this channel if you wish to terminate a product or agreement. Instead, please contact your Account manager.

### **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 we can check whether the personal data is correct and perform corrections if necessary.
- If the processing is unlawful, but you do not request erasure and instead request that we restrict the use of your personal data, we will continue to retain your personal data.
- 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, you can do so by sending a request in writing at the [address provided above](#).

# 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, nationality, national identity number, birth date, birth place, photograph, customer number, copy of identification documents, social security number, proof of address, IP addresses, signatures and electronic signature, authentication data, power of attorneys; evidence of beneficial ownership and shareholding,
- **Know your customer data:** background and verification data relating to a customer and customer's activities and purpose of account; evidence data on source of wealth/source of funds; whether you qualify as Politically Exposed Person; designation in a financial sanction regime; adverse media; criminal records; decisions from Public Agencies;
- **Contact details:** name, telephone number, postal and email address, business and personal contact information;
- **Business relations:** profession, roles in own and other customers' relationship;
- **Relationship data:** information on civil or marital status, information about spouse, cohabitant and children;
- **Financial Data:** information and documents related to product and service agreement applied for or agreed with the Bank, account-, portfolio- and IBAN number; credit worthiness information and assessment, purpose of loan, information on financial situation and history and related documentation, income and expenses, employment situation (salary/pension/self-employment), assets (including fixed properties), debts, liabilities, credit history and rating, credit limit, data and documentation related to collateral/guarantees, transaction data investment data (e.g. current and past investments, investment profile, investment preferences, investment objectives, risk tolerance, data related to financial knowledge and experience in investment matters, sustainability preferences, investment horizon, wealth, invested amount, number and value of shares held, data received in relation to custody and execution of orders), credit card details, insurance policies, risk scoring,
- **Tax Information:** Tax residence, tax identification number (TIN), tax certificate, proof of tax residence, proof of TIN number, tax related information and documentation, withholding tax rates; tax declarations, Controlling Persons details and role in legal entity, self-certification forms for CRS/FATCA;
- **Communication Data:** including data obtained through our website and through cookies, when using the web banking application, e-mails, fax, interview, phone recording data, chats, images, video or audio files, registration and attendance of events or meetings;
- **Marketing Information:** Information whether you wish to receive direct marketing and invitation to events from us;
- **Recruitment and employment:** career and employment data, role, education and professional information, e.g. employment and job history, title level of education, professional qualification, work knowledge and experience, bank account, family member, criminal records;
- **Behavioural Data:** Digital Behavioural data, such as 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 behavioural data such as time, date of arrival and departure at the Bank's premises or travel arrangements.
- **Special categories of data:** e.g. health data. As a general rule special category of personal data shall however not be processed. Such special category personal data may be processed incidentally when such information is volunteered by you or when there is another legal reason for the processing;



- **Other:** Personal data processed in relation to requests or orders from duly authorized supervisory authorities, tax authorities, judicial authorities, and other competent authorities ("Authority"): We may disclose and transfer personal data to an Authority when obliged or authorised to do so by Applicable Laws. In addition to the categories above, we also process other types of personal data when necessary for a specific type of processing and/or required by applicable laws and regulations. We will inform you about this when we collect the data.

The processing involves individual customers as well as third party individuals connected to any individual or corporate customer (e.g. Customer's family member(s), proxy holder(s), beneficiary(ies), policy holder(s) or beneficiaries of insurance wrappers, guardian, guarantor(s), representative(s), director(s), trustee(s), settlor(s), shareholder(s), employee(s), beneficial owner(s), controlling person(s), signatories and/or contact person(s) and such individuals connected to layered company structures, as applicable).

### We collect 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 the Bank, or if you are another connected person to a customer (see who may be a connected person above under Protecting your personal data), we will collect and use your personal data where relevant, e.g. if you are the owner, signatory, controlling person 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 meet us or communicate with us via email, phone, online banking or post and/or provide feedback through our other digital channels and via chat;
- When you log in to your e-banking and visit our website;
- When we provide investment services and are required by law to make and retain audio recordings of phone calls.

### 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 or third parties (depending on the product or service you receive and the country of residence this may include e.g. the national population register, company registers, tax authorities, beneficial ownership register) when we apply customer due diligence measures pursuant to anti-money laundering rules and other mandatory legislation;
- debt registers and the credit reference agencies when you apply for a loan;
- companies within the DNB Group;
- other financial institutions;
- law enforcement authorities;
- sanctions and PEP lists;
- If your account is inactive and we need to research your whereabouts;
- websites and social media.

## Why do we process personal data in DNB Luxembourg S.A?

### Provide products and services

#### ACCOUNT AND PAYMENT SERVICES

##### How do we process personal data?

We process your personal data to enter into an account and payment service agreement with you, to create an account and provide you with account and payment services on an ongoing basis. We do this in order to process invoices, carry out and receive payment transactions on your account and to provide other services that you have linked to your account by agreement with us or with a third party (for example credit card), as well as to handle an inactive or blocked account (in accordance with applicable law) and terminate/close your account.

We collect the information directly from you and other public or commercial registers.

As part of the onboarding process and ongoing management of your account and payment service agreement we also need to carry out a number of legal and compliance checks.

##### 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 and to manage the customer relation with you. The legal basis for the processing is to be able to fulfil the agreement we have with you.

If you are the contact person of a corporate customer, we process your personal data to fulfil the agreement we have with the corporation, in order to offer, monitor and provide account and payment services.

The purpose and legal basis is also to comply with our legal obligations, statutory reporting obligations and preventing financial crime.

##### How long do we retain your personal data?

We retain your personal data for no longer than is necessary for the purposes for which the Personal Data are processed by us and in accordance with our legal obligation. In general, we store the personal data 10 years after the end of the business relationship with customers.

Exceptionally, we may store data beyond the periods mentioned above, as may be imposed or permitted by law.

##### 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 Luxembourg S.A. is responsible for the processing of your personal data.

### What type of personal data do we process?

- identification data
- contact details
- business relations
- relationship data
- financial data
- Know your customer data
- Tax information
- for a corporate account, we process personal data about the person who creates the account or represents the company and other connected persons.

### Who do we share your personal data with?

Correspondent and custodian banks, specialized payment agents (for SEPA payments) and specialized payment institutions such as SWIFT, payment recipients and data processors.

In accordance with our reporting and disclosure obligations and duties under Anti money laundering and counter terrorist financing, we may disclose personal data to public authorities, financial institutions, custodian and correspondent banks.

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## CREDIT CARD

### How do we process personal data?

We do not issue payment or credit cards. Nevertheless, a customer wishing to obtain a credit card connected to its account may instruct us to refer the customer to a third party issuer.

We process personal data when we refer your application for credit card to such third party issuer, suggest a credit limit for you to the third party issuer and in connection with your ongoing use of the card and termination of the same. This include processing your personal data as part of the customer relationship, performing credit worthiness assessment, managing payments, credit card statements, customer requests, blocking recommendations, blocking notices and termination notices, forwarding you information form the third party issuer and performing compliance checks to detect money laundering and terrorist financing. We will also process personal data in connection with the entering into and management of a pledge agreement in favour of us as security for your obligations in relation to the card use and third party issuer. If you default on your obligations towards the third party issuer, we will process personal data as part of the enforcement of your pledge.

We obtain the information from you and from our internal systems, such as credit referral application and account information and from the third party issuer.

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

The purpose of processing personal data is to offer and provide you the possibility to have a credit card connected to your account. The legal basis for the processing is to be able to fulfil the agreement we have with you.

If you default on your obligations towards the third party issuer, we have a contractual right to enforce your pledge.

The purpose and legal basis is also to comply with our legal obligations. We are responsible for complying with statutory reporting obligations and preventing financial crime.

### How long do we retain your personal data?

We retain your personal data for no longer than is necessary for the purposes for which the Personal Data are processed by the Bank and in accordance with our legal obligation. In general, the Bank stores the personal data 10 years after the end of the business relationship with customers.

Exceptionally, we may store data beyond the periods mentioned above, as may be imposed or permitted by law.

### 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 Luxembourg S.A. is responsible for the processing of your personal data.

The relevant third-party issuer of the credit card is as controller also responsible for the processing of your personal data in relation to the use of your credit card.

### What type of personal data do we process?

- identification data
- contact details
- know your customer data
- relationship data
- financial data

### Who do we share your personal data with?

We will exchange certain information with the third party issuer, including identification details, contact details, know your customer details, card holder details and suspicions in relation to anti money laundering and crime prevention.

In accordance with our reporting and compliance obligations, we may also disclose personal data to public authorities.

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## SECURED LOANS

### How do we process personal data?

We process personal data when you apply for and enter into an agreement with us on various products related to secured loans from us. The products we offer are secured loans with collateral in real estate, personal guarantees, securities and cash and other guarantees.

We process personal data when we assess and decide upon your credit application (including the need for guarantees and secured collateral), perform a credit worthiness assessment, verify your credit information and credit scoring, decide on your credit limit, request valuation of your guarantee, and take steps to establish collateral. We will use the data to assess whether you are able to afford to make repayments, to verify that what you have told is true, correct and up to date, and to help detect and prevent financial crime.

When you have entered into an agreement, we process your personal data to administer your loan, manage and monitor the customer relationship and your collateral, including your ongoing repayment, to prevent you from misusing the product, and to prevent financial crime. We will also process data in case of default or payment failures, to trace and recover debts and enforce our collateral/guarantees. We will also process your data to carry out legal and compliance checks and regulatory reporting.

We collect the information directly from you, our internal systems, the DNB Group, public registers, tax authorities, valuation firms, debt registers, debt collection agencies, credit information agencies, external lawyers and notaries, bailiff.

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

The purpose of processing personal data is to assess your credit application, including the need for guarantees and secured collateral, to provide you with information and to generally offer, monitor and provide you with products. The legal basis for the processing is to be able to fulfil the agreement we have with you.

The purpose is also to perform prudent operational management (including credit and risk management). We have a legitimate interest to prevent fraud or criminal activity and misuses of our products or services and to monitor the credit worthiness, real estate collateral and guarantees of private and corporate customers to minimize credit risks.

In the event of loan defaults, we have a legitimate interest in sending personal data to debt collection agencies and/or legal counsels and to facilitate debt recovery services. Our legitimate interest is to safeguard the bank's financial rights.

We also have to comply with legal obligations in regard to inter alia credit worthiness assessments, information duties and the prevention of financial crime and reporting.

### How long do we retain your personal data?

We retain your personal data for no longer than is necessary for the purposes for which the Personal Data are processed by the Bank and in accordance with our legal obligation. In general, the Bank store the personal data 10 years after the end of the business relationship with customers.

Exceptionally, we may store data beyond the periods mentioned above, as may be imposed or permitted by law.

### 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 Luxembourg S.A. is responsible for processing of your personal data.

### What type of personal data do we process?

- identification data
- contact details
- relationship data
- financial data
- know your customer data
- tax information
- business relationship

### Who do we share your personal data with?

We use service providers who assess the value of collateral provided and who provide credit report services.

In order to quality check, establish and monitor the guarantees and/or real estate collateral securing a loan with the Bank (and depending on the country of location of real estate collateral, type of credit and guarantee), we may disclose your personal data to external lawyers, notaries, land registers, valuation firms, DNB Group and/or other financial institutions.

We may disclose information to the DNB Group for credit approval, for details of any shared credit and prudent operational management (including credit and risk management) and in the event of default or litigation.

In the event of payment difficulties and enforcements proceedings, (and depending on the country of location of real estate collateral, type of credit and guarantee), and in order to safeguard our financial interests, your personal data may also be disclosed to debt collection agencies, debt registers, other financial institutions, external lawyers, notaries, bailiffs and courts.

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## INVESTMENT AND CUSTODY SERVICES

### How do we process personal data?

We process your personal data in order to offer and provide you with investment services. We collect the information directly from you and from our internal systems.

We use your personal data:

- to determine the correct client category and investor profile for you;
- when we advise you and/or you ask us to carry out an investment order;
- when carrying out suitability assessment, appropriateness and target market assessments, where required by applicable laws;
- when we enter into and manage an investment management agreement with you;
- to provide you with information and reports on your holdings, transactions, charges and costs, including inducements.
- to detect transactions which deviate from the normal patterns;
- to set up security measures in order to prevent misuse or fraud;
- to provide you with custody and settlement services of your assets and securities, including opening a segregated account with a sub custodian where required or deemed necessary, facilitate your shareholder/investor rights and keep your assets safe, answer your requests, manage the appropriate withholding tax rates on interest and dividend payments of your securities including reduced withholding rate, keep records of and confirming execution of your orders, manage your preferences or rights in relation to corporate actions, manage your opt in & opt out preferences for receiving general shareholder meeting notifications, manage your voting instructions, re-register beneficial ownership in order to manage a voting request, manage mandatory disclosure requests from issuers and intermediaries, and perform reconciliation activities (the latter to ensure that the assets held by counter parties correspond to those booked by us on your account).
- to distribute DNB Group products or third party products.
- to carry out legal and compliance checks and regulatory reporting.

You may find further information on our [website](#), see for example MIFID Customer Information Package, Conflict of Interest Policy, Inducement Policy, Shareholder rights directive, Remuneration Policy and other key documents.

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

The purpose of processing personal data is to offer and provide investment services to our customers. The legal basis for the processing is to be able to fulfil the agreement we have with you.

The purpose and legal basis is also to comply with our legal obligations. We are responsible for complying with statutory reporting obligations and preventing financial crime.

### How long do we retain your personal data?

We retain your personal data for no longer than is necessary for the purposes for which the Personal Data are processed by the Bank and in accordance with our legal obligation. In general, the Bank store the personal data 10 years after the end of the business relationship with customers.

Exceptionally, the Bank may store data beyond the periods mentioned above, as may be imposed or permitted by law.

### 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 Luxembourg S.A. is responsible for the processing of your personal data.

Additionally, third party custodians may also be responsible as controller of your personal data.

### What type of personal data do we process?

- identification data
- contact details
- business relations
- relationship data
- financial data
- Tax information

### Who do we share your personal data with?

Personal data about you may be disclosed to public authorities, in accordance with our reporting obligations, as well as others who have a legal basis for obtaining your personal data.

Where required or permissible by applicable laws or as agreed with you in accordance with our general terms and conditions to manage your investments, we may disclose personal data to issuers, intermediaries, public authorities, custodians and sub-custodians.



## AUDIO RECORDINGS AND ELECTRONIC COMMUNICATIONS

### How do we process personal data?

We will record all conversations that you have with our customer managers. In particular, the content of face-to-face conversations related to any order placing by a client will be recorded by using written minutes or notes.

We may listen to conversations and review other electronic communication/minutes for quality control purposes and as evidence of Bank's transactions and commercial communication with the customer.

All information on audio recordings is protected against unauthorized access by strict access control and internal procedures.

The telephone recording, electronic communications and notes from face-to-face meetings may also be used to detect any behaviour involving financial crime and/or market abuse in accordance with applicable laws.

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

We are legally required to make audio recordings of our telephone conversations with you and retain electronic communications and/or notes from face to face meetings when you as a customer receive or communicate in relation to investments services with us (and regardless if communications actually result in the conclusion of a transaction).

The purpose is also to assist with resolving ambiguities relating to what the parties may have communicated and agreed, the terms of an agreement and whether we have executed an order in conformity with instructions and agreed conditions. We have a legitimate interest in quality improvement and maintaining proof of our transactions and commercial communication with you.

The purpose and legal basis is also to comply with our legal obligation to prevent financial crime and/or market abuse.

### How long do we retain your personal data?

We retain phone recordings for at least five years to ensure correct documentation and compliance with legal obligations.

We retain your personal data for no longer than is necessary for the purposes for which the Personal Data are processed by the Bank and in accordance with our legal obligation. In general, the Bank store the personal data 10 years after the end of the business relationship with customers.

Exceptionally, the Bank may store data beyond the periods mentioned above, as may be imposed or permitted by law.

### 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 Luxembourg S.A. is responsible for the processing of your personal data.

### What type of personal data do we process?

- identification data
- contact details
- audio logs
- financial data
- communication data

### Who do we share your personal data with?

For mobile communication recording we use a software supplier for the processing of personal data. The data processor administers the software system and makes recording of calls available on our behalf.

Personal data may also be disclosed to service providers in connection with incident and maintenance management of the software system used for phone recording.

We may be required by law to disclose information to public authorities. In addition, personal data about you may be disclosed in connection with the processing of complaints.

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## **CUSTOMER RELATIONSHIP MANAGEMENT**

### How do we process your personal data?

We process your personal data on an ongoing basis to manage your customer relation.

This include communicating with you in relation to products and services you obtain or order from us or business partners, learning more about you and your preferences in relation to your products and services, handling customer service requests, responding to queries and complaints, managing inactive accounts, tracing your whereabouts if we are unable to contact you after a period of time, closing your portfolios or account, managing an account with a deceased account holder, etc. We will also process your data to carry out legal and compliance checks and comply with applicable laws. We communicate by digital means, by letter, via online banking, meeting and by phone.

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

The purpose of processing personal data is to manage your customer relation. The legal basis for the processing is to be able to fulfil the agreement we have with you or to take steps to enter into an agreement with you.

We also have a legitimate interest in maintaining and enhancing our relationship as well as to assess your eligibility for our products and services and market our products and services, and to monitor and avoid the misuse of our products and services.

We also process data to comply with legal obligations: to perform legal and regulatory compliance checks and due diligence measures, to manage complaints, and to meet our ongoing regulatory and compliance obligations.

### 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 Luxembourg S.A. is responsible for the processing of your personal data.

### What type of personal data do we process?

- identification data
- contact details
- know your customer data
- business relations
- relationship data
- audio logs
- financial data
- communication data

### How long do we retain your personal data?

We retain your personal data for no longer than is necessary for the purposes for which the Personal Data are processed by the Bank and in accordance with our legal obligation. In general, we store the personal data 10 years after the end of the business relationship with our customers.

Exceptionally, we may store data beyond the periods mentioned above, as may be imposed or permitted by law.

### Who do we share your personal data with?

We may share your personal data with service providers engaged by us.

Personal data about you may be disclosed to public authorities, in accordance with our reporting obligations, as well as others who have a legal basis for obtaining your personal data.

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## Marketing

### UNSOLICITED MARKETING CORRESPONDENCE AND CUSTOMER EVENTS

#### How do we process personal data?

Before contacting you directly with unsolicited marketing purposes via electronic means, letter or by phone, we obtain your consent. Your preferences in this regard can be changed at any time by contacting us.

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 the benefits we offer, such as meeting like-minded people and attending inspiring lectures on how to improve your personal or 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 is that we obtain your consent. You may withdraw a given consent at any time.

If we serve food, we may process information regarding any potential allergies or other food preferences.

#### How long do we retain your personal data?

We retain your personal data regarding your preferences for direct marketing throughout your business relationship with us.

#### 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 Luxembourg S.A. is responsible for the processing of your personal data.

### What type of personal data do we process?

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

### 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. Developing and optimizing our products and services

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## Development and optimization of our products and services

### DEVELOPING AND TESTING IT SOLUTIONS

#### How do we process personal data?

We reuse your personal data during the development and testing of our ICT solutions. We do this to ensure quality and stability. Development and testing are carried out prior to putting systems into production, and information is reused according to needs that are strictly defined by our internal systems.

We process personal data only if it would be impossible or disproportionately difficult to achieve the purpose of the testing by using anonymous data or synthetic data. Access to the test environment and personal data is strictly controlled by specialists.

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

The purpose of processing personal data is research, security, development and testing of the quality and stability of our IT solutions.

We have a legitimate interest for this processing of your personal data. Our legitimate interest is to ensure the quality and stability of our IT solutions.

At an overarching level, processing of personal data is necessary to meet statutory security requirements. This means that we are also obliged to carry out such testing to ensure proper deviation management, as well as to safeguard confidentiality, integrity and accessibility to ICT systems and data.

### How long do we retain your personal data?

We retain personal data used for the development and testing of our IT solutions as long as necessary for the purpose, generally until the completion of the project where ICT solutions are being tested or developed.

### 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 Luxembourg S.A. is responsible for the processing of your personal data.

### What type of personal data do we process?

- identification data
- contact details
- business relations
- relationship data
- financial data
- communication data
- digital behaviour data.

### Who do we share your personal data with?

We are outsourcing IT tasks relating to hosting, operations, development, maintenance, testing and support of IT infrastructure, IT security and IT Incident Management to the DNB Bank ASA as well as task related to IT support, maintenance and development to various other third-party service providers. These service providers, and their sub- service providers, may have access to your data in order to carry out testing and development actions.

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## **BUSINESS DEVELOPMENT AND IMPROVEMENT OF PRODUCTS AND SERVICES**

### How do we process personal data?

We reuse your personal data to analyse 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.

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 and 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 to customers.

### **How long do we retain your personal data?**

We retain personal data as long as necessary.

### **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 Luxembourg S.A. is normally responsible for the processing of your personal data.

### **What type of personal data do we process?**

- identification data
- contact details
- business relations
- relationship data
- financial data
- communication data
- digital behaviour data.

### **Who do we share your personal data with?**

We may share your personal data with the DNB Group and other third-party service providers in order to carry out development.

## Prevention of financial crime and market abuse

### How do we process personal data?

Before establishing a relation with a customer, we must apply all due diligence measures as appropriate and required by applicable laws, including but not limited to the Luxembourg Law of 12 November 2004 relating to the fight against money laundering and terrorist financing and related laws and regulations and any other laws and regulations applicable to the Bank.

This means we will at onboarding ask you multiple questions, request several documents and perform various legal checks and compliance controls in order to inter alia:

- identify and verify your identity and that of proxy holders, if any (in case the Customer is a legal entity, also that of any director(s), representative(s), beneficial owner(s) and controlling person(s), as applicable),
- get to know you as customer, assess and understand the purpose and intended nature of your business relationship with us, the origin of your wealth and revenues, your possible status as or relationships with politically exposed persons (PEP), your domicile, and tax information (in case the Customer is a legal entity, this may also apply to Controlling persons, where applicable),
- perform financial sanctions and negative media screening and fraud prevention measures,
- identify increased risk of market abuse.

We must also carry out due diligence measures, perform legal and compliance checks and meet all other ongoing regulatory, compliance and disclosure obligations continuously during the relationship with you.

We will apply a risk classification to your relationship whereby we assess the intensity, degree and frequency of the due diligence required, taking into consideration the type of customer you are (including also proxy holders and beneficial owners), the business relationship, the countries and geographic areas concerned, the products, services and transactions used, delivery channels, the risk of money laundering, corruption and/or terrorist financing. Enhanced due diligence measures will be applied to those business relationships deemed as high risk.

We are required to have electronic surveillance systems for detecting circumstances that may indicate money laundering and terrorist financing. The systems we have are used both in the risk classification of you as a customer and in the ongoing monitoring of transactions carried out as part of the customer relationship. The Bank processes personal data about its customers if there are alerts from the electronic surveillance system, including alerts related to the transaction screening services, sanction alerts and PEP alerts.

We are required to screen our customers and transactions against sanctions lists from for example the UN, the EU, and OFAC. We also screen customers and transactions to determine whether the customer or other parties in the customer relationship are PEPs or close associates of a PEP.

We cooperate with relevant authorities and inform them as well as DNB Group without delay and on our own initiative when we know, suspect or have reasonable grounds to suspect that market abuse, money laundering, an associated predicate offence or terrorism financing is being committed, has been committed or attempted or when we detect any transaction or relationship subject to restrictive measures in financial matters ('financial sanctions').

We also answer all information requests from relevant authorities and DNB Group when allowed by Law, in particular those which tend to determine whether we are or were in business relationships or whether we do or did carry out transactions in relation to specific persons.

We are further 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. We are 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.

We reply to authorized requests for information from relevant authorities, including but not limited to financial services regulators and other regulatory, judicial and governmental bodies.

We may obtain information from you, from public or third-party registers, websites/social media, screening services, national population register and DNB group entities.

### **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 applicable when establishing the customer relationship as well as continuously during the customer relationship. This includes but is not limited to laws and regulations relating to measures to combat money laundering and financing terrorism, sanctions and embargoes, know your customer obligations, prevention of market abuse, detection and prevention of fraudulent transactions, compliance with tax regulations and disclosure/reporting obligations vis-à-vis Luxembourg and foreign authorities.

The purpose is also to prevent, detect, investigate and deal with financial fraud and other criminal acts against the Bank and you as a customer. We have a legitimate interest and a statutory duty to protect our customers against loss and hence protect the vital interests of our customers. We also have a legitimate interest in preventing, detecting, investigating and dealing with other criminal offences against the bank or any other company in the DNB Group.

### **How long do we retain your personal data?**

We retain your personal data for no longer than is necessary for the purposes for which the Personal Data are processed by us and in accordance with our legal obligation. In general, we store the personal data 10 years after the end of the business relationship with customers.

Exceptionally, we may store data beyond the periods mentioned above, as may be imposed or permitted by law.

### **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 Luxembourg S.A. is responsible for the processing of your personal data.

### What type of personal data do we process?

- identification data
- contact details
- relationship data
- know your customer data
- financial data
- communication data
- Tax Information

### Who do we share your personal data with?

We are obliged to disclose personal data to local and foreign authorities, tax authorities, financial service regulators, judicial authorities and other public or regulatory authorities in case of statutory or regulatory obligation and/or in response to an authorized request.

We may also share your personal data with other financial institutions when we have a right or obligation to do so, with auditors and external service providers whose participation is necessary for the Bank to comply with its regulatory obligations.

We will exchange information about DNB Group-wide customers with other companies in the DNB Group under certain circumstances.

## Control, reporting and analysis

### How do we process personal data?

We are obliged to have in place robust internal governance arrangements enabling the Bank to retain control over all its activities. The Bank is required to have processes to identify, measure, report, manage, mitigate and control the risks to which the institutions are or may be exposed.

The Bank is obliged to carry out necessary analyses and mandatory financial, transactional and customer reporting.

We reuse personal data about you to

- ensure proper management of our business operations and to keep track of all the data we have;
- control, analyse and report personal data and figures;
- ensure we have complete and correct data registered in our systems and to control and quality assure data;
- perform reconciliations of customers' assets held with various counterparties of the Bank;
- comply with duties in relation to the deposit guarantee scheme;
- to comply with exchange of tax information duties. The Bank is required under various tax regulations, including but not limited to Foreign Account Tax Compliance Act (FATCA) and Common Reporting Standard (CRS) regulations, to collect and process certain tax information about its account holders. Where legally obliged, the Bank will disclose certain personal data and financial information to the Luxembourg Tax Authorities. The Luxembourg Tax Authorities may in turn exchange this information with other tax authorities as relevant.

- to comply with our reporting requirements in relation to (non-exhaustive list): financial reporting, tax reporting, reporting of certain personal data and financial data related to bank accounts identified by IBAN, customer transactions, reporting on top sources of liquidity, large exposures, top exposures in derivatives, credit exposures to counter parties, statistical reporting, the deposit guarantee scheme, disclosure requests from authorities located outside of Luxembourg upon valid requests pursuant to their local law, and/or any other statutory reporting obligation or disclosure obligation that the Bank may be subject to now or in the future according to applicable laws.

Where possible, personal data is anonymized or restricted and summarised for analysis purposes.

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

The purpose of the processing of personal data is to ensure internal governance and control of our business operations and to carry out necessary analyses and mandatory financial reporting.

We have a legitimate interest in controlling and quality assuring the personal data that we have stored in our systems.

We have a legal obligation to have in place policies and procedures for internal control and governance and to comply with mandatory reporting and disclosure obligations.

### **How long do we retain your personal data?**

We will retain your personal data for the longer of the period required by applicable law or such other period necessary for us to meet our operational obligations, such as proper governance and responding to legal claims or regulatory requests.

### **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 Luxembourg S.A. is responsible for the processing of your personal data.

DNB Bank ASA, as the parent company, also conducts financial reporting on behalf of and including data from other companies in the DNB Group, including DNB Luxembourg S.A. DNB Bank ASA is then generally additional controller.

### **What type of personal data do we process?**

- identification data
- contact details

- financial data
- Know your customer data
- Tax Information

### Who do we share your personal data with?

We are obliged to report and disclose personal data to local and foreign authorities, tax authorities, financial service regulators, judicial authorities and other public or regulatory authorities in case of statutory or regulatory obligation and/or in response to an authorized request. This include our supervisory authority CSSF and Central Bank of Luxembourg.

Personal data are shared with DNB Bank ASA when necessary to perform financial reporting or for risk management.

Personal data is shared with service providers.

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## Risk management and risk modelling

### How do we process personal data?

We are required to have processes to identify, measure, report, manage, mitigate and control the risks to which the institutions are or may be exposed.

We will process credit information and other personal data in accordance with the provisions of the applicable laws. This processing takes place in connection with the establishment of your customer relationship, determining which products and services are adequate for you and the use of systems to calculate capital adequacy requirements for credit risk.

We have models and procedures for approving and managing credit, control mechanisms, as well as internal guidelines for classifying and quantifying our credit risk and other relevant risk.

We process personal data in models and estimations provided by the DNB Group that are used to assess how much risk the Bank is assuming. The models produce a set of key figures (PD, LGD and EAD), which are necessary to determine how much risk capital the bank must hold at any given time. The key figures are estimated for each agreement the customer has with us. The key figures may later also be used in our risk reporting on the processing of customer applications for e.g. credit at a high aggregated level. The information is collected on an ongoing basis, as it is necessary for us to continuously update the risk situation.

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

The purpose of the processing of personal data is to calculate the correct capital requirement and ensure better risk management for the DNB Group.

We have a statutory obligation to process your personal data for this purpose, including pursuant to the CRR/CRD IV Regulations.

### How long we retain your personal data?

We will retain your personal data for the longer of the period required by applicable law or such other period necessary for us to achieve the purpose of the processing.

### 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 Luxembourg S.A. is responsible for the processing of your personal data.

DNB Bank ASA is as parent company of the Bank additional controller of the processing of data.

### What type of personal data do we process?

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

### Who do we share your personal data with?

We share the data with companies of the DNB Group, supervisory authorities and Central Bank of Luxembourg.

Personal data is shared with service providers.

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## Security and incident management

### INCIDENT MANAGEMENT

#### How do we process personal data?

We may be required to process personal data both before and if a crisis situation or incident occurs in the Bank. This will be personal data that is related to an incident such as violence, threats, unwanted behaviour, accident, operational mistakes, security, compliance or data breaches.

Personal data processed in this context relates to the event itself. The incidents may contain both general personal data, but also special categories of personal data such as health data.

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

The purpose of the processing of personal data is to detect and handle a crisis situation.

We are legally obliged to process personal data for this purpose, and the legal basis is the regulatory statutory requirements that apply to the financial industry regarding security and incident management.

#### How long do we retain your personal data?

We store events in access-controlled internal information systems and retain the personal data for as long as necessary to fulfil the purpose of the processing.

#### 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 Luxembourg S.A. is normally responsible for the processing of your personal data.

#### What type of personal data do we process?

- identification data
- special categories of personal data collected from the data subject during incident management, including health data

- Other personal data depending on the type of incident

### Who do we share your personal data with?

The Bank outsources IT tasks relating to hosting, operations, development, maintenance, testing and support of IT infrastructure, IT security and IT Incident Management to the DNB Bank ASA as well as task related to IT support, maintenance and development to various other third-party service providers. These service providers, and their sub- service providers, may have access to your data in connection with incident management.

We may share personal data within the DNB Group for internal processing purposes. In addition, we may share information with external authorities such as the police.

We may also share data with service providers who process personal data on our behalf.

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## IT SECURITY

### How do we process personal data?

Security primarily relates to protecting the Bank against crime and other intentional and undesirable incidents, but also unintentional incidents as a result of errors and accidents.

It is very important for us to protect our equipment, systems and information from damage, misuse, unauthorised access, alteration and vandalism. In this regard, a number of different security measures and systems are needed to detect and prevent unwanted incidents and damage to our assets and services, as well as to handle incidents that do occur.

We process personal data to achieve this purpose. This will typically be personal data such as your user identity and IP address. The information is processed by analysing internet activities on our secure networks and the use of our systems. We continuously seek to ensure that your personal data is protected against loss, destruction, corruption or unauthorised access.

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

The purpose of the processing is prevention, detection and handling of IT security incidents in the Bank.

We are legally obliged to process personal data for this purpose, and the legal basis is the regulatory statutory requirements that apply to the financial industry regarding security and incident management, as well as data protection rules and legislation.

### How long do we retain your personal data?

We retain your personal data as long as it is necessary to achieve the purpose.

### 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 Luxembourg S.A. is normally responsible for the processing of your personal data.

### What type of personal data do we process?

- identification data
- IP address
- digital behaviour data.

### Who do we share your personal data with?

The Bank outsources IT tasks relating to hosting, operations, development, maintenance, testing and support of IT infrastructure, IT security and IT Incident Management to the DNB Bank ASA as well as task related to IT support, maintenance and development to various other third-party service providers. These service providers, and their sub- service providers, may have access to your data in connection with IT security measures.

We may share personal data within the DNB Group for internal processing purposes, and supplier of IT security. We may also share data with suppliers who process personal data on our behalf.

In addition, we may share information with external authorities such as the police.

We may also share data with service providers.

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## PHYSICAL SECURITY – GUEST REGISTRATION

### How do we process personal data?

When you visit our offices and register as a guest in our system, we register personal data about you.

The personal data we collect is your name, date and time of visit and name of company, if applicable.



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

The purpose of the processing is to keep track of where visitors are in our buildings. This is to ensure the safety of people, our assets and our property, as well as to handle incidents and criminal offences that should arise. The purpose is based on both preventive and reparative considerations.

We have a legitimate interest for this processing of your personal data. Our legitimate interest is to keep track of where visitors are in our buildings.

### How long do we retain your personal data?

We retain your personal data as long as it is necessary to achieve the purpose.

### 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 Luxembourg S.A. is responsible for the processing of your personal data.

### What type of personal data do we process?

- contact details

### Who do we share your personal data with?

We may share information with external authorities such as the police and other contingency authorities.

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## 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 complaints, disputes and legal processes for debt recovery or other disputes. The type of personal data we process depends on the Bank's legal 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 a complaint or legal dispute. If we did not retain case history, it would not be possible for us to handle complaints, disputes and other legal processes.

We process personal data about our customers in regards to possible and actual legal claims only if it is relevant to the case we 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 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 and participate in ombudsman and complaint processes.

We also have a legitimate interest in being able to process personal data in order for our legal advisors to provide legal advice.

### **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.

We retain your personal data for no longer than is necessary for the purposes for which the Personal Data are processed by the Bank and in accordance with our legal obligation. In general, the Bank store the personal data 10 years after the end of the business relationship with customers.

Exceptionally, the Bank may store data beyond the periods mentioned above, as may be imposed or permitted by law. The statute of limitations refers to the time limit imposed by law in which a lawsuit or criminal case can be filed. The common limitation period is 30 years in Luxembourg (Article 2262, Civil Code). Limitation periods run from the date when the obligation fell due (in contracts), or when the damage occurred (in tort), and start from the end of the last day of the relevant period. However, these limitation periods can be suspended or interrupted (Articles 2242 to 2259, Civil Code).

### **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 Luxembourg S.A. is responsible for the processing of your personal data.

### What type of personal data do we process?

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

### Who do we share your personal data with?

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

We may also share details of the case with DNB Bank ASA for risk management.

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## IT infrastructure, IT hosting, IT support, email management etc.

### How do we process personal data?

We outsource tasks relating to the hosting, operations, development, maintenance, testing and support of IT infrastructure, IT security and IT Incident Management, as well as email management, to the DNB Bank ASA and various other third-party service providers. For some services, cloud computing services are used. These service providers, and their sub- service providers, may have access and storage to your data in connection with performing their duties under the outsourcing arrangement.

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

The purpose of the processing of personal data is done in order to ensure regulatory compliance, to benefit from the technical resources of skilled specialists, and to provide the customers with high quality services. We have a legitimate interest to process your personal data in connection with making use of IT service providers.

### How long do we retain your personal data?

We retain your personal data for no longer than is necessary for the purposes for which the Personal Data are processed by us and in accordance with our legal obligation. In general, we store the personal data 10 years after the end of the business relationship with customers.

### 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 Luxembourg S.A. is the data controller for the processing of your personal data.

### What type of personal data do we process?

- identification data
- contact details
- business relations
- relationship data
- financial data
- Know your customer data
- Tax information
- for a corporate account, we process personal data about the person who creates the account or represents the company and other connected persons.

### Who do we share your personal data with?

We will share your data with DNB Bank ASA and external service providers whose participation is necessary for the provision of services to customer and that process data on our instructions.

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## How we use cookies

### What are cookies?

Cookies are small text files that are stored and read on your device, for example on your computer or mobile phone, when you visit a website. Among other things, cookies make it possible to distinguish visitors to a website from each other and to collect data about how they use the website.

### Managing cookies

We are working on a better solution for managing cookies.

For now, you can manage how you want us to use [your cookies here](#).

### Why we use cookies

We use cookies on our website ([dnb.no](https://dnb.no)) for the following purposes:

- To make sure our website works.
- To ensure security, including detecting misuse of our website.
- To remember the settings and choices visitors make on our website.
- To map usage patterns on our website in order to make improvements.
- To track visitor behaviour in order to personalise our marketing.

The data we process by means of cookies will in many cases constitute personal data. You can read more about how we process personal data under the chapter 'Why we process personal data'.

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## Who do we share your personal data with?

Data protection rules and legislation regulate how and when sharing with third parties may take place. In addition, there are provisions on confidentiality in several other acts that apply to the financial and securities sectors. In accordance with Article 41 of the Luxembourg Banking Act, April 5, 1993, we are subject to professional secrecy in relation to information about customers and prospective customers, which may impose additional restrictions concerning data transfers.

### Third parties

There are several situations where we share personal data with third parties. Such third parties include e.g. the authorities and service providers and business partners. We also share personal data with the companies in the DNB Group in specific situations.

Examples of third parties receiving your personal data:

- Commission de Surveillance du Secteur Financier (CSSF)
- Central Bank of Luxembourg (BCL)
- Data Protection Supervisory Authority (CNPD)
- Luxembourg Tax authorities (for continuation to relevant tax authority)
- public, financial, taxation, regulatory or judicial authorities, in countries where we operate, to the extent permitted by law
- judicial/Investigative authorities such as the police, public prosecutor, courts, ombudsman, arbitration and mediation bodies
- certain regulated professionals, such as lawyers, notaries or auditors, professional advisers
- other financial institutions, including in particular credit institutions, insurance companies and credit card issuers, clearing houses, correspondent, custodians, deposit banks, payment and information service providers in accordance with PSD2, specialized financial companies (e.g. service providers for SEPA payments, SWIFT services), fund managers
- any third party investment manager providing investment services to you
- external service and outsourcing providers whose participation is necessary for the provision of services to clients or compliance with legal obligations
- DNB Group for various purposes as mentioned in this notice.

## Data processors

We use data processors in several situations. A data processor is a third party who processes personal data on our behalf. There are also data processing relationships within the DNB Group, such as when another company in the DNB Group is processing data on the Bank's behalf, or vice versa. The data processor does not have its own purposes for processing personal data.

We will contractually require all third party suppliers who process personal data on our behalf to have appropriate security and organisational measures in place to comply with privacy and data protection laws.

We have data processors in Luxembourg and in other countries both inside and outside the EEA, such as:

- software providers
- cloud solution providers
- consultants
- service providers
- companies in the DNB Group

## Sharing between companies in the DNB Group

Sometimes we need to share personal data about you within the DNB Group. For instance, this may be because the entities in the DNB Group acts as service provider for the Bank or to fulfil customer agreements, to meet obligations under company, banking and finance law, 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.

## Transfer of personal data to countries outside the EU/EEA

In some cases, we transfer personal data to organisations in countries outside the EEA, e.g. providers of IT services or other data processors. We can only make such transfers if the party to whom we transfer personal data has provided the necessary guarantees that the level of protection of the personal data is approximately the same as in the EEA.

It is also a requirement that the personal data concerned is ensured enforceable and effective rights related to the protection of this personal data in the third country.

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:

- The European Commission has determined that there is an adequate level of protection in the country in question.
- 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).

- Exceptions for special cases, for example to fulfil an agreement with you or when you give your consent to the specific transfer.
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## Applicable Laws

The Bank will process personal data in accordance with applicable data protection laws and regulations, notably the General Data Protection Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR") and any other EU/EEA or national legislation that implements or supplements the foregoing. The Bank will also process personal data in accordance with its General Terms and Conditions of Business and this Privacy Notice.

In case any other similar data protection laws and regulations to the GDPR will also apply to the Bank, then the Bank agrees to comply with such laws and regulations and any references to the GDPR are to be understood as references to the equivalent provisions of the similar data protection laws.

Specifically, in relation to customers with their ordinary residency in Switzerland, the Swiss Data Protection Act (the FDPA) applies to the Bank in addition to the GDPR. Any references to the GDPR are thus to be understood as references to the equivalent provisions of the FDPA. By meeting the GDPR requirements, the Bank will fulfil most of its obligations under the FDPA. If there is a difference in the level of protection offered to a customer between FDPA and GDPR, the higher level of protection shall be applied, unless Luxembourg or foreign laws and regulations applicable to the Bank requires the Bank to a certain course of action.

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Amendments to the privacy notice

This text was last updated on October 1, 2024