

Saldo Bank UAB “Finnish Branch” Privacy Policy Principles

Data protection

We act as a data controller, so we are committed to protect the rights and privacy of our customers and ensure the security of their personal data. This Privacy Policy describes how we collect, use, store and protect personal data.

By using our website, services and products, and by contacting us, you give a consent to the collection, processing and disclosure of your personal data in accordance with this Privacy Policy.

Why do we collect your personal data?

Data must be collected in order to provide our customers with high-quality services and to pursue the activities in accordance with the requirements established by laws. We use the collected data to develop our business, develop the products and keep in touch with our customers.

What kind of data do we collect?

Personal data is primarily collected directly from our customers. These data includes information such as your name and surname, personal number and residential address. Moreover, we collect information about your use of our products and services. On the other hand, we also need additional information that we use to supplement the primary information because we want to ensure that it is accurate and up-to-date.

Who are the recipients of personal data?

We do not usually disclose personal data, but in some cases, it may be disclosed to our service providers as we seek to provide better services to our customers, make more informed credit decisions and act as required by the laws of the Republic of Finland.

What are your rights related to personal data?

Our customers always have the right to access, review and update any personal data we collect, which may be inaccurate or out of date, as well as to request the deletion of personal data that is not necessary for processing, or to prohibit or revoke direct marketing, marketing research or surveys.

Use of an automated decision-making system

Saldo Bank UAB Suomen Sivuliike credit decisions are based on an automated decision-making process. We apply the automated decision-making, including profiling, in order to enter into or perform a contract with our customers, and comply with the requirements prescribed by the legal acts. Our customers have the right to request human intervention when making credit decisions, thus enabling them to express their opinion or challenge automated decisions when such decisions have legal or other consequences.

We may apply the automated decision-making, including profiling, in the following cases:

- In marketing, we profile your personal data, i.e., we carry out automated personal data processing evaluating certain personal aspects concerning you in order to assess your interests, behaviour, etc., which then allows to anticipate your needs more accurately, and provide you an offer, service and/or product which meets your interests best;
- In the process of the analysis and assessment, we apply automated-decision making related, for instance, to the credit rating, credit risk management, personal credit rating, entering into a contract for services;
- To ensure implementation of the measures for anti-money laundering and counter-terrorist financing, the profiling is used to assign you to certain categories depending on your risk exposure, operational risks (of main economic activities).

Profiling will involve processing of the following personal data concerning you: your name, surname, date of birth, job position, profession, education, data on the customer's behaviour on our website, and the information on the website use. Such personal data will be processed during the term of the contract.

More details are provided in the Privacy Policy below.

SALDO BANK UAB SUOMEN SIVULIIKE PRIVACY POLICY

I. GENERAL PROVISIONS

1. Saldo Bank UAB Suomen sivuliike, business ID 3273394-6, office address: Lautatarhankatu 10, 00580, Helsinki, (hereinafter referred to as the Company), respecting your privacy and personal data, undertakes to protect your right to the lawful processing and protection of your personal data. This Privacy Policy (hereinafter referred to as the Policy) provides detailed information about the processing of your personal data or any other data we may collect about you.
2. Your personal data is processed in accordance with the General Data Protection Regulation (EU) 2016/679 (hereinafter referred to as the Regulation), Data Protection Act (1050/2018), the Act on Preventing Money Laundering and Terrorist Financing (444/2017), other legal acts and documents regulating the protection of personal data.

II. DEFINITIONS

3. **Personal Data** shall mean any information related to a natural person - a data subject, who is or may be identified, directly or indirectly, in particular by an identifier such as name and surname, personal identification number, location and internet identifier or by one or more physical, physiological, genetic, mental, economic, cultural or social identity characteristics of that natural person.

4. **Data Subject** shall mean a person (you), whose personal data the Company processes or intends to process for the specified purposes and means.
5. **Customer** shall mean a person who has applied to the Company for financial services, as well as his or her spouse; or (ii) a person with whom the Company has entered into an agreement for the provision of relevant financial services;
6. **Profiling** shall mean any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, personal preferences, interests, reliability, behaviour, location or movements.
7. Other definitions used in the Policy shall be understood as they are defined in the legal acts of the Republic of Finland and the European Union.

III. PURPOSE AND LEGAL BASIS OF PERSONAL DATA PROCESSING

8. The Company processes your personal data for the following purposes:
 - 8.1. Personal identification;
 - 8.2. Creditworthiness and risk assessment;
 - 8.3. Direct marketing;
 - 8.4. Implementation of consumer credit agreement;
 - 8.5. For the purpose of entering into an irrevocable deposit agreement;
 - 8.6. To ensure fulfilment of obligations, as determined by the legal acts;
 - 8.7. For the purpose of ensuring compliance with the requirements related to the prevention of money laundering and terrorist financing, as well as verification whether any sanctions apply;
 - 8.8. To perform debt management;
 - 8.9. To protect legitimate interests of the Company;
 - 8.10. The creation and development of financial services and improvement of service quality;
 - 8.11. For the purpose of administration of enquiries, complaints and requests;
 - 8.12. For the purpose of confirming the content of calls and ensuring the quality of services;
 - 8.13. For the purpose of statistics and ensuring the quality of services (by means of cookies);
 - 8.14. For the purpose of direct marketing;
 - 8.15. For the purpose of external and internal audits;
 - 8.16. For the purpose of making a record of personal data breaches.
9. Your personal data may be processed in the Company on the following grounds:
 - 9.1. **Personal Consent.** You have given consent to the processing of your Personal Data for the purposes set out in Section III of this Policy or for some of these purposes.
 - 9.2. **Contract Performance.** The processing of your personal data is necessary to ensure the execution of the agreement to which you are a party or so that

we could take actions upon receipt of your application to enter into a contractual relationship with the Company.

- 9.3. **Legal obligation.** The processing of your personal data is necessary in order for us to fulfil the requirements of the legal acts of the European Union and the Republic of Finland applicable to the Company.
- 9.4. **Legitimate Interests.** Data processing is necessary to protect your interests and interests of the Company.

IV. COLLECTED PERSONAL DATA

10. The Company collects the following personal data for the purposes specified in Section III of this Policy:
 - 10.1. Data about the person (name, surname, the date of birth, personal number, position, profession, education).
 - 10.2. Data related to the person identification (copy of identification document, date and method of identification, IP address from which you applied for identification, video record and date of video record or photo).
 - 10.3. Personal contact details (telephone number, declared and actual place of residence (address), e-mail address).
 - 10.4. Data on marital status (marital status, number of minor age children).
 - 10.5. Data related to payments (bank account and (or) payment card numbers, unique text of the payment purpose, payment type, payment date, payment document number, unique transaction archive number, customer code in the payee's information system, currency equivalent).
 - 10.6. Data related to creditworthiness assessment and debt administration (your income and income of your family, type of income, financial liabilities to financial institutions or other persons, credit rating, information on delays in fulfilling existing or past financial liabilities, credit history, information on current and former employers, recruitment and dismissals, business or individual activities, received and assigned permanent and one-off social benefits, circumstances that may affect your economic or financial situation or ability to repay or pay the loan, other significant circumstances related to your financial situation or ability to properly meet obligations).
 - 10.7. Information on whether you are / are not included in the Inactive and a register of persons with limited factors, information on whether you are / are not included in the list maintained by the Supervisory Authority of persons for whom applications have been submitted to prevent them from concluding consumer credit agreements).
 - 10.8. The source of funds, nationality, data indicating whether a person is a politically exposed person (PEP), and other data to the extent necessary for ensuring compliance with the requirements related to the prevention of money laundering and terrorist financing.
 - 10.9. For the purpose of external and internal audits, the data concerning all the employees, customers, representatives of business partners contained in the information systems and paper documents.
 - 10.10. Customer's website behavioural and usage information. This includes monitoring a person's online behaviour and use of the Services. This is done

by using cookies and other tracking technologies. The information collected consists of, for example, the actions taken by a person on the site.

- 10.11. For the purpose of confirming the content of calls and ensuring the quality of services (call recording), audio recordings of phone calls between employees and other call participants shall be processed.

V. SOURCES OF PERSONAL DATA

11. Your personal data are collected from the following sources:
 - 11.1. Data received directly from you;
 - 11.2. Credit institutions;
 - 11.3. The Digital and Population Data Services Agency of Finland;
 - 11.4. The credit information register of Suomen Asiakastieto Oy;
 - 11.5. The Positive credit register of the Tax Administration Incomes Register Unit;
 - 11.6. The credit information register of Bisnode Finland Oy;
 - 11.7. Official registers to the extent permitted by law;
 - 11.8. Supervisory authorities;
 - 11.9. Independent credit intermediation companies;
 - 11.10. From other Third Party registers and information systems, when the Customer's personal data is processed in accordance with the requirements of legal acts.

VI. SUBMISSION OF PERSONAL DATA

12. Your personal data will be disclosed to other parties to the extent necessary for the purposes set out in Section III of this Policy.
13. The Company may transfer your personal data specified in Section IV of this Policy to the following entities:
 - 13.1. Other companies that at that time belong to the same group of companies as the Company.
 - 13.2. Persons involved in concluding, amending and enforcing a consumer credit agreement or any other agreement (for example, persons providing translation, communication, printing, postal and payment services, as well as financial institutions, notaries, guarantors, companies providing accounting or IT services).
 - 13.3. Law enforcement authorities (on receipt of their request), supervisory authorities.
 - 13.4. Banks, credit and financial institutions that provide financial services.
 - 13.5. The new creditor, in cases of assignment of claim rights.
 - 13.6. Third parties to whom the Company has pledged its claims to the Customer arising from the concluded agreement with the Customer.
 - 13.7. Third parties involved in safeguarding the Company's legitimate interests (such as the debt collection service provider).

- 13.8. Third parties involved in performance of the Company's duties under the law (for example, investigative bodies, notaries, tax administrators, the Data Protection Ombudsman, the police).
 - 13.9. Third parties who need personal data to ensure execution of the Consumer Credit Agreement concluded with the Customer.
 - 13.10. Investors and potential investors of the Company, provided that these persons ensure confidentiality and protection of personal data.
 - 13.11. Entities providing audit services.
 - 13.12. Finnish and foreign credit and financial institutions or intermediaries upon their application to the Company, when these persons seek to provide services requested by the Customer, financial advisers, lawyers, auditors and other service providers of the Company, provided that these persons ensure confidentiality and protection of personal data.
 - 13.13. The Positive credit register of the Tax Administration Incomes Register Unit.
14. In some cases, your personal data may be transferred outside the European Economic Area. Such transfers can only take place on a legal basis and in compliance with the requirements provided for in Chapter V of GDPR.

VII. DATA STORAGE TERMS

15. The Company shall store personal data for no longer than required for the purposes of data processing. When personal data are not needed, they are destroyed or depersonalized, except for those that must be stored or transferred to the state archives in cases prescribed by law.
16. Personal data is processed for the duration of the contractual relationship. After the end of the contractual relationship, the data is deleted after 10 years at the latest in accordance with the deletion process followed by the controller. Data collected under legislation on the prevention of money laundering and terrorist financing and only for that purpose will be deleted 8 years after the end of the contractual relationship. If you have not fulfilled your obligations towards the company according to the credit agreement, the contractual relationship with you has not ended.
17. If you do not enter into a credit or deposit agreement with the Company, your personal data will be deleted at the latest within 24 months from the date of receipt of the credit or deposit application. A possible copy of the identity document and the photo or video recording used for identification will be deleted within 30 days after the application has expired, if no business relationship is or has been created between the applicant and the data controller.
18. Call recordings are deleted 7 months after the call.
19. Upon termination of the contractual relationship, the Company and other companies that at that time belong to the same group of companies may process your personal data for direct marketing purposes in accordance with applicable law.

VIII. YOUR RIGHTS

20. In accordance with the procedure set out in the Policy you have the right to:
 - 20.1. know (be informed) about the processing of your personal data;
 - 20.2. access your personal data being processed, and receive information on the manner of their processing;
 - 20.3. demand rectification or erasure of your personal data (right to be forgotten) or restriction of the processing of your personal data;
 - 20.4. receive your processed personal data in a systematized computer-readable format (right to data portability);
 - 20.5. object to the processing of your personal data;
 - 20.6. request that you are not subject to a decision based solely on automated data processing, including profiling (with the exceptions provided for).
21. Without your identification, the Company may not provide personal data about you or any related information.
22. You have the right to obtain a confirmation from the Company whether personal data related to you are being processed, and if such personal data is being processed, you have the right to access the personal data.
23. You have the right to demand that the Company correct inaccurate personal data related to you without delay. Depending on the purposes for which the data were processed, you have the right to request that incomplete personal data be supplemented.
24. You have the right to request that the Company delete personal data related to you without delay, if:
 - 24.1. personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - 24.2. you revoke the consent on which the processing of your personal data is based and there is no other legal basis for the processing of the data;
 - 24.3. you object with processing of data when the processing is carried out on the basis of consent, and there are no overriding legitimate reasons to process the data;
 - 24.4. you do not consent to the processing of data for direct marketing purposes;
 - 24.5. your personal data has been processed illegally.
25. Personal data must be deleted in accordance with the requirements of legal acts of the Republic of Finland and the European Union.
26. Your request to delete personal data, including the Company's obligation to instruct data controllers to delete such data, does not apply when the processing of the data is necessary in at least one of the following cases:
 - 26.1. to exercise the right to freedom of expression and information;

- 26.2. in order to comply with the legal acts of the European Union or the Republic of Finland, which apply to the data controller, legal obligations have been established, which require the processing of data;
 - 26.3. for statistical purposes, in accordance with Article 89 (1) of the Regulation, if your right (to be forgotten) may render it impossible or significantly impede the achievement of the purposes of that processing;
 - 26.4. to make, enforce or defend legal claims.
27. You have the right to request that the Company restrict the processing of your data in one of the following cases:
- 27.1. you dispute the accuracy of the data for a period during which the Company may verify the accuracy of the personal data;
 - 27.2. the processing of personal data is illegal and you disagree with the deletion of the data and instead ask for a restriction on their use;
 - 27.3. the Company no longer needs personal data for processing purposes, but they are needed by the data subject to make, enforce or defend legal claims;
 - 27.4. you do not consent with the processing of your data until it has been verified that the Company's legitimate reasons outweigh your reasons.
28. When personal data is processed for direct marketing purposes, you have the right, without giving reasons or motives, at any time to object to the processing of personal data related to you for such marketing purposes, including profiling insofar as it relates to such direct marketing.
29. Requests for exercising the above rights may be made in writing using the contact provided in the Final Provisions section below.

VIII. RIGHTS OF THE COMPANY

- 30. The Company has the right to process your personal data for the purposes and on the legal basis specified in Section III of this Policy.
- 31. The Company has the right not to consider your application to enter into a credit agreement or to refuse to enter into a credit agreement if your personal data required for concluding a credit agreement has not been provided.
- 32. The Company and other companies that at that time belonging to the same group of companies and their business partners have the right to use and disclose your personal data if to do so is permitted or required by the legislation of the Republic of Finland and the European Union.
- 33. The Company has the right to record telephone conversations between you and its employees and to use these records to check the quality of customer service and to train customer service personnel.

X. COOKIES AND TRACKING

34. The Company collects, manages and analyses information related to the use of its website.
35. The Company uses cookies and similar technologies in order to provide you with high-quality services, ensure cybersecurity, implement marketing, perform analysis of the use of the website and offer you the most interesting content of the website.
36. In the browser settings you can choose whether to accept the use of cookies. If you do not agree to the use of cookies, you can still use the website.
37. More details about cookies can be found on the website of the Company.

XI. FINAL PROVISIONS

38. If you have any questions regarding the processing of personal data, you can contact the Company by email: privacy.fi@saldo.com , by tel. 010 190100 (2,00 €/min + pvm/mpm, queuing costs pvm/mpm) or by letter: % Saldo Bank UAB Suomen sivuliike, Lautatarhankatu 10, 00580, Helsinki.
39. The law of the Republic of Finland shall apply to the implementation and interpretation of the provisions of this Policy.
40. This Policy does not constitute an agreement between the Company and you regarding the processing of personal data of the user. Under this Policy, the Company informs you about the principles of processing your personal data in the Company, therefore the Company has the right to unilaterally amend and (or) supplement this Policy at any time.
41. Amendments and (or) supplements to the Policy shall take effect after their publication on the Company's website.
42. If any provision of this Policy becomes or is declared null and void, the remaining provisions will remain in full force and effect.