

## FOREX BANK PRIVACY POLICY (DENMARK)

### Information on processing of personal data

This policy describes how we process your personal data under the EU's General Data Protection Regulation "GDPR", applicable from 25 May 2018 and replaces the Danish Data Protection Act. Personal Data means any information relating to an identified or identifiable natural person, such as name, contact details, personal identification number, account number, and other information that directly or indirectly can be attributed to you as an individual person. If you have any questions, please feel free to contact us at [dataansvarlig@forexbank.dk](mailto:dataansvarlig@forexbank.dk)

### Data controller

For the personal data about you processed to deliver the services requested by you, to contact you as a customer and to perform our assignments and obligations as a bank, FOREX Bank is the data controller (FOREX Bank, branch of FOREX Bank AB, Sweden, CVR no.: DK27748562, Jorcks Passage, Stairway B. Vimmelskafet 42, 3., DK-1162 Copenhagen K, tel. +46 (0)10-211 10 00, email: [dataansvarlig@forexbank.dk](mailto:dataansvarlig@forexbank.dk), website: [www.forexbank.dk](http://www.forexbank.dk))

### Data Protection Officer

If you cannot find the information that you are looking for in this privacy policy, or if you have any questions as to how your personal data is processed by FOREX Bank, you can contact our data protection officer via email: [dataansvarlig@forexbank.dk](mailto:dataansvarlig@forexbank.dk)

### Purpose personal data processing

FOREX Bank processes personal data about you to be able to deliver the services you request and to otherwise be able to perform bank activities and any related functions. The "agreement" between you as a customer and FOREX Bank consists of your use of some of the services that we offer, such as application for and use of a private account, savings account, internet banking, mobile bank, bank and credit cards, personal loans, securing of loans, currency and exchange services and other services.

Personal data provided in connection with contact (email, telephone etc.), applications, interest, the entering into or in connection with the drafting of any agreement, or which is otherwise registered in connection with the management of an agreement and for previous requests before or after an agreement has been entered into between you and FOREX Bank, is processed by FOREX Bank for the purpose of managing and documenting our customer relationship with you.

We also process personal data in connection with contact with you as a customer, potential or existing customers and any representatives of you (e.g. payers, guarantors, holders of charges/power of attorney, administrator etc.) and to attend to questions and complaints. If you call FOREX Bank, your call may be recorded, and in such case, you will be informed thereof before the recording starts. To maintain good customer service and register management, FOREX Bank may supplement personal data by obtaining information from private and public registers, e.g. by updating your address by means of the Danish Civil Registration System ("CPR-register").

Further, FOREX Bank processes personal data to collect and check personal data before a decision is made (e.g. to grant a loan) and to manage and perform concluded agreements. Processing of the personal data is also made for FOREX Bank to comply with mandatory obligations. Personal data is further processed for the purpose of market and customer analyses forming the basis of marketing, method and business development, statistics and risk management. Risk management also means processing of information about creditors and credit ratings for quality assessment of credits for capital adequacy purposes.

Personal data may also be processed for the purpose of granting financial advice or to provide information about FOREX Bank's services and products. If as a customer you have not opted out of advertisements, personal data may also be used for sending direct marketing and various offers.

Further, in some cases, FOREX Bank is obliged by law to disclose and otherwise process personal data to perform an obligation in relation to e.g. the Danish Financial Supervisory Authority, SKAT (the Danish Tax Authorities), the police and enforcement authorities (Danish, Swedish and foreign authorities) and to ensure compliance with the rules on bookkeeping, anti-money laundering, asset adequacy (risk management and quality assessment as regards credit) and the applicable rules concerning payment services, transaction monitoring and fraud control. Accordingly, processing of personal data is exercised for these purposes. FOREX Bank can check customer information against sanction lists, which we are obliged to by law or a decision from authorities or have a right to use to ensure that there is no failure of basic assumptions in relation to the performance of certain bank services. The processing of personal data may also, within the framework of the applicable rules on bank secrecy, be made within the FOREX group, both inside and outside the EU and EEA (European Economic Area) and for companies with which the FOREX Bank group has entered into collaboration to deliver its services. Accordingly, processing of personal data is exercised for the above stated purposes.

### Legal basis for processing of personal data

Processing of your personal data is made by FOREX Bank to the extent that it is required to perform the agreement to which you are a party and to implement measures based on your request before such an agreement is concluded. In addition, the processing of personal data is required when necessary to perform FOREX Bank's legal obligations (e.g. performance of obligations in relation to e.g. the Danish Financial Supervisory Authority, SKAT, the police and enforcement authorities in connection with bookkeeping, anti-money laundering, financing of terrorism, capital reimbursement and applicable rules concerning payment services, transaction monitoring and combating fraud).

In cases where you explicitly consent and thus accept that FOREX Bank processes certain personal data for one or more specific purposes, such consent constitutes the legal basis for the processing of your personal data. In such cases, where your consent is required, you will receive specific information about what the processing concerns and what the consent entails.

To the extent that FOREX Bank processes personal data in addition to what is required to perform the agreement, a legal obligation and in the absence of your express consent, such processing must be based on a balancing of interests, where FOREX Bank identifies a purpose that concerns the bank's legitimate interest, for which processing of personal information is necessary - and where FOREX Bank has carefully considered that your interests or basic rights and freedom rights in that context is not overridden and consequently require protection of the personal data. FOREX Bank has a legitimate interest in carrying out market and customer analyses, in developing the basis for marketing, in method and business development, and in statistics and direct marketing. If personal data is processed in connection with such activities, a balancing of interests constitutes the legal basis for the processing of personal data necessary for the purposes which concern these legitimate interests.

### Recipients of personal data

The personal data which you provide and the data that can be obtained from public registers for additional purposes is received and primarily processed by FOREX Bank. In addition, there are the following categories of recipients that also participate in the processing of the personal data, where relevant: a) Danish, Swedish and foreign authorities, to which FOREX Bank is obliged to disclose information under the above legal obligations, b) companies outside the FOREX group, both within and outside the EU and EEA area, and companies with which the FOREX group collaborates to perform its services, such as Upplysningscentralen (UC), Bankgirocentralen (BGC), Finansiell ID-teknik (mobile Bank ID) and credit rating agencies, business associates and sub-suppliers.

Under EU Payment Services Directive (PSDII), FOREX Bank is in some cases obliged to provide external payment service providers access to customer account information, provided customer has provided clear consent. In such case, personal data may be processed by an external payment service provider acting as personal data controller.

Your personal data may also be shared with FOREX Bank's subsidiary X-change (X-change in Sweden AB). X-change offers cash services (currency exchange services in currency exchange offices and web-based currency exchange service as well as purchase and transfer of currency) and has access to the system for handling cash services used by FOREX Bank. Thus, in certain cases, X-change is the recipient of the personal data about you which is processed by FOREX Bank.

### Transfer of personal data outside EU/European Economic Area

In some cases, FOREX Bank is obliged, in cooperation with the authorities, to transfer personal data to foreign countries and outside the EU/EEA (European Economic Area). In addition, such transfers can be made to businesses within the FOREX group outside the EU and EEA area and to businesses with which FOREX Bank collaborates to perform its services.

In the cases where personal data for which FOREX Bank is responsible, is transferred to countries outside the EU/EEA, this is made in compliance with the rules in the General Data Protection Regulation to maintain a similar degree of privacy protection. This implies that there is either a decision from the EU Commission to the effect that the protection level is adequate in this country, or that otherwise appropriate security measures have been taken - so that the receiving organization abroad acts under legally binding standard contractual clauses or binding corporate rules. In the absence thereof, FOREX Bank obtains specific permission from the supervisory authority or alternatively your explicit consent that the transfer of personal data to a foreign country may take place. If you are asked to consent to such transfer, you will receive information about any risks connected with the transfer. If you want information about applicable security measures in case of a transfer of your personal data outside the EU/EEA, then please contact [dataansvarlig@forexbank.dk](mailto:dataansvarlig@forexbank.dk).

### For how long is my data stored?

FOREX Bank stores your personal data as long as you are a customer with us, meaning for the entire period in which the agreement between you and FOREX Bank is in force. When the customer relationship and/or the agreement is terminated, FOREX Bank must still retain your personal data in order to make legal claims, benefit from the rights and perform our obligations in relation to any claims or questions from former currency exchange and bank customers and in relation to the authorities.

FOREX Bank's processing of personal data forms part of the legal obligation towards authorities, such as the Danish Financial Supervisory Authority, the police etc. and to ensure control under the rules on bookkeeping, anti-money laundering, financing of terrorism, capital adequacy and the relevant provisions on payment services, monitoring of transactions and combating fraud. These legal obligations entail that we are obliged to still retain keep some personal data even when you are no longer a customer with us. For these reasons, your personal data is retained for up to 10 years after your agreement and/or your customer relationship with FOREX Bank has been terminated.

If you are in contact with FOREX Bank without entering into an agreement, your personal data is generally stored for three months. However, it may be stored for a longer period of time under the requirements of the Danish Anti-Money Laundering Act. This processing is made based on a balancing of interests, in that FOREX Bank has a legitimate interest in storing your data to facilitate any further contact, e.g. if you have received a rejection of an application for an account and you want to submit a new application within a short period of time. To facilitate this process, the processing is necessary, and according to thorough contemplations, FOREX Bank has found that your

interests or basic rights and freedom rights in this context do not outweigh this legitimate interest.

If, in your contact with customer service, you have approved that the conversation be recorded, the conversation will be stored for up to three months. This processing is made based on a balancing of interests as FOREX Bank has a legitimate interest in processing the audio file both for training purposes, and for the purpose of developing the customer service department. Following thorough contemplations, FOREX Bank has found that your interest or basic rights and freedom rights in this context do not override our interest and demand protection of personal data.

If you request FOREX Loan Protection over telephone, your call will be recorded. This is done in order to document your request in preparation for your agreement with FOREX Bank. The recording will be saved for as long as it is needed for this purpose. Following your call, the written agreement along with mandatory information will be sent to you for signing.

### Your rights

You can contact us if you have questions about how your personal data is processed by sending an email to [dataansvarlig@forexbank.dk](mailto:dataansvarlig@forexbank.dk), or by calling on +46 (0)10-211 10 00. You are also entitled, free of charge, to request access, which contains a list of personal data about you processed by FOREX Bank and information about how the processing is carried out. To confirm your identity, FOREX Bank will send you excerpts from the register as a registered letter.

In addition, you are entitled to request rectification (correction of erroneous information), deletion (we will delete personal information which is no longer necessary or needs to be processed) and restriction (in some respects we stop processing) of our processing of your personal data. Also, you are entitled to be given the personal data about you which you have made available to FOREX Bank, in a structured, commonly used and machine-readable format if you want to transfer such personal data directly to another operator.

### Direct marketing

You may, at any time, free of charge, object to processing of your personal data being made for the purpose of sending direct marketing material to you. You can object by sending your request to [dataansvarlig@forexbank.dk](mailto:dataansvarlig@forexbank.dk) or by letter to FOREX Bank, branch of FOREX Bank AB, Sweden, Jorcks Passage, Stairwell B. Vimmelskaflet 42, 3. DK-Copenhagen K.

### Withdrawing consent

If FOREX Bank processes your personal data based on your express consent, you are always entitled to withdraw your consent - which means informing us that you no longer consent to the present processing of your personal data. The fact that you object to the processing does not affect the legality of the processing of your personal data which has already taken place up to the date of withdrawal of your consent.

### Complaints

You are entitled to file a complaint of FOREX Bank's processing of personal data to the Danish Data Protection Agency at [dti@datatilsynet.dk](mailto:dti@datatilsynet.dk) or +45 3319 3200.

### Why does FOREX BANK need your personal data?

If you have ordered, requested or entered into an agreement on any of the services offered by FOREX Bank, your specification of personal data is necessary to enter into such agreement. If you are already a customer with FOREX Bank, you may need to provide further personal data so that we can continue to deliver our services, and we will also have the possibility of adjusting existing agreements with you.

In addition to performing obligations under agreements entered into with FOREX Bank, you are not obliged to provide personal data. If you do not want to provide your personal data, FOREX Bank may not be able to deliver services or information to you as a customer or as otherwise in contact with FOREX Bank.

### Automated decision-making and profiling

For marketing purposes, FOREX Bank will process personal data of bank customers, currency exchange customers and other customers such as loan applicants, those who made currency reservation or have requested or utilised our services. Such processing of personal data is in part done by internal categorisation and analysis of customer groups and overall consumer and customer behaviour in general.

In addition, profiling (automated processing of personal data to evaluate personal aspects) is conducted to form supporting data and statistical conclusions regarding customer analysis for marketing, method and business development. Personal data processed are those submitted by yourself to FOREX Bank and supplementary data from public registries such as the government personal address registry SPAR and other government agencies as well as creditors and financial institutes. As a result of profiling, you may receive tailored marketing communications.

At any time, you have the right to object to the continued profiling and processing of your personal data for direct marketing purposes.

### From where have we received your personal data?

If FOREX Bank processes personal data about you not provided by yourself, it has been obtained from the Danish Civil Registration System ('CPR-register') and credit rating agencies. Personal data obtained from other sources concerns the categories of address information and credit investigation information.

### Currency customers – for those who order currency, exchange currency or use our currency services

FOREX Bank may request the contact information of currency customers (e-mail address and telephone number). Any provision of contact information is subject to your free choice. The contact information you provide may be used to contact you with information regarding the service you utilised as well as marketing and offers from FOREX Bank. If your consent is requested in a store location you will be provided with supplementary information regarding purposes and personal data processing on-site.

FOREX Bank also offers currency services to people who are not bank customers. In our currency exchange office, you can i.e. purchase and sell currency. If you want to perform a single or multiple separate transactions with us, and if you otherwise want to start a business relationship with FOREX Bank, it may be necessary to check your identity, age and principal. Moreover, it may be necessary to check if you are a politically exposed person, in which country your business is established, check against European sanction lists and obtain information about the objects and nature of the business relationship. FOREX Bank is obliged to take these measures as part of efforts to combat money laundering, financing of terrorism and to meet the customer demands and customer relations. The processing of your personal data is made to comply with the purposes and obligations stated above. FOREX Bank's legal obligations as a result of the Danish Anti-Money Laundering Act and applicable anti-money laundering regulations constitute the legal basis for the processing of your personal data.

You are not obliged to disclose your personal data to us, but if you choose not to do so, FOREX Bank cannot offer you currency services. When assessing risks and deviations in transactions, FOREX Bank may be obliged to report to the State Prosecutor for Serious Economic and International Crime (SØIK). Information in such reports is confidential.

FOREX Bank can require that you present a valid picture ID to check your age - we may not conclude agreements with persons under the age of 16 (Sweden and Norway) and 15 (Finland and Denmark, respectively).

### X-change – currency and cash services

X-change (X-change in Sweden AB) offers currency exchange services in its currency exchange office and web-based currency exchange service and purchase and transfer of currency. X-change is owned by and is the representative of FOREX Bank. As a customer of X-change, your personal data is processed in compliance with the privacy policy of FOREX Bank.