

FOREX BANK PRIVACY POLICY (NORWAY)

Information on processing of personal data

This policy describes how we process your personal data in accordance with the EU General Data Protection Regulation ("GDPR"), which entered into force 20 July 2018. Personal data means any information relating to an identified or identifiable natural person, e.g. name, contact information, personal identification number, account number, or any other data that may directly or indirectly identify you as an individual. If you have any questions, please contact personvernombud@forex.no.

Data Controller

For personal data about you that are processed by us in order to perform the services you request, to contact you as a customer and to comply with our legal obligations as a bank, the controller is FOREX Bank AB (FOREX Bank Norge (branch of FOREX Bank AB, Sverige), business registration no.: 985 090 882, address: Storgata 10A 0155 Oslo, + 46 (0)10-211 10 00, email address: personvernombud@forex.no, web www.forex.no).

Data protection officer

If you cannot find the information you seek in this privacy policy, or if you have any further question on how your personal data are processed by FOREX Bank, please contact our data protection officer by e-mail personvernombud@forex.no.

Purpose of personal data processing

FOREX Bank processes personal data in order to perform the services requested by you, and moreover to perform banking business and any related functions hereto. The "Agreement" between you as a customer and FOREX Bank, consists of you making use of any of the services offered by us, e.g. application for- and the use of a drawing account, savings account, Internet bank, mobile bank, debit and credit card, personal loan, loan commitment, foreign currency-, Internet currency- and exchange services, and also other services.

Personal data that are collected in relation to contact (email, phone or other), application, entering into or preparations for entering into an agreement, or in any other way are collected in the administration of an agreement, as well as any steps taken at your request or pursuant to an agreement between you and FOREX Bank, are processed by FOREX Bank for the purpose of administrating and documenting our customer relationship with you.

We also process personal data for contact purposes with you as a customer, potential or former customer, and your potential representatives (e.g. depositor, guarantor, mortgagor, agent, guardian, etc.), as well as to handle questions and complaints. If you call FOREX Bank, the call may be recorded and, in such cases, you will be informed of this prior to the start of recording. For the purposes of maintaining customer relationship management, FOREX Bank may supplement personal data by collecting data from private and public registers, e.g. by updating your address data using national registry office.

Furthermore, FOREX Bank processes personal data to collect and verify personal data in connection to decisions (e.g. to grant a loan), and to manage and perform agreements entered into. Personal data are also processed for the purposes of FOREX Bank's compliance with legal obligations. Personal data are also processed for market- and customer analysis, that forms support material for marketing, methodology- and business development, statistics and risk management. Risk management also entails the processing of data on credit customers and their creditworthiness for quality assessment prior to entering into credit agreements.

Personal data may also be processed in provision of financial advice or to provide information on FOREX Bank's services and products. Personal data may also be used, provided that you as a customer has not opted out of direct marketing messages, for the purposes of direct marketing and offers of different sorts.

Furthermore, in certain cases, FOREX Bank is obliged to disclose or otherwise process personal data comply with obligations for, e.g., The Norwegian Financial Supervisory

Authority, Tax Authority, NAV, Government Pension Fund, the Police and the Enforcement Authority (as well as other Norwegian and foreign authorities), and to provide control pursuant to the rules governing accounting, money laundering, credit agreements (risk management and credit rating) and current regulations on payment services, transaction monitoring and fraud control. In such cases, personal data will be processed for these purposes. FOREX Bank may control customer information against sanctions lists pursuant to obligations by law or administrative decisions, or we have the right to check to ensure that there are no failed contractual assumptions for us to perform certain banking services. Processing of personal data may also, within the framework of the current regulations for financial institutions, be carried out by companies within the FOREX group within and outside the EU and EEA (European Economic Area), and by companies that the FOREX Bank group cooperates with in order to provide its services. Personal data will then be processed for the purposes described above.

Legal basis for processing of personal data

Your personal data are processed by FOREX Bank to the extent it is necessary for the performance of an agreement to which you are a party, or in order to take steps at your request prior to entering into an agreement. Furthermore, personal data are processed for compliance with legal obligations for FOREX Bank (e.g. to comply with obligations to the Financial Supervisory Authority, Tax Authority, NAV, the Police and the Enforcement Authority in relation to bookkeeping, money laundering, terrorist financing and applicable regulations on payment services, transaction monitoring and fraud control).

In cases where you have given your explicit consent to FOREX Bank processing personal data for one or more specific purposes, this will constitute the legal basis for the processing of your personal data. In such cases, when you are requested to give your consent, you will receive specified information about the relevant processing activity and what the consent entails.

To the extent that FOREX Bank processes personal data beyond what is necessary to fulfill the agreement or legal obligation, and in the absence of explicit consent, such processing is based on a balancing of interests where FOREX Bank identifies a purpose related to a legitimate interest that makes processing of personal data necessary – and where FOREX Bank after careful considerations have concluded that your interests or fundamental rights and freedoms does not override our legitimate interests in this context and require protection of personal data. FOREX Bank has legitimate interests in conducting market- and customer analysis, providing support material for marketing, methodology- and business development, as well as statistics and direct marketing. When personal data are processed in connection with such activities, a balance of interests constitutes the legal basis for processing personal data that are necessary for purposes of these legitimate interests.

Recipients of personal data

The personal data you provide and those that can be collected from public registers for complementary purposes, are received and processed mainly by FOREX Bank. Additionally, the following categories of recipients may also take part in the processing of personal data where applicable: a) Norwegian and foreign authorities that FOREX Bank is obliged to inform to comply with the legal obligations described above, b) companies within the FOREX Bank group within and outside the EU and EEA and by companies that the FOREX Bank group cooperates with in order to perform its services, e.g. the Inquiry Office, the Bank Giro Central (BGC), Financial ID Technology (Mobile Bank ID), credit information companies, affiliates and subcontractors.

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 at exchange offices and online currency exchange services as well as purchase and transfer of currency) and has access to the cash handling system used by FOREX Bank. Thus, in certain cases, X-change is a recipient of your personal data processed by FOREX Bank.

Transfers of personal data outside the EU/EEA

In certain cases, FOREX Bank, in cooperation with the authorities, is obliged to transfer personal data abroad and outside the EU/EEA (the European Economic Area). Additionally, such transfers may be made to companies within the FOREX group located outside the EU and EEA and to companies that FOREX Bank cooperates with in order to provide its services.

In cases where personal data for which FOREX Bank is responsible are to be transferred to countries outside the EU/EEA, these are made in accordance with the Privacy Regulations rules to maintain an adequate level of protection. This entails that there are either an adequacy decision from the EU Commission stating that the relevant country ensures an adequate level of protection, that other appropriate safeguards exist – when the recipient organization abroad acts under legally binding standard data protection clauses – or binding corporate rules. In the absence of such safeguards, FOREX Bank will separately collect your explicit consent for the transfer of personal data abroad. In such cases where your consent for such transfer is requested, you will receive information about any risk associated with the transfer. If you would like to receive more information about applicable safeguards when transferring personal data outside EU/EEA, please contact personvernombud@forex.no.

For how long are my personal data stored?

FOREX Bank stores your personal data for as long as you are a customer of ours, i.e. during the entire period of time the agreement between you and FOREX Bank is valid. When your customer relationship and the agreement expire, FOREX Bank will still have to store your data to comply with public body regulations or comply with our legal obligations. FOREX Bank's processing is in accordance with legal obligations and the guidelines from the Financial Authority, Tax Authority, the Police, the Enforcement Authority and more. This includes regulations regarding bookkeeping, money laundering, terrorist financing and fraud control that in specific cases requires FOREX Bank to store certain personal data even when you are no longer our customer. These data can be stored for a maximum of 10 years after the termination of your customer relationship with FOREX Bank.

In cases where you are in contact with FOREX Bank, but do not enter into an agreement or make a transaction, your personal data will normally be stored for three months, unless specific circumstances require other action.

This processing is based on a balancing of interests where FOREX Bank has a legitimate interest in storing your data to facilitate further contact, e.g. if you have received a rejection for an application and within a short period of time will apply again. In order to simplify this process, processing is necessary and FOREX Bank has after careful considerations determined that your interests or fundamental rights and freedoms in this context do not override this legitimate interest.

If you in contact with customer service have agreed to the recording of the conversation, the conversation will be stored for up to three months. This processing is based on a balancing of interests where FOREX Bank has a legitimate interest in processing the audio file, partly for educational purposes and partly for the purpose of improving customer service. FOREX Bank has, after careful considerations, determined that your interests or fundamental rights and freedoms in this context do not override this legitimate interest and require the 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 may contact us for any questions about how your personal data are processed by sending an e-mail to personvernombud@forex.no. You also have the right to request access to the processing of our personal data free of charge, which contains a summary of your personal data processed by FOREX Bank as well as information on how the processing is executed. In order to control and verify your identity at a request for access, FOREX Bank will send the result of the access as a registered letter.

In addition, you have the right to request rectification (we correct inaccurate personal data), erasure (we remove personal data that no longer should or must be processed) and restriction (we cease the processing for certain cases) of our processing of your personal data. Moreover, you have the right to receive the personal data concerning you as provided to FOREX Bank, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

Direct marketing

You may at any time, free of charge, opt out of the processing of your personal data for the purpose of sending you direct marketing requests. You can opt out by following the link included in the marketing email or by sending an email to personvernombud@forex.no or by mail to FOREX Bank AB, Stora Nygatan 27, 111 27 Stockholm.

Withdrawing consent

If FOREX Bank carries out certain processing activities of your personal data based on your consent, you have the right to withdraw your consent at any time, - i.e. inform us that you no longer accept the current processing of personal data. However, objecting against the processing in this manner does not affect the lawfulness of processing based on consent before its withdrawal.

Complaints

You have the right to lodge a complaint about FOREX Banks processing of personal data to the supervisory authority Data-tillsynet (www.datatillsynet.no), phone number 22 39 69 00.

Why does FOREX Bank need your personal data?

If you have ordered, requested or entered into an agreement for any of the services provided by FOREX Bank, the disclosure of personal data is necessary for entering into such agreements. If you already are a customer at FOREX Bank, you may

be required to disclose additional personal data in order for us to continue to provide our services, and for us to be able to manage our existing agreement with you.

Except for fulfilling obligations under the agreement you have entered into with FOREX Bank, you are not required to disclose any personal data. If you do not wish to disclose your personal data, this may mean that FOREX Bank will not be able to deliver services, customer service or information to you as a customer or 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 your personal data which have not been collected from you, the information is retrieved from the national registry office and credit information agencies. Personal data collected from other sources correspond to the categories address details and credit rating information.

Currency customers - for those who order currency, exchange money 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 offers currency services also for those who are not bank customers. At our exchange offices you can purchase and sell currency among other things. If you want to perform one or more separate transactions with us or if you wish to initiate a business relationship with FOREX Bank, we may need to verify your identity, age and who your principal is. Additionally, we may need to check if you are politically exposed person, in which country your business is established, perform controls against European sanctions lists and obtain information about the purpose and nature of the business relationship. FOREX Bank is obliged to perform these measures as a part of the fight against money laundering, terrorist financing and to comply with requirements for customer control. The processing of your personal data in accordance with the above-mentioned measures is conducted to accomplish these purposes and obligations. FOREX Bank's legal obligations pursuant to applicable money laundering legislation and associated 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 may not be able to offer you our currency services. When assessing risks and aberrations in current transactions, FOREX Bank may be obliged to report to the Financial Authority. Personal data included in such reporting are subject to confidentiality.

FOREX Bank may request that you provide identity papers to verify your age - we are unable to enter into agreements with persons under 16 (Sweden and Norway) and 15 years (Finland and Denmark).

X-change - currency and cash services

X-change (X-change in Sweden AB) offers currency exchange services at exchange offices and online currency exchange services as well as purchase and transfer of currency. X-change is owned by and represents FOREX Bank. As a customer of X-change, your personal data are processed in accordance with the FOREX Bank Privacy Policy.