



FOREX PRIVACY POLICY (NO)

Information on processing of personal data

FOREX processes your personal data in accordance with regulation (EU) 2016/679 ("GDPR"), lov om tiltak mot hvitvasking og terrorfinansiering ("Anti-Money Laundering Act"), forskrift om kameraovervåkning i virksomhet ("Camera Surveillance Ordinance") and other supplemental legislation such as loven om behandling av personopplysninger ("Personal Data 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 an individual person.

If you have any questions regarding our processing of personal data, you can contact us at personvernombud@forex.no.

Why do we process your personal data and in which situations?

FOREX processes personal data for several different purposes. The main part of our processing is carried out to provide the services you have requested, and also to carry out payment services and related activities. "Services" means for example currency services, online currency services, exchange services and other services. To be able to provide these services we collect and process the personal data that you leave when contacting us by for example e-mail, phone and visits to our store locations.

We also collect and process personal data when you make an application or express interest in our services, and when entering into an agreement or in preparations thereto. This also includes personal data recorded when administering the contractual relationship with you, as well as other measures which have been taken before or after the conclusion of the agreement. If you have entered into an agreement, or in any other way ordered or requested any of the services FOREX offers, your provision of personal data is necessary to enter into such an agreement.

We also process personal data when you contact us as a current customer, potential

customer or past customer. If you are already a customer with FOREX you might have to provide additional personal data for us to be able to provide our services, and to be able to regulate our current agreement with you.

If you have representatives, such as financiers, guarantors, guarantee/warranty holders, fiduciaries, we may have to process personal data regarding those individuals.

If you call FOREX, we may record your phone call. In such case, you will be informed about this prior to recording.

For the purpose of keeping a good customer maintenance and file maintenance, FOREX may supplement personal data by retrieving information from private and public registries, for instance by updating your address information using the Folkeregistret ("National Population Register").

Processing of personal data is also done to fulfil FOREX's legal obligations, for example regarding archiving of accounting materials according to lov om årsregnskap m.v. ("Accounting Act").

As a currency customer, your personal data are processed for marketing purposes. This means that FOREX may send direct marketing, via e-mail or text messages regarding similar products or services. These contacts will take place as long as you do not choose to unsubscribe from receiving marketing. If the customer relationship between you and FOREX ceases, we will ask for your consent to be able to continue sending direct marketing. If you have never been a customer with FOREX we only send marketing via e-mail and text message after you have provided your consent. Whether or not you are currently a customer, you can at any time choose to unsubscribe from further marketing. For more information, see the section below "Unsubscribing from direct marketing".

Personal data are processed for market and customer analysis, used for marketing purposes, as well as model and business development and statistics.

Personal data can also be used for direct marketing and communicating various offers via text messages and e-mail. However, you can choose at any time to unsubscribe from

future communications of this kind by following the link in the e-mail or by contacting us at info@forex.no.

Furthermore, FOREX is in some circumstances obliged by law to disclose and otherwise process personal data in order to fulfil its obligations towards the authorities, for example Financial Supervisory Authority of Norway, the Norwegian Tax Administration, the Norwegian Labour and Welfare Administration, the Norwegian Public Service Pension Fund, police and the enforcement authorities, and also to comply with laws and regulations relating to accounting, anti-money laundering and payment services, transaction monitoring and fraud. In such cases, personal data are processed by us to be able to comply with our legal obligations. FOREX may check its customer information against sanctions lists that we are legally obliged or have the right to use to ensure that we are entitled to provide certain payment services.

Personal data may also be processed in companies with which FOREX group cooperates in the provision of services. In such cases, personal data are processed for the above specified purposes.

From where have we received your personal data?

FOREX primarily processes personal data that you have provided us. However, in some cases we retrieve personal data from the National Population Register. The personal data retrieved in such cases are address information.

If you do not want to provide personal data

You are not obliged to provide personal data to FOREX unless it is required by an agreement concluded with us. If you do not want to provide personal data it can entail that FOREX will not have the possibility to provide services, customer service or information to you as a customer or when you are in contact with FOREX.

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Unsubscribing from direct marketing

At all times and free of charge, you may object to the processing of your personal data for direct marketing purposes. This applies regardless of whether you are a current or previous customer with FOREX, or if you otherwise have provided previous consent. You can unsubscribe by clicking the unsubscribe link in our e-mails, or by submitting your request to personvernombud@forex.no, alternatively by mail to FOREX Aktiebolag, Stora Nygatan 27, 111 27 Stockholm.

Marketing that is not direct marketing, for example via regular mail, may be sent to you regardless of whether you are a customer or not, provided that you have not signed up for a service that limits such marketing or otherwise declined such marketing.

Video surveillance in our offices

Both your and our staff's security is important to us, and therefore we have chosen to use video surveillance in our offices. The recorded material is only used to pre-empt, prevent and investigate crime and suspicions of crime. The material may be provided to the police and prosecutor authorities.

The recordings take place 24 hours a day, and in specific cases sound is also recorded. The material is saved for 30 days. FOREX records and manages the recorded material in compliance with the GDPR, the Camera Surveillance Ordinance and the Personal Data Act. The legal basis for the storage is our legitimate interest, as we have carefully considered that your interests, fundamental rights and freedoms which require protection of personal data does not override our legitimate interest in this case.

Currency customers – for you who order currency, exchange money, or use our currency services

As a currency customer, FOREX may ask for your contact information such as e-mail address and phone number. You can choose if you want to provide contact information, and which categories of information you want to provide. If we ask for your consent in one of our store locations, you will at the same time receive information regarding the purposes and means of the processing of personal data. The contact information you provide us can be used to reach you with information regarding the service you want to utilise. The contact information may also be used for

direct marketing and offers via e-mail and text message concerning similar products or services from FOREX. These communications will occur if you do not unsubscribe from further marketing actions.

At our exchange store locations you can, among other things, buy and sell currency. If you want to perform a single or several separate transactions with us, or if you otherwise want to initiate a business connection with FOREX, we may have to verify your identity, age and who your principal is. For example, according to the Anti-Money Laundering Act we are obligated to identify our customers and verify their identity when establishing a permanent customer relationship. The same obligation applies for single transactions that exceed the thresholds mentioned in the fifth chapter of the Anti-Money Laundering Act, or single transactions where we suspect or have reasonable grounds to suspect that the transaction is a part of money laundering or financing of terrorism, which we are obligated to report according to the Anti-Money Laundering Act. Suspected transactions mean for instance transactions of exceptionally high value.

Furthermore, we might have to check if you are a politically exposed person, in which country your business is established, check information against European sanctions lists and retrieve information about the purpose and nature of the business connections. FOREX is obligated to take these measures, as a part of our work against risks for money laundering, against financing of terrorism, and to comply with the requirements of customer knowledge and customer relations as stipulated in the Anti-Money Laundering Act. FOREX's legal obligations emanating from the Anti-Money Laundering Act and applicable legislation regarding money laundering serves as the legal basis for this processing of your personal data.

You are not obliged to provide personal data to us, but if you choose not to do so it can entail that FOREX will not have the possibility to provide currency services. When assessing risks and deviations of transactions FOREX may be obligated to report to the National Authority for Investigation and Prosecution of Economic and Environmental Crime (Økokrim). Any data provided in such reporting will be classified.

FOREX may request that you show an ID to verify your age – we do not have the possibility to enter into agreements with

persons under 16 years of age (Sweden and Norway), and persons under 15 years of age (Finland and Denmark).

Automated decision-making and profiling

For marketing purposes, FOREX will process personal data of currency exchange customers and other customers such as those who made currency reservations 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 and supplementary data from public registries such as the National Population Register and other government agencies as well as 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. You can do that by contacting us at info@forex.no or by clicking the link in the marketing e-mails you have received.

Legal basis for processing of personal data

If FOREX processes your personal data to be able to provide our services it is done to the extent this is necessary for the performance of a contract to which you are a party or in order to take steps prior to entering into a contract at your request.

In addition, personal data are processed when it is necessary for compliance with FOREX's legal obligations, e.g. fulfilling obligations towards the Financial Supervisory Authority of Norway, the Norwegian Tax Administration, police or enforcement authorities. Such instances may relate to our legal obligations relating to accounting, anti-money laundering, combating the financing of terrorism, as well as applicable legislation regarding payment services, monitoring of transactions and fraud control.

In case you have explicitly given your consent to FOREX's processing of your personal data for one or several specific



purposes, such consent will form the legal basis for processing of your personal data. If we ask for your consent, you will receive specified information regarding the processing subject to your consent and on what your consent entails.

To the extent FOREX processes personal data more extensively than necessary for the purposes of performance of a contract or to comply with legal obligations, and the processing is not based on consent, the legal basis for such processing is FOREX's legitimate interests. FOREX has identified a legitimate interest for which the processing of personal data is necessary, and after careful assessment considered that your interests, fundamental rights and freedoms do not override FOREX's legitimate interests in such cases and do not require protection of personal data. FOREX has a legitimate interest to conduct market and customer analyses, prepare marketing activities, model and business development, statistics and to conduct direct marketing. In cases where personal data are processed in the context of such activities, FOREX's legitimate interests form the legal basis for such processing necessary for purposes of FOREX's legitimate interests as above.

Withdraw consent

If FOREX processes your personal data based on your explicit consent, you have the right to withdraw such consent at any time. To do so, please inform us that you no longer accept the processing of your personal data based on your consent. However, such withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Recipients of personal data

For the personal data disclosed by you and gathered from public registries to supplement data, FOREX is the main party receiving and processing personal data. In addition, the following categories of recipients may also receive personal data in some cases: a) authorities in Denmark and abroad to whom FOREX is legally obligated to disclose information as described above, b) companies with which the FOREX group cooperates to provide its services.

Transfer of personal data outside EU/EEA

Under certain circumstances, FOREX is obliged to transfer personal data abroad and outside the EU/EEA, in cooperation with

government authority. In addition, such personal data may be transferred to a company with which FOREX cooperates to provide its services.

In cases where FOREX is controller of data to be transferred outside the EU/EEA, such transfers are made in compliance with the GDPR, and other supplementary legislation such as the Data Protection Act, to ensure equivalent protection of personal data. This means that either, there exists a decision by the EU Commission on the third country in question and its ensuring of adequate level of data protection, or that other appropriate safeguards are in place in that the recipient of personal data in a third country is subject to standard data protection clauses or binding corporate rules. In the absence of above-mentioned grounds for transfer, FOREX will obtain a specific authorization from the competent supervisory authority or, alternatively, your explicit consent to the transfer of personal data. If we ask for your consent for such transfer, you will be informed of any possible data protection risks of the transfer. If you wish to receive additional information on the safeguards applicable to the transfer of your personal data outside the EU/EEA, please contact personvernombud@forex.no.

For how long is my personal data stored?

How long your personal data will be stored depends on the purpose of the processing.

If you are a customer, FOREX will retain your personal data if you remain our customer, i.e. as long as the agreement between you and FOREX remains valid. At the end of the customer relationship and upon agreement termination, your data will be retained by FOREX five more years, in order to manage legal claims and to exercise our rights and fulfil our obligations in relation to potential claims and inquiries by former currency exchange and in relation to authorities.

However, the processing of the personal data will only continue as long there is a legal basis for it. FOREX is required to process some personal data to address obligations in relation to authorities such as the Financial Supervisory Authority of Norway, the Norwegian Tax Administration, police and the enforcement authorities, and to ensure compliance with rules pertaining to accounting, anti-money laundering and combating the financing of terrorism and

applicable payment services legislation, transaction monitoring, and fraud. Due to these regulatory requirements, we are obligated to retain personal data also when you are no longer our customer. For the above reasons, your data will be retained for a maximum period of 10 years after the agreement has terminated and your customer relationship with FOREX ceased.

If you contact FOREX but do not enter into an agreement with us, your personal data will generally be retained for a maximum period of three months but may be stored further due to obligations under the Anti-Money Laundering Act. This processing is based on our and your legitimate interest of facilitating further contact. For instance, your account application may have been refused and you want to provide a new application within a short period of time. FOREX has, after careful assessment considered that your interests, fundamental rights and freedoms do not override FOREX's legitimate interest in such cases and do not require protection of personal data. To facilitate this process, the processing of personal data is necessary, and FOREX has after careful assessment considered that your interests, fundamental rights and freedoms do not override this legitimate interest.

Regarding personal data deriving from a scanned ID, for example name and identification number, such personal data will not be retained if the exchange transaction does not exceed the threshold. Exceptions to this main rule can be made if the ID is deemed to be invalid or is suspected to be fake. In such a case a copy of the ID will be stored for a maximum of 30 days before it is deleted. The purpose of such processing is that we have to be able to provide a copy of the ID to the police, if there is a suspected crime according to the Anti-Money Laundering Act. The legal basis for the storage is the necessity for us to comply with our legal obligations.

When in contact with customer service and if you have accepted that your phone call will be recorded, any such recording will be retained for a maximum period of three months. The legal basis for the processing of this personal data is FOREX's legitimate interests, as FOREX has a legitimate interest to process the sound file for education purposes and to develop customer service. FOREX has after careful assessment considered that your interests and fundamental rights do not override FOREX's legitimate interests in this

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particular case and do not require protection of personal data.

Your rights

If FOREX processes your personal data, you have several rights according to the GDPR.

You have the right to request a register extract, free of charge, containing a summary of your personal data processed by FOREX along with information on how such data is processed. To verify your identity, a registry extract will be sent to you by registered mail.

In addition, you have the right to request rectification, which means that we adjust inaccurate personal data.

In some circumstances you have a right to erasure, which means that we erase personal data where the processing of such data is no longer necessary.

You also have a right to request restriction of processing, which means that we restrict or limit the processing in some respects.

Furthermore, you may request data portability, meaning that you request that we provide personal data provided by you to FOREX in a structured, commonly used and machine-readable format if you wish to transmit those data to another controller.

Data controller

For all your personal data being processed, the data controller is FOREX Norge:

FOREX, subsidiary of FOREX AB Sverige (org. nr: 985 090 882). Address: Storgata 10A, 0155 Oslo. E-mail address: personvernombud@forex.no. Web site: www.forex.no. Phone number: +46 (0)10-211 10 00.

Data Protection Officer

FOREX has appointed a Data Protection Officer to oversee and make sure that all processing of personal data is compliant with the GDPR and supplementary legislation.

If you are unable to find the information you are looking for in this Privacy Policy, or if you otherwise have questions on how FOREX processes your personal data, you can contact our data protection officer at e-mail personvernombud@forex.no or by phone at +46 (0)10-211 10 00.

Complaints to the Norwegian Data Protection Authority

The Norwegian Data Protection Authority is the relevant authority responsible for the supervision of compliance of the GDPR. If you believe that FOREX processes personal data in violation of GDPR or other applicable legislation, you can lodge a complaint to the Norwegian Data Protection Authority via www.datatilsynet.no or by phone +47 22 39 69 00.