



Policy of SEB Companies in Lithuania on the Processing of Personal Data

Our aim is to keep you fully informed about the processing of your personal data, whether you communicate with us in person, electronically (for example, using our online banking, mobile applications, website) or in any other way of your choice. This document applies to you, if your data is processed by SEB companies in Lithuania.

The Policy of SEB Companies in Lithuania on the Processing of Personal Data (hereinafter the 'Policy') is intended to make you familiar with the purpose and basis on which we collect, use and share your personal data provided by you or otherwise collected by us at the level of SEB companies in Lithuania. The aim of this is to ensure fair and transparent collection and use of personal data.

Please take some of your time to read through the Policy and if you have any questions, do not hesitate to contact us in one of the following ways. Going forward, there may be modifications to the Policy, and we encourage you to review the Policy periodically.

Your personal data are processed in accordance with the General Data Protection Regulation (EU) 2016/679 (hereinafter - the GDPR), the Law on Legal Protection of Personal Data and other legal acts regulating the legal protection of personal data and the activities and services of financial institutions.

Personal data means any information directly or indirectly related to the data subject, i.e. you.

Data subject (you) means a natural person (customer, his / her representative, family member, guarantor, collateral provider, person seeking to conclude an agreement on a service provided by SEB in Lithuania, etc.), whose personal data we receive and use.

SEB companies in Lithuania (hereinafter 'SEB Lithuania') means any legal entity or its branch within the SEB Group, which has its registered office in Lithuania and acts as a controller or processor of personal data. The list of SEB companies in Lithuania and contact details are published on www.seb.lt. In the context of this Policy, SEB in Lithuania may mean AB SEB bankas, UAB "SEB Investicijų Valdymas", SEB Life and Pension Baltic SE, Lithuanian Branch or all these companies together

SEB Group means Skandinaviska Enskilda Banken, AB (publ.), a company established in Sweden, and all legal entities or subsidiaries directly or indirectly owned by it.

For the purpose of the present Policy, other terms used in the GDPR and the Law on Legal Protection of Personal Data shall apply.

Contact details of the data protection officer

In case of any questions regarding the processing of your personal data, please contact the Data Protection Officer of SEB in Lithuania by phone +370 5 268 2800, e-mail: duomenuapsaug@seb.lt, or by post: Konstitucijos ave. 24, LT-08105, Vilnius.

What is the data related to you that we collect?

We collect your basic personal data, such as, but not limited to:

- **Basic personal data**, such as name, surname, personal identification number, date of birth, telephone number, e-mail, postal address, residential address or address for correspondence;
- **Identification data**, such as personal document data, photo, IP address, Internet Banking login details and other browsing information, including details of when and from where you accessed our Internet Bank and website or other electronic platforms;
- **Data on your financial literacy**, such as education, investment knowledge and experience;
- **Data on your transactions in SEB Lithuania and other concluded agreements**, depending on the services provided to you by SEB Lithuania, e.g. bank account number, deposits, payment orders and / or other payment transactions, payment instruments and actions performed using them, monetary deposits, withdrawals, etc.;
- **Financial data**, such as the origin of funds, country of residence for tax purposes, bank accounts, payment documents, financial liabilities, assets, their types and value, credit history and creditworthiness, expenses and income, financial goals (e.g. how much you want to save and for what purposes);
- **Economic data**, such as your current / former job, your economic and commercial activities (the fact that you are a farmer, that you carry out individual activities, etc.), stability of your income, and other sources of income;
- **Socio-demographic data**, such as gender, marital status, number of dependents and family data;
- **Data on your online behaviour and habits**, which we identify based on your behaviour on our website, the Internet Bank or using other electronic channels of SEB Lithuania;
- **Data on your interests, hobbies and needs** that you provide to us when communicating with SEB Lithuania employees or transfer to us when using SEB Lithuania services;
- **Audio-visual data**, such as video surveillance, video, audio recordings, when you visit SEB Lithuania units, call at customer service numbers, use remote advice and / or ATMs, intend to become SEB customer using remote access;
- **Data obtained to meet regulatory requirements**, such as data obtained from inquiries of notaries, bailiffs, law enforcement authorities, etc.

NB: If necessary due to the nature of the service provided by SEB Lithuania, such as life insurance, we collect personal health data with your consent. However, we do not collect other **specific categories of personal data** that reveal your racial or ethnic origin, political opinion, religious or philosophical beliefs or trade union membership, sexual life or sexual orientation, unless you or your contractors disclose such data by using our services, such as when paying for goods or services, or in similar cases.

We also collect data about people related to you, e. g.:

- Legal representatives (acting on a power of attorney or on any other basis);
- Payers and payees;
- Counterparties and participants;
- Ultimate beneficial owners (UBO);
- Persons entitled to be paid insurance benefit;
- Your debtors, creditors;
- Your family members;
- Heirs.

NB: If you provide us with details of persons associated with you, you should familiarize them with the present Policy.

We may also collect your personal data if you are related to our customers or persons, who intend to become our customers – legal entities, for example, if you are:

- Head of the company;
- Shareholder;
- Member of the Board or other collegial body;
- Ultimate beneficial owner (UBO);
- Representative of a company acting under a power of attorney.

For what purposes do we collect and use your personal data?

We collect and use your personal data, which you provide yourself, and which we obtain from other external sources, such as public or private registries or other third parties (external sources can be found in this Policy, chapter 'Where from do we obtain your personal data?'). We process your personal data for the following main purposes:

In order to identify you and authenticate your identity and to contact you, we collect your name, surname, personal identification number, date of birth, copy of your identity document, address, telephone number and other contact details.

In order to implement the requirements for the prevention of money laundering and terrorist financing and to determine whether we can establish / continue a business relationship with you, as well as to ensure that all requirements related to the application of sanctions are met, we collect / update the data relating to your job, current position, citizenship, data on whether you are a politically exposed person as well as other data necessary to ensure the implementation of the "Know Your Customer" principle.

In order to be able to advise you and assess your needs, we collect information about your family situation, education, your income, financial obligations, financial goals and plans, and other information that you provide to us during meetings, remote advice and / or conversations by phone with employees of SEB Lithuania.

In order to assess your creditworthiness and provide financing in accordance with the principles of responsible lending as well as to meet the requirements of our operational risk management and to manage your debts towards us, we collect data about your income, your education, your workplace, current position, on-job experience, available assets, your financial obligations, credit and payment history, your family, absence of adverse circumstances (debts, seizures, insolvency, etc.). In taking decisions about services provided under the Consumer Credit Act, we may be guided by automated data analysis which we perform on the basis of the above-indicated collected information. If you disagree with such an automated decision, at your request the decision will be reviewed and your creditworthiness will be assessed manually by our employee.

In order to provide you with other services and to properly fulfil our contractual obligations, as well as to fulfil our duties prescribed by law, we process the personal data provided by you (e.g. name, surname, telephone number, account number) and other information to the extent necessary for the provision of such services and for the fulfillment of obligations. Also, in order to ensure your participation in the loyalty programs of our partners when it comes to a payment card issued to you by SEB Lithuania, we use data about your transactions with us and the information we obtain from you when using our services.

In order to control our day-to-day operations and protect our legitimate interests, we may process such data as information about judicial or administrative proceedings in which you are involved, debts or other amounts payable by you to any third parties, your assets (cash, investments in financial instruments, etc.) and other information provided to us by relevant authorities, institutions or persons.

In order to provide payment services related to Application Programming Interface (API), we collect and use, in accordance with legal requirements and with your consent, data such as your account number with another account manager, currency, name, type, balance of account, and in the case of account information service, also a list of payment transactions in the selected accounts and details of the transactions, including reserved amounts, information on whether the account has a credit limit, etc. By providing these services, we may transfer your IP address, browser and its version information in relation to the devices you use to other payment service providers that manage your accounts.

In order to provide investment services that include the provision of investment advice and / or financial instruments portfolio management, we collect and use, in accordance with legal requirements, the data necessary to assess suitability and acceptability, such as your investor knowledge and experience in the area of investing related to specific types of investment services or financial instruments, the financial standing, including any potential loss, the objectives you pursue with investment services, including risk appetite.

In order to improve the quality of our services and to be closer to you. For this purpose, we perform automated analysis (profiling) of your personal data, including information about the services you have ordered from SEB Lithuania and their usage, also we analyze the history of your payment transactions. We collect and analyze these data of yours for internal purposes, such as data analysis or research to support the provision and improvement of our electronic platforms, the content and services. We collect and analyze these data from you with the aim to monitor and analyze trends, usage and performance of our products and services in order to understand which parts of our products and services are the most attractive to consumers and to improve our services. By analyzing your experience with our products and services, we gain a better understanding of what you need, thus making our business more efficient and useful.

In order to send general-type direct marketing offers as well as to ask for your opinion on the quality of our services and to invite you to participate in market research, we collect and use your name, surname, telephone number, e-mail address. **In order to provide you with tailored direct marketing offers (by phone, e-mail, mobile applications) that meet your needs**, in addition to the above data, we also collect and use your residential address, information about your usage of our services, payment transaction history, payment behaviour history, family information, professional information, information on the acquisition of property (including the acquisition, sale, etc. of your family property) as well as any other information that you provide to us during meetings or on electronic channels. For this purpose, we **perform automated analysis** (profiling) of your personal data.

If you disagree that your personal data are profiled and used for direct marketing purposes, you can withdraw your consent anytime upon informing us in any way convenient for you.

To ensure your property and our property security, we perform video surveillance and process your video data when you visit our bank or get advice remotely.

To identify you in compliance with regulatory requirements, where you are identified without your physical presence, we make video recordings and/or take photos and process your image/portrait data.

In order to prevent violations of legal acts as well as to protect you and your property from criminal acts (e.g. by misappropriating your data, identity), we collect and systematize information about possible misuse of SEB Lithuania services. For this purpose, we may also use contact information and security data of payment instruments as well as payment transaction data to protect transactions and communications on our remote networks.

In order to conclude and execute a life insurance contract, assess insurance risk and investigate insured events, we collect and provide to reinsurers, with your consent, data about your health, medical examinations and other medical data on life insurance services provided to you by other life insurance companies, data from law enforcement authorities related to the investigation of an insured event.

In order to communicate with you on social networks, i.e. Facebook, Youtube, LinkedIn, Instagram, we process the following personal data of yours: name, surname (name), information about communication in your SEB Lithuania account ("like", "follow", "comment", "share", etc.), photos (profile and / or marked SEB Lithuania), sent messages, information about the message (message receipt time, message content, message attachments, correspondence history, etc.), information about participation in SEB Lithuania events and (or) games (participation, non-participation, interest, compliance with the rules of the game, etc.), information about the assessment of SEB Lithuania (assessment score, feedback, etc.). These data are obtained directly from you (in your social network account) when you communicate with us through social networking tools such as "Send a Message" and / or visit our managed social network accounts. All of your above-mentioned personal data are used for mutual communication in public space, i.e. in social networks.

Personal data provided on social networks are processed jointly with the social network manager (e.g. on Facebook, Youtube, LinkedIn and / or Instagram platform), therefore, in order to obtain a wider access to information on the processing of personal data on social networks, we offer access to a particular social network manager's privacy policies.

What gives us the right to obtain and use your personal data?

We obtain and use your personal data under at least one of the following conditions:

- You intend to conclude or have concluded an agreement with SEB Lithuania;
- You have given your consent - when we send you direct marketing messages, when we publish your personal photos on the SEB Lithuania website;
- Processing of personal data is mandatory on the basis of legal acts - as provided by legal acts regulating the activities of financial market players and the services they provide;
- For the purpose of our legitimate interests, such as:
 - to improve the quality of our offerings, to ensure the consistency and sustainability of our activities, the comprehensiveness of the services provided to you and their conformance with your expectations as well as your maximum satisfaction with our services;
 - to bring and defend legal actions and take other lawful actions to prevent or reduce losses;
 - to systematically monitor and prevent illegal acts and regularly assess the risks associated with them (e.g. unauthorized use of payment cards or other payment instruments, etc. that we have issued to you); and
 - to fully assess a borrower's creditworthiness - when we collect personal data of a shareholder in a legal entity a legal entity.
- The processing of your data is necessary for the performance of a task carried out in the public interest - when we implement measures for the prevention of money laundering and terrorist financing.

Where from do we obtain your personal data?

We use your personal information that you provide to us when applying for our services that you are either using or intend to use in future. Also, we may obtain your personal data from other sources:

- Other financial institutions;
- The Bank of Lithuania, Ministry of Finance, Lithuanian Agricultural Advisory Service, Department of Statistics, Board of the State Social Security Fund, State Health Insurance Fund, National Paying Agency, State Enterprise Center of Registers, SE Regitra, law enforcement institutions, other registers and state institutions;
- UAB Creditinfo Lietuva;
- Insurance companies;
- Health care institutions, if you use insurance services;
- Natural persons, when they provide data of their spouses, children, other persons related by blood or marriage, co-debtors, sureties, guarantors, insurance beneficiaries, etc.;
- Natural or legal persons (property valuers, notaries, etc.) when they submit them in compliance with contractual or legal requirements (information in insurance contracts, property valuation reports, certificates, etc.);
- Legal entities, when you are a representative, employee, contractor, founder, shareholder, participant, owner, etc. of such legal entities;
- Partners or other legal entities using us to provide services to you.

We may collect your personal information by monitoring our technological tools and services, including e-mail correspondence sent to or from SEB Lithuania. Otherwise, we collect and generate information about you when you provide it to us, for example, by registering or providing feedback electronically. We can also obtain information about you from our suppliers.

To whom do we provide your personal information?

We provide your personal data in accordance with legal requirements. Your personal data may be transferred to:

- Other banks and financial institutions;
- Insurance, reinsurance companies and insurance intermediaries;
- Payment and other service providers involved in the execution of your transaction with us (for example, to execute a payment, personalize a payment card, etc.);
- Stock exchanges and other trading venues for financial instruments, brokerage firms, central depositories, distributors and / or managers of funds the units of which you purchase or transfer using our services, trade repositories and other economic entities involved in providing you, directly or indirectly, with our services related to investing in financial instruments;
- SEB Group companies, the list of which can be found on the website www.seb.lt, when it is necessary for financial accounting, audit, risk assessment, or when we use common information systems or hardware (servers) or required for the provision of services;
- UAB Creditinfo Lietuva;
- Bank of Lithuania, Ministry of Finance, Lithuanian Agricultural Advisory Service, Statistics Department, State Social Insurance Fund Board, State Health Insurance Fund, National Paying Agency, UAB Būsto paskolų draudimas, SE Deposit and Investment Insurance, SE Center of Registers, SE Regitra, notaries, law enforcement agencies, other registers and state institutions;
- State Tax Inspectorate with the aim to comply with tax laws, the Agreement between the Government of the Republic of Lithuania and the Government of the United States of America on the Improvement of Cross-Border Tax Compliance and on the Implementation of the Foreign Account Tax Compliance Act and other international commitments of the Republic of Lithuania in this area;
- Financial Crime Investigation Service, courts and other law enforcement authorities at their request or on our own initiative, if there is suspicion that criminal offense has been committed;
- Companies providing messaging, direct marketing, event organisation and related services;
- Companies that run or administer loyalty programs participated by SEB Lithuania, such as Mylimiausia Card;
- Service providers that provide payment instrument and personalized security data production services;
- Our professional advisors, auditors;
- Courts, arbitrators or other dispute resolution or law enforcement authorities, where they have the right to obtain such information in accordance with the procedure established by law;
- Other third parties as regards our sale of business, mergers, acquisitions or reorganization of our business, in whole or in part, or in connection with similar change in business (including, among other things, potential or existing business buyers and their advisers).

Also, to process personal data covered by this Policy, we use the following data processors, including without limitation: companies providing data centre, hosting, cloud, site administration and related services; document archiving companies; advertising, marketing companies; software design, supply, support and development companies; companies offering information technology infrastructure services; companies delivering communication services; companies rendering advisory services; companies analysing the Internet browsing or Internet activity.

We normally process and store your personal data within the European Union or the European Economic Area (EU / EEA), however, we may transfer your personal data outside the EU / EEA, for example, when necessary for the conclusion and performance of a contract or if you have consented to such transfer. We transfer your personal data outside the EU / Estonia, if at least one of the following measures has been implemented:

- The European Commission has recognized that the state to which the data are transferred ensures an adequate level of personal data protection;
- Data recipient in the United States is certified in accordance with the requirements of an EU-US agreement called the 'Privacy Shield';

- A contract has been concluded in accordance with standard conditions approved by the European Commission;
- Codes of conduct or other safeguards under the General Data Protection Regulation are complied with.

Important: Payment and other service providers involved in the execution of your transaction with us may be located or operating in a country that does not provide an adequate level of data protection (i.e. in a country that is not a party to the Agreement of the European Economic Area and is not included by the European Commission into the list of countries with an adequate level of data protection). We employ every means to ensure secure use of your personal data, however, there may be cases where we will not be able to ensure the recipient's compliance with the same requirements as in the European Union.

How long do we store your personal data?

We store your personal data for no longer than is necessary for the purposes, for which they were collected or for the period required by law, i.e.:

- The data collected in connection with the provision of services, including video data collected during a remote access advisory meeting or when identifying the person by remote access, we process for as long as you use our services, and retain for a further 10 years after you cease using our services;
- Recorded phone calls when you make a call to:
 - AB SEB bankas' Contact Centre, are stored for a further 10 years after the recording date;
 - AB SEB bankas' Mortgage Centre are stored for a further 10 years after the recording date;
 - AB SEB bankas' Financial Markets department, are stored for a further 7 years after the recording date;
 - AB SEB bankas' Private Banking Department, are stored for a further 10 years after the recording date;
- Video data of the Bank's premises are stored for a further 60 days;
- Data of persons related to legal entities, i.e. managers, representatives, shareholders, etc.), where such person does not have any personal agreements with SEB Lithuania, for a further 10 years since the end of business relationship with the legal entity;
- Data of potential customers (for whom an offer was provided, but no contract was concluded) are stored for 2 years from the date of the decision not to conclude a contract - taking into account the 2-year limitation period for filing a complaint to the State Data Protection Inspectorate;
- Data of a consent for marketing purposes - 3 years from the date of the consent;
- In the case of leasing service, the data of the asset seller, who does not conclude a service agreement with AB SEB bankas - 10 years after the end of the leasing agreement;
- Pension / insurance contract counterparty, who does not sign the contract directly, e.g. beneficiary in the case of inheritance - 10 years after the end of the contractual relationship;
- We process the personal data you have submitted on social networks Facebook, Youtube, LinkedIn, Instagram until the moment of revocation of your consent (i.e. deletion of the submitted data from the account), but not longer than until the deletion of the SEB Lithuania account. We note that personal data are processed only on the social network manager's platform, therefore, the exact terms and conditions for processing are determined by the platform manager. In the event of inadmissible communication (such as defamation, denigration of SEB Lithuania's repute, etc.), we may retain the communication as evidence for a reasonable period of time in order to protect our violated rights and / or legitimate interests (i.e. during the entire period of extrajudicial, pre-trial or legal proceedings).

NB: The terms and conditions of individual services, such as open banking, payment, etc., or of the legislation governing their provision, may provide for special retention periods for keeping personal data, which we will observe when storing your personal data. We make the information about the periods known by informing you of the terms and conditions for providing such services.

How secure is your personal information?

We employ a variety of security technologies and procedures to protect your personal information from unauthorized access, use or disclosure. Our suppliers are carefully selected, and we require them to use appropriate measures to protect your confidentiality and ensure your personal information security. However, the security of information transmission by e-mail or mobile communication may sometimes be uncertain for reasons beyond the control of SEB Lithuania, therefore, you should be careful when providing us with confidential information via electronic systems other than those used by SEB Lithuania.

What are your rights?

You have the following rights:

- the right to request that we give you access to your personal data;
- the right to require rectification of any incorrect, inaccurate or incomplete data;
- the right to restrict the processing of your personal data until, at your request, the lawfulness of their processing is verified;
- the right to require deletion of personal data, if this can be justified by one of the reasons indicated in the GDPR;
- the right to object to the processing of personal data for direct marketing purposes, including profiling, and when personal data are processed in our legitimate interests;
- the right to require transferring your personal data to another data controller or to provide them directly in a form convenient for you (applicable to personal data provided by you and processed by automated means on the basis of consent or on the basis of a relevant contract conclusion and execution);
- the right to withdraw your consent, without prejudice to the use of your personal data prior to the consent withdrawal;
- the right to submit a complaint to the State Data Protection Inspectorate (for more details, see www.vdai.lrv.lt), if you believe your personal data have been processed in violation of your rights / legitimate interests.

How will you exercise your rights?

We take every effort to support you in exercising your rights and to answer any questions you may have about the information contained in this Policy. You may submit a request regarding the exercise of the above-indicated rights as well as any complaint, notification or request (hereinafter - the 'request') to the Data Protection Officer of SEB Lithuania by e-mail: data@ap.lt; by post: Konstitucijos ave. 24, LT-08105, Vilnius; or by visiting your nearest customer service unit in Lithuania.

You may submit your request in the following ways:

- by sending a message on the Internet Bank ('Messages and e-invoices' → 'Write message' → 'Subject. Other');
- by visiting your nearest unit of AB SEB bankas (remember to bear your passport or ID card); or
- by emailing your request at: duomenuapsauga@seb.lt or info@seb.lt; or by post: AB SEB bankas, Konstitucijos ave. 24, LT-08105, Vilnius.

If for the purpose of drafting a reply it is necessary to provide confidential information or information that constitutes the bank secrecy, we may ask you to confirm your identity (to write a message on the Internet Bank or to present your passport or identity card at our bank's sub-branch).

We will provide a response to your request no later than within 30 (thirty) calendar days since the date of the receipt of your request. In exceptional circumstances requiring additional time, we will, upon notifying you, have the right to extend the deadline for the submission of the requested data or other requirements specified in your application up to 60 (sixty) calendar days since the date of your request.

What are the principles of personal data protection that we comply with?

We collect and use the personal data you entrust to us as well as the personal data obtained from other sources in compliance with the following principles:

- Your personal data are processed in a lawful, fair and transparent way (principle of legality, fairness and transparency);
- Your personal data are collected for specified, explicit and legitimate purposes and are not further processed in a way incompatible with said purposes (purpose limitation principle);
- Your personal data are adequate, relevant and limited to the purposes for which they are processed (principle of data minimisation);
- Personal data processed are accurate and, where necessary, kept up to date (principle of accuracy);
- Your personal data are kept in a form that allows identification of a person for no longer than is necessary for the purposes for which your personal data are processed (principle of limitation of the retention period);
- Your personal data are processed in such a way that application of adequate technical or organizational measures would ensure appropriate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage (principle of integrity and confidentiality).

Our commitments

In the process of collecting and using the personal data you entrust to us as well as the personal data obtained from other sources, we undertake to:

- Process your personal data only for clearly defined and legitimate purposes;
- Refrain from processing your personal data for purposes other than those specified in this Policy, except as provided by law;
- Process your personal data in a legitimate, accurate, transparent and fair way to ensure the accuracy, identity and security of the personal data being processed;
- Ensure that superfluous personal data are not processed;
- Process your personal data not longer than it is necessary for the purposes for which personal data are processed;
- Be responsible for compliance with the principles set out in the Policy and be able to demonstrate compliance with them;
- Perform other duties arising out of relevant legislative acts.

Validity and modifications to the privacy policy

The present Policy entered into force on 25 May 2018 and was updated on 23 November 2020. It may be modified in line with the developments in legislation and our operations. We will notify about any modifications on our website www.seb.it.