



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



SEB companies' in Lithuania policy on the processing of personal data

Our aim is to provide you with detailed information on processing of your personal data irrespective of whether you communicate with us by way of personal meetings, electronically (e.g., via our Internet Bank, mobile apps or websites) or in any other way you prefer. The present Policy applies to you, if your data are processed by an SEB company in Lithuania (AB SEB bankas, UAB "SEB gyvybės draudimas", UAB "SEB Investicijų valdymas", etc.)

We care about the protection and privacy of your personal data.

The purpose of SEB companies' in Lithuania Policy on Processing of Personal Data (hereinafter the '**Policy**') is to inform you about ways in which the SEB Group collects, uses and shares your personal data provided to us or collected by us in any other manner. The aim of this is to ensure fair and transparent collection and use of your information.

Devote some of your time to look through the Policy and in case of any query, do not hesitate to contact us in one of the below indicated ways.

Going forward there may be changes in our Policy, therefore, we encourage you to periodically review it.

Your personal data are processed in line with the General Data Protection Regulation (EU) 2016/679 (hereinafter the '**GDPR**'), Law on the Protection of Personal Data as well as other legislation.

Personal Data means any information relating to you which you yourself have provided or which we obtain from other sources and which enable to identify you. It may be your name, surname, personal ID number, contact information, information relating to agreements you have concluded with AB SEB bankas or another company of SEB Lithuania and their performance history, information on usage of Internet Bank services as well as any other services provided by SEB Lithuania, bank account information (account number, executed transactions, balance of an account, etc.) telephone records when you call at customer service numbers, imaging data recorded by video surveillance equipment, etc.

Data Subject (you) means a natural person (customer, his or her representative, family member, guarantor, collateral giver, etc.) whose personal data we obtain and use further.

SEB companies in Lithuania (hereinafter – SEB Lithuania) means any legal entity which is a member of the SEB Group and whose registered office is in Lithuania and who acts as a controller of personal data. The list of SEB Lithuania companies and their contact data are announced at seb.lt. Within the context of the present Policy, SEB Lithuania may mean: AB SEB bankas, UAB "SEB investicijų valdymas", UAB "SEB gyvybės draudimas" or all these companies together.

SEB Group means Skandinaviska Enskilda Banken, AB (publ.), a company established in Sweden as well as legal entities with all of their branches owned by it either directly or indirectly.

For the purpose of this Policy, the terms used in the GDPR and other regulatory acts shall apply.

Data protection officer's contact information

In the event of any issue related to data processing please contact SEB Lithuania's data protection officer by, e-mail duomenuapsauga@seb.lt, by phone +370 5 268 2800 or by post at the following address: Gedimino pr. 12, LT-01103 Vilnius.

What is the data related to you that we collect?

We collect the following data related to you:

- **basic personal data**, such as name, surname personal ID number, date of birth, telephone number, e-mail, address;
- **identification data**, such as personal document data, IP address, Internet Bank log-in data and other browsing information, including data on when and from where such log-in to our Internet Bank occurred and our website as well as other electronic platforms;
- **data on your financial literacy**, such as education, knowledge and experience in investing;
- **data on your transactions within SEB Lithuania**, depending on what services are provided to you by SEB Lithuania, e.g. bank account number, deposits, payment orders, other payment transactions, payment instruments as well as actions performed using them, cash depositing and withdrawals, etc.;
- **financial data**, such as origin of funds, registered tax residence country, accounts, payment documents, financial obligations, payments behaviour, assets, asset types and value, credit history and creditworthiness, your expenses and incomes, financial goals (e.g., how much would you like to save and for what objectives);
- **economic data**, such as your workplace, your economic/ commercial activities (farmer activities, self-employed, etc.), stability of your incomes and information on other sources of your funds;
- **socio-demographic data**, such as family status and family data;
- **data on your behaviour at the Internet and hobbies**, which we determine from your behaviour at our website, Internet Bank or using other electronic means;
- **data on your interests, hobbies and needs** that you have provided to us when communicating with SEB Lithuania employees or communicated to us through SEB Lithuania services;
- **audio- and video-data**, such as visual observation, video and audio records when you visit our bank units or contact our bank employees.

NB: if it is necessarily required with regard to the nature of a service provided by SEB Lithuania, e.g., life insurance, we collect personal data concerning health. However, we do not collect other **special categories of personal data** that reveal your racial or ethnic origin, political opinions, or philosophical beliefs or trade-union membership or data concerning sex life or sexual orientation, unless you or your contracting parties disclose through our services, or in any other similar cases.

Also, we collect data on persons related to you, e.g.:

- legal representatives (acting with relevant authorisation or on any other basis);
- payers and payees;
- contracting parties and contract participants;
- your funds sources;
- ultimate beneficial owners (UBO);
- your debt holders, creditors;
- your family members.

Important: if you provide us data of other persons related to you, you should obtain their consent and inform them about this Policy.

Also, we may collect your personal data, if you are related to our customers – legal entities, for instance, if you are:

- general manager of a company;
- shareholder;
- member of the management board or any other management body;
- representative of a company acting with relevant authorisation.

What are our purposes for collecting and using your personal data?

We collect and use your personal data that you provide to us yourself or that we obtain from other sources. We process your personal data with the following main purposes:

To be able to identify you and get in touch with you, we collect your name, surname, personal ID code, date of birth, personal ID document copy, address, telephone number and other contact data.

In order to implement the anti-money laundering requirements and to assess your eligibility to become our customer, we collect data on your employer, your position held, citizenship, also, data on whether you are a politically exposed person.

To provide you with a consultation and to assess your needs, we collect information on your marital status, education, your incomes, existing financial obligations, financial goals and plans, as well as other information that yes renkame informaciją apie Jūsų šeiminių padėtį, išsilavinimą, jūsų pajamas, turimus finansinius įsipareigojimus, finansinius tikslus bei planus, bei kitą informaciją, kurią jums pateikiate susitikimų ar nuotolinių konsultacijų metu.

To assess your creditworthiness and to be able to provide you with financing in accordance with the principles of responsible lending, to be compliant with the requirements related to our operational risk management, also, to be able to control your debt held towards our bank, we collect data on your income, assets, your financial liabilities, credit history, your family, costs incurred. For taking decisions on services provided in accordance with the Law on Consumer Credit, we can build on automated data analysis, which we undertake based on information related to your income, financial liabilities held as well as considering other circumstances which, according to our assessment, are significant. If you disagree with a decision taken by automated means, the decision, at your request, will be revised and your solvency assessment by non-automated means will be undertaken by our employee.

To be able to advise you, to render our services to you and duly perform our contractual obligations and exercise the responsibilities required under relevant legislation, also in order to make sure your participation in loyalty programmes when they are connected to payment card SEB Lithuania has provided to you, we use data on contracts and other transactions you have concluded with us and information we receive when you use our services. In some cases for this purpose, we undertake an **automated analysis** of your habits in using services (e.g. for us to be able to properly inform you of any interferences in the provision of the service, to be able to present improvements in the services or new similar services or products, etc.). If you have any queries or if you are not satisfied with the performance of our obligations towards you, please inform us about it immediately.

To be able to control our daily transactions and protect our legitimate interests, aiming, among other things, to:

- comply with the requirements of applicable legislation, rules, regulations, manuals, codes, professional rules and provisions;
- comply with the requirements of local and foreign institutions, courts, law enforcement institutions and satisfy their requests, also, to meet the standards for court proceedings or any other requirements related to settlement of disputes; and
- to assess whether any action should be taken against consumers that violate our rules or engage in any illegal activities or such that affect other persons or their property.

We may process information about court and administrative procedures you participate in, debts or other types of payable amounts for third parties, your assets (funds, investments, financial tools, and alike) and other information we obtain for the above mentioned reasons.

To improve our service quality and become SEB Lithuania that is closer to you. For this purpose, we undertake automated analysis of your personal data, including information about your ordered SEB Lithuania services and their usage, also, we analyse your purchase history, i.e. what goods and services you have purchased through our services. We collect and analyse these data for the content of our internal purposes, e.g., audit, data analysis and research to support and improve our electronic platforms. We collect and analyse your said data to monitor and analyse our product and service trends, their usage and activities with the aim to understand which parts of our products and services are of greatest interest to consumers and improve our services, electronic platforms as well as their content.

We use your said personal information as a support in managing, improving and developing our services and in minimising the disruptions in the provision of the services we offer. Also, it enables us to update and facilitate our communication maximising its adaptation according to your personal needs. Analysis of your experience related to the usage of our products and services allows us to get a more in-depth understanding of your needs, thus rendering our activities more effective and efficient.

To be able to send general type direct marketing offerings, we collect and use your name, surname, telephone communication number, electronic mail address. **To provide direct marketing offerings (by phone, electronic mail, mobile apps) that answer your needs** we, besides the above indicated data, also collect and use your place of residence address, information on the use of our services, history of your payment transactions, payment behaviour history, information about family, professional information, information on your property acquisition (including acquisition and sales of your family property, etc.) as well as other information provided by you during the meetings with us or by electronic means. For this purpose, we undertake **automated analysis** of your ordered personal data and their usage, your behaviour at our website and electronic platforms, also, your purchase history, i.e. what goods and services you have purchased through our services. **If you disagree** that your personal data are used for the purpose of direct marketing, please inform us immediately about it.

To be able to communicate with us, among other things, to:

- reply to your queries and requests regarding services and to receive your feed-back;
- send important messages, e.g. regarding any amendment to the General Service Rules, the present Policy or any other documents; and
- send technical reports, updates, security alerts, support and administrative messages;
- we process your contact data as well as the content of incoming and outgoing messages.

To get your feed-back regarding our service quality and to invite you to take part in our market research, we collect and use your name, surname, electronic mail address, telephone communication number, data on your age, gender and language. If you disagree that your personal data are used for this purpose, please inform us immediately about it.

To ensure remote provision of services, we record telephone conversations or any other communication between you and us. Foreign this purpose, we also store telephone communication number, IP address as well as other your identity data, content, duration of a conversation as well as other technical data.

To ensure the security of your and our property, we perform video surveillance and process your imaging data from your visit at our bank.

To implement the prevention and detection of legislation breaches and to protect you and your property from law infringement acts (e.g., misappropriation of your data, identity), we collect and systematise information on possible misuse of SEB Lithuania's services. For this purpose we can also use contact information and safeguards of the means of payment seeking to safeguard transactions and communication via our remote networks.

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

We access and use your personal data, if any of the following applies:

- you intend to conclude or have concluded an agreement with SEB Lithuania;
- you have given your consent;
- processing of personal data is possible on the basis of legislative acts;
- for the purposes of our legitimate interests, such as, e.g.:
 - to improve our service quality, to ensure our operational consistency and sustainability, comprehensiveness of our services adapting them to your expectations to achieve maximum customer satisfaction;
 - to bring an action or defend any legal claims and carry out other legal actions with the aim to avoid or minimise losses;
 - to systematically monitor and prevent illegal activities a perform continuous assessment of relevant risks (e.g., unauthorised use of payment cards or any other means of payment issued to you by our bank, etc.).

NB: if you fail to provide us with your personal data that are necessary for the conclusion and/or performance of an agreement or provision whereof is required by law or under the agreement, we will be unable to provide our services to you.

Where From Do We Get Your Personal Data?

We use personal data, which you provide to us when you seek our services and use them, when you fill out client information forms, submit requests or file claims, also the ones we document at SEB Lithuania's website, Internet Bank, by video surveillance equipment or telephone records, as indicated above.

Also, we may collect your personal data from other sources, such as:

- other financial institutions;
- Bank of Lithuania, Ministry of Finance, Lithuanian Agricultural Advisory Service, Department of Statistics, State Social Insurance Fund Board, National Health Insurance Fund, National Paying Agency, State Enterprise Centre of Registers, State Enterprise Regitra, law enforcement institutions, other registers and state institutions;
- creditinfo Lietuva, UAB;
- insurance companies;
- health care institutions, if you are provided with insurance services;
- natural persons, when they provide data of their spouses, children, other relatives by blood or marriage, guarantors, go-borrowers, collateral providers, etc.;
- documents that are dedicated for us and received from natural or legal persons when they execute contractual obligations towards us or obligations arising from legislation (information from insurance contracts, property evaluation forms, reports, etc.);
- legal entities, where you are a representative, employee, counterparty, shareholder, participant, owner, etc. of a relevant legal entity;
- partners or other legal entities, who provide their services with our help.

We can collect your personal information by monitoring your technological tools and services, among other things, your communication by e-mail from or to SEB Lithuania. Another instance is when we collect your information and generate, where you provide us with it, for instance, by identifying yourself or by providing a comment by electronic means. Also, we can obtain your information from our suppliers.

We can combine your information obtained from various sourced.

To whom do we provide your personal data?

We provide your personal data in compliance with relevant legal requirements. Your data may be transmitted to:

- other banks and financial institutions;
- providers of payment and other services involved in the performance of a transaction executed with you (e.g., with the aim to make payment, personalise a payment card, etc.);
- companies which provide Insurance and reinsurance services, where such services are provided by us as intermediary or are related to the services that we provide to you;
- stock exchanges and other trading venues for financial instruments, brokerage firms, central depositories, funds you acquire or distribute through our services, distributors and / or managers, trade repositories and other entities involved in providing us, directly or indirectly, services related to investment in financial instruments;
- SEB Group companies, a list of which is available at www.seb.lt, it is necessarily required for financial records, audit, risk assessment or where we use joint information systems or common hardware (servers) or is necessary for provision of services;
- Creditinfo Lietuva, UAB;
- the Bank of Lithuania, Ministry of Finance, Lithuanian Agriculture Advisory Service, Department of Statistics, State Social Security Fund Board, National Health Insurance Fund, National Paying Agency, Būsto paskolų draudimas UAB, State enterprise Deposit and investment insurance, State Enterprise Centre of Registers, State Enterprise REGITRA, notaries public, law enforcement institutions, other registers and state institutions;
- State Tax Inspectorate, with the aim to implement 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 the Foreign Account Tax Compliance Act as well as other international commitments in this area;
- Financial Crime Investigation Service, courts and other law enforcement institutions according to their relevant request given or at our own initiative, if any suspicion arises of a committed offence;
- companies providing messaging, direct marketing, event organisation and related services;
- our professional advisers, auditors;
- companies that execute or administer loyalty programs;
- service providers that provide payment or security means' personalization services;
- courts, tribunals, arbiters or any other dispute settlement authorities;
- other third parties to the extent it relates to our business divestment, mergers, acquisitions or reorganisation of business in whole or in part or in the process of the implementation of similar business changes (including, among other things, potential or existing business purchasers and their advisers).

For the purpose of processing the data referred to in the present Policy, we will also attract the following processors: companies providing data centre, hosting, cloud, website operation and related services; document archiving service companies; companies providing promotion, marketing services; software design, supply, support and development companies; companies providers of information technology infrastructure services; communication service, advisory companies; companies providing web browsing and online activities analysis and relevant services.

We, for the purpose of processing of personal data referred to in the present Policy, may attract other service providers. We seek to ensure that service providers are compliant with the requirements of the GDPR, laws, the present Policy as well as other requirements of legal acts. The relationship between us, as a data controller, and a definite data processor, other than in cases where such relationship is provided by laws or any other legislation, is set in written contract or in terms and conditions stated in writing.

Usually we process and store your personal data in the territory of the European Union or the European Union Economic Area (EU/EEA), however, we can transfer your personal data outside the EU / EEA, for instance, where it is necessary for the conclusion and performance of an agreement, if you have given your consent for such transfer. We

transfer personal data outside the EU / EEA, if at least one of the following instruments is implemented:

- the European Commission has recognised that the state ensures a sufficient level of personal data protection;
- recipient in the United States of America is certified in line with the requirements of the EU-US agreement – the so-called 'privacy shield';
- there is an agreement in line with the standard terms and conditions approved by the European Commission,
- Codes of conduct or other security measures in line with the GDPR are applied.

NB: providers of payment and other services participating in the performance of the contract concluded with us may be established or operate in a country, which does not ensure an appropriate level of data protection (i.e., in a country, in which no appropriate level of data protection is ensured (i. e. in a country, which has not joined the European Economic Area Agreement and has not been included by the European Commission in the list of countries with sufficient level of data protection). We take all measures in order that your data are used in a secure way, however, there may be cases where we will not be able to ensure that the recipient observes the same requirements as in the European Union.

How Long Do We Store Are Your Data?

We store your data no longer than it is required for the purposes for which they have been collected or for a period as provided by legislation, e.g.:

- we process data collected from rendering services till you continue using our services and store for a further 10-year period after you cease using them;
- we store video-records for a 60 days' period;
- to the extent it is necessary for document archiving purposes in compliance with the legal deadlines.

What is the level of your personal information security?

We use various security ensuring technologies and procedures with the aim to protect your personal information from illegal access, usage or disclosure. Our suppliers are carefully selected, we require that they use appropriate measures that can secure your confidentiality and ensure your personal data security. Nevertheless, the security of information transfer via email or by mobile communication in some cases cannot be ensured for reasons not dependent on SEB Lithuania, therefore you should take due case when providing confidential information to us by other than our electronic systems.

What are your rights?

You have the following rights:

- the right to request that we provide you access to your personal data;
- the right to request rectification of incorrect, inaccurate or incomplete data;
- the right to limit the processing of your personal data until, at your request, the lawfulness of your personal data processing is checked;
- the right to request erasure of personal data;
- the right to disagree with personal data processing for direct marketing purposes, including profiling, and when personal data are processed aiming at our legitimate interests;

- the right to request to transfer your personal data to another controller or provide directly in a format that is convenient for you (applicable to the personal data, which you have provided yourself and which are processed by automated means on consent basis or on agreement conclusion and performance basis);
- the right to withdraw your consent without any impact on the use of your personal data that was performed before the withdrawal of the consent;
- the right to lodge a complaint to the State Data Protection Inspectorate (more information at: www.ada.lt).

How will you exercise your rights?

We take every effort for the implementation of your rights and for answering any and all questions that arise to you regarding the present Policy and matters envisaged in it. You may lodge a request regarding the exercise of the above-indicated rights as well as any complaints, notices or requests (hereinafter the 'Request') to SEB Lithuania Data Protection Officer by e-mail at duomenuapsauga@seb.lt, at the postal address Gedimino pr. 12, LT-01103 Vilnius, or at your nearest customer service unit.

We will reply to your Request within a period of not more than 30 (thirty) calendar days since the day of receipt of the Request. In exceptional circumstances, which require additional time, we will, by giving you a relevant notice, have the right to extend the deadline for the submission of the requested data or for the consideration of claims set out in the Request up to 60 (sixty) calendar days after the day of your referral.

We will refuse to satisfy your Request by giving a substantiated response in case any circumstances set out in the GDPR or other legislation are determined upon giving you a relevant written notice.

What are the personal data protection principles that we observe?

The principles we observe when collecting and using your personal data entrusted to us as well as personal data obtained from other sources are as follows:

- your personal data are processed in a legitimate, fair and transparent manner (the principle of legality, fairness and transparency);
- your personal data are collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes (principle of purpose limitation);
- your personal data are adequate, relevant and only such that are required in relation to the purposes for which they are processed (principle of data minimisation);
- processed personal data are accurate and, where necessary, kept up to date (principle of accuracy);
- your personal data are kept in a form which permits identification of data subjects for no longer than it is necessary in view of the purposes for which the data are processed (principle of retention limitation);
- your personal data are processed in such a way that application of relevant technical or organisational measures would ensure adequate personal data security, including protection from unauthorised data processing or unlawful data processing and from accidental loss, destruction or damage (integrity and confidentiality principle).

Our undertakings

In the process of collecting and using your personal data entrusted to us as well as those obtained from other sources, we do undertake as follows:

- to process your personal data for explicit and legitimate purposes only;
- to refrain from processing your personal data for purposes other than those stated in the present Policy, unless

otherwise laid down by relevant legislation;

- to process your personal data lawfully, accurately, in a transparent manner and so that accuracy, identity and security of the processed personal data is ensured;
- to ensure that superfluous personal data are not processed;
- to process your personal data no longer than it is necessary for the purposes for which personal data are processed;
- be responsible for the observance of the principles laid down in the present Policy and be able to prove their observance;
- to perform other duties arising from the legislation.

Privacy policy expiry and amendments

The present Policy shall take effect on 25 May 2018. It may be amended within the limits of changes in the legislation and in our activities. We will notify about changes at our website www.seb.lt as well as by other means.

