

Privacy policy of Spar Nord Bank A/S

The data controller is Spar Nord Bank A/S (in the following referred to as the Bank)

Collection and processing of personal data

The Bank collects and processes information on existing and prospective customers for use in the supply of financial services of any kind, including payments, customer advice, customer service, customer administration, credit assessment, marketing and compliance with statutory requirements.

In accordance with the Danish Anti-Money Laundering Act, the Bank collects information about you, including your name, address and civil registration (CPR) no. The information must be documented by a photocopy of your passport or driver's license and health card. In addition, the Bank regularly collects information about the purpose and intended scope of the customer relationship. The information forms the basis of the Bank's knowledge about you as a customer and is used in the Bank's ongoing monitoring of the customer relationship. If you use credit or payment cards, online banking or other payment services, etc., the Bank will collect information from shops, banks and other places. The purpose is to be able to effect payment, prepare statements of account, payment overviews and the like.

The Bank collects information from The Danish Central Office of Civil Registration and other publicly available sources and registers. For credit assessment purposes, the Bank will investigate whether credit information and warning registers have registered information about you. The Bank updates its information on an ongoing basis.

The Bank receives information about you from collaboration partners, including other banks if you have given your consent thereto, or such disclosure is otherwise authorised by law.

The Bank will retain your information as long as necessary in order to serve the purpose for which it was collected, processed and retained.

Pursuant to the Danish Anti-Money Laundering Act, information, documents and registration records must be retained for at least five years after the business relationship ends or after completion of the individual transaction.

The Bank uses cookies and similar technologies to provide the best service and deliver targeted products and services. **More information is available on www.sparnord.dk/cookies.**

Basis of processing personal data

Customers of the Bank are obliged to provide the Bank with specific information to comply with legislation or the contractual relationship.

The legal basis of the Bank's processing is financial regulation and other legislation, including

- The Danish Anti-Money Laundering Act (*hvidvaskloven*)
- The Danish Tax Control Act (*skattekontrolloven*)
- The Danish Bookkeeping Act (*bogføringsloven*)
- The Danish Credit Agreements Act (*Kreditaftaleloven*)
- The Danish Payments Act (*Betalingsloven*)
- The Danish Data Protection Act (*databeskyttelsesloven*)

Furthermore, your information may be processed if such processing is necessary because of an agreement you have entered into or are considering entering into with the Bank, or if you have given your consent in accordance with Article 6(1) (a) and (b) of the General Data Protection Regulation (GDPR), or if one of the other processing rules of Article 6(1) and Article 9 of the GDPR applies.

The Bank will also process your information when this is necessary to pursue a legitimate interest to the Bank. Such interests could be the prevention of abuse and loss, for use in strengthening IT and payment security and for direct marketing purposes.

Disclosure and transfer of personal data

In order to honour agreements with you, e.g. if you have asked us to transfer an amount to others, the Bank will disclose such data about you as is necessary to identify you and fulfil the agreement.

The Bank will also disclose information about you to public authorities to the extent the Bank is obliged to do so pursuant to legislation, including the Danish Money Laundering Secretariat of the Public Prosecution for Serious Economic and International Crimes ("SØIK") pursuant to the Danish Anti-Money Laundering Act, SKAT pursuant to the Danish Tax Control Act, and Nationalbanken (the Danish central bank) for statistical purposes among other things.

The transfer of money to and from other countries is made via SWIFT, which is a global collaboration between financial enterprises. Under US legislation, SWIFT must disclose information to the US authorities on suspicion of financing of crime or terrorism. Such information may therefore be disclosed to the US authorities.

In addition, subject to your consent or where permitted by legislation, information will be disclosed to external collaboration partners, including social media, correspondent banks and other banks.

If you fail to meet your commitments towards the Bank, the Bank may report you to credit information agencies and/or warning registers according to applicable rules.

In connection with IT development, hosting and support, the Bank transfers personal data to data processors, including data processors in third countries outside the EU and the EEA. Detailed information about countries in which processing takes place is available on the Bank's website www.sparnord.dk/persondata. The Bank uses a number of legal mechanisms, including standard contracts approved by the European Commission or Danish Data Protection Agency to ensure that your rights are safeguarded and that the level of protection is maintained.

Access to the Bank's processing of data

You can obtain access to the information the Bank processes about you in its capacity as bank, where it comes from and what the Bank uses it for. You can also obtain information about for how long the Bank stores your data and about who receives data about you, to the extent that the Bank discloses data in Denmark and abroad. Your right of access may, however, be restricted by legislation, protection of other persons' privacy and consideration for our business and practices. The Bank's know-how, business secrets as well as internal assessments and material may also be exempt from the right of access.

Profiling and automated decision-making

Using automated processing and profiling of customer data, the Bank prepares big data analyses in accordance with Article 22 of the GDPR. The profiling is used to personalise the Bank's websites, develop more user-friendly services and tailor direct marketing towards the Bank's customers.

You may obtain access to the consequences of the processing, and you may object to the Bank's use of your personal data for direct marketing purposes.

The Bank's branch Sparxpres makes automated decisions in accordance with Article 22. You have the opportunity to ask for a manual processing of such decisions by contacting info@sparxpres.dk.

Rectification or erasure of the Bank's data

If the data is incorrect, incomplete or irrelevant, you are entitled to have the data rectified or erased subject to the restrictions that follow from legislation and the applicable legal basis.

Restriction of processing

If you believe that the data the Bank has registered about you is incorrect, or if you have objected to the processing of the data pursuant to Article 21 of the GDPR, including processing with a view to direct marketing, you may demand that the Bank restricts the processing of these data to storage. Processing will only be restricted to storage until the correctness of the data can be established, or it can be verified whether the Bank's legitimate interests outweigh your interests.

If you are entitled to have the data the Bank has registered about you erased, you may instead request the Bank to restrict the use of these data to storage. If the Bank needs to use the data it has registered about you solely to exercise a legal claim, you may also demand that other use of these data be restricted to storage. The Bank may, however, be entitled to effect other processing if required to exercise a legal claim or if you have granted your consent thereto.

Withdrawal of consent

You may withdraw your consent to disclose data that requires your consent at any given time.

You may withdraw your consent by sending an e-mail to gdpradm@sparnord.dk.

Data portability

If the Bank processes data based on your consent or as a result of an agreement, and the data processing is automated, you have a right to receive a copy of the data you have provided in an electronic format.

Complaints about the Bank's processing of data

If you are dissatisfied with our processing of your personal data, you may file a complaint to the Danish Data Protection Agency, Borgergade 28, 5., DK-1300 Copenhagen K, or dt@datatilsynet.dk.

Amendments to privacy policy

This privacy policy may be amended without notice if the amendment is to the customers' benefit.

The Bank may amend the privacy policy at one month's notice if the amendment is not to the customers' benefit. Information about such amendments will be made through notification in the Bank's online banking services or mobile banking services, on the Bank's website and by advertisement in the daily press.

Contact details of data controller and data protection officer

Data controller:
Spar Nord Bank A/S
Skelagervej 15
P.O. Box 162
DK-9100 Aalborg, Denmark
Company reg. (CVR) no. 13738584
Phone: +45 96 34 40 00
E-mail: sparnord@sparnord.dk

Data protection officer:

[E-mail: databeskyttelse@sparnord.dk](mailto:databeskyttelse@sparnord.dk)
Phone: +45 96 34 43 20
Address: Skelagervej 15, P.O. Box 162, DK-9100
Aalborg, Denmark attn. Data protection officer

Other details about the Bank's processing of personal data

Privacy and confidentiality policy on terms and conditions for processing of personal data in the "Mobilbanken" app.