

# Danske Bank International Privacy Notice

## INTRODUCTION

Danske Bank International S.A. is a financial institution that offers financial advice and services to its customers.

*As part of our business, we register and use information about our customers, their representatives and our other business relations.*

We protect your data and privacy by taking all relevant measures in accordance with applicable legislation.

This privacy notice sets out the basis for how Danske Bank International looks after your personal data and the privacy rights you are granted by law.

## WHY DO WE REGISTER AND USE YOUR PERSONAL DATA?

We register and use data about you to offer you the best advice and solutions, keep your finances safe, fulfil agreements with you, and comply with legal requirements that apply to.

This means that we register and use personal data when

- you make or you are considering making an agreement with us for a service or product
- you have granted us consent to use your personal data for a specific purpose
- it is our legal duty
- it is necessary to pursue a legitimate interest of Danske Bank International. For example, this may be to prevent abuse and loss, to strengthen IT and payment security or/and for direct marketing purposes

## WHAT PERSONAL DATA DO WE REGISTER AND USE?

Depending on the services or products you have ordered or are interested in, we register and use different kinds of personal data, including

- basic personal data, e.g. your name, contact information and national ID
- financial information, e.g. income, debt or credit rating
- information about your education, profession or work
- information about your family and household
- your documentary data, e.g. identification document, driver's license, birth certificate
- details about the services and products we provide to you, how you use them and your preferences towards them

### Sensitive data

We register sensitive data only when we need it to advise you on or providing you a product or service. We will seek your explicit consent to register sensitive personal data, unless we are permitted to register sensitive data without your consent by law, e.g. when exercising our legal claims. Sensitive personal data we may register includes

- information about your health and your genetic background, e.g. inherited health qualities, and bio-metric data
- information about your religious or philosophical beliefs
- trade union membership information

We may also register other personal data if needed to provide you with specific products or services or if we are required by law to do so.

Our ability to provide you the best advice and solutions very much depends on how well we know you. Consequently, it is important that the information you give us is correct and accurate and that you keep us updated on any changes.

### WHEN AND HOW DO WE REGISTER AND USE YOUR PERSONAL DATA?

We register and use personal data for the provision of financial services and products, including

- payment services
- accounts
- loans and credits
- digital banking solutions
- investment services and advice

We also register and use data for other activities related to the provision of certain services and products, including

- customer care, advice and administration
- credit assessment
- developing and managing our products, services and business
- marketing of our services and products
- setting fees and prices for our services and products
- identifying and verifying our customers
- risk management
- recovering outstanding debt
- protecting you and Danske Bank Group against fraud
- complying with legal requirements

We collect the information directly from you or by observing your actions, for example when

- you fill out applications and other forms for ordering services and products
- you submit specific documents to us
- you call us by phone. We record our telephone conversations. If we talk with you about investment services, we are obliged to record and store our telephone conversation
- you use our website, mobile applications, products and services
- you participate in our customer surveys or promotions organised by us

We keep your data only for as long as it is needed for the purpose for which your data were registered and used.

In accordance with the anti-money-laundering legislation, we store data, documents and records for at least five years after the termination of the business connection or the execution of the individual transaction.

## PERSONAL DATA FOR LEGAL ENTITIES

The information in this privacy notice is also relevant to persons within your entity for whom we have registered data about as part of our business relation with you. Such persons may be your employee, director, board member, member of partnership, your guarantor, owner, beneficial owner, representative or other third parties associated with your entity.

Usually, we process this personal data in order to

- handle our contractual relationship with you in the most efficient way, e.g. ordering and administering services through your authorised signatories and users, or communicating through your contact persons
- provide the persons associated with your entity with the services and products that are relevant for them because of your relationship with us, e.g. issuing corporate cards for your employees
- meet our compliance obligations, e.g. anti-money laundering requirements to register personal data related to the management and beneficial owners of your company

We only register and use personal data of persons associated with your entity for other purposes than mentioned above, if we have clear legitimate interest to do so, or if the associated persons consented to the use of personal data for that specific purpose.

## PERSONAL DATA FOR SOLE TRADERS

The information provided in this privacy notice is also relevant if you are a sole trader, sole proprietor of an enterprise or sole practitioner and where there is no legal distinction between you and your business. The reason for this is that your business data can also be treated as personal data.

## THIRD PARTIES AND YOUR PERSONAL DATA

### Personal data from third parties

We register and use data from third parties, for instance

- Shops, banks, payment and service providers when you use your credit or payment cards, or other payment services. We register and use the data to execute payments and prepare account statements, payment summaries and the like.
- Public authorities and publicly accessible sources and registers. We register and use the data, for example to check accuracy of the data.
- Entities of Danske Bank Group, credit rating agencies and warning registers. We register and use the data to perform credit assessments. We update the data regularly.
- Entities of Danske Bank Group. We register and use data from their notifications to relevant public authorities in accordance with anti-money-laundering legislation, if we receive copies of such notifications.
- Entities of the Danske Bank Group and business partners (including correspondent banks and other banks) if we have your consent or statutory provisions allow this. We register and use the data for example to enable you to use banking services abroad.

## THIRD PARTIES WITH WHOM WE SHARE YOUR PERSONAL DATA

In some instances, we may share personal data with third parties inside or outside Danske Bank Group:

- If you have asked us to transfer an amount to others, we disclose data about you that is necessary to identify you and fulfil the agreement.
- We disclose data about you to public authorities as required by law, e.g. CSSF, Financial Investigation Unit of the Grand Ducal Police, Luxembourg tax authorities and to Luxembourg's central bank (Banque Centrale de Luxembourg) for statistical and other purposes.
- We may disclose data with your consent or if permitted under existing legislation internally within the Group and to external business partners (including correspondent banks and other banks).
- We share your personal data with credit rating agencies. If you default on your obligations to Danske Bank International, we may report you to credit rating agencies and/or warning registers in accordance with applicable regulation.
- In connection with IT development, hosting and support, we transfer personal data to data processors, including data processors in third countries outside the EU and the EEA. We ensure that your rights are safeguarded and that the level of protection is maintained in connection with such data transfers by using, for example, standard contracts approved by the European Commission or the CNPD (Luxembourg's data protection agency).

## PROFILING AND AUTOMATED DECISIONS

### Profiling

Profiling is a form of automated processing of your personal data that we use e.g. to offer you specific services and products that meet your preferences, determine prices of certain services and products and for marketing purposes.

### Automated decision making

With automated decision making, we use our systems to make decisions based on the data we have about you. We use automated decisions for example to approve loans or credit cards and to prevent fraud. Automated decision making helps us make sure that our decisions are quick, fair, efficient and correct, based on what we know.

## YOUR RIGHTS

### Insight into your personal data

You can obtain insight into the personal data we have registered and use, where it comes from and what we use it for. You can obtain information about how long we store your data and who receives data about you, to the extent that we disclose data in Luxembourg and abroad. Your right of access may, however, be restricted by legislation, protection of other persons' privacy and consideration for our business and practices. Our know-how, business secrets as well as internal assessments and material may also be exempt from the right of insight.

### Manual processing

You can obtain insight into how an automated decision was made and the effects of the decision, and you are entitled to manual processing of any automated assessment.

### Objection to direct marketing

You have the right to object to our use of your personal information for direct marketing purposes, including profiling that is related to such purpose.

### Correction or erasure of Danske Bank's data

If the data is incorrect, incomplete or irrelevant, you are entitled to have the data corrected or erased with the restrictions that follow from existing legislation and

rights to process data. These rights are known as the “right to rectification”, “right to erasure” or “right to be forgotten”.

#### **Restriction of use**

If you believe that the data we have registered about you is incorrect, or if you have objected to the use of the data, you may demand that we restrict the use of these data to storage. Use will only be restricted to storage until the correctness of the data can be established, or it can be checked whether our legitimate interests outweigh your interests.

If you are entitled to have the data we have registered about you erased, you may instead request us to restrict the use of these data to storage. If we need to use the data we have registered about you solely to assert a legal claim, you may also demand that other use of these data be restricted to storage. We may, however, be entitled to other use to assert a legal claim or if you have granted your consent to this.

#### **Withdrawal of consent**

You can withdraw your consent to disclose data that requires your consent at any given time. Please note that if you withdraw your consent, we may not be able to provide you with specific services or products. Note also that we will continue to use your personal data, for example, to fulfil an agreement we have made with you or if we are required to do so by law.

#### **Data portability**

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

## **CONTACT DETAILS AND HOW YOU CAN COMPLAIN**

You are always welcome to contact us if you have questions about your privacy rights and how we register and use personal data. You can contact our Group Data Protection Officer at [dpofunction@danskebank.com](mailto:dpofunction@danskebank.com).

If you are dissatisfied with how we register and use your personal data, and your dialogue with the Data Protection Officer has not led to a satisfactory outcome, you can contact our complaints handling unit: Danske Bank International, Legal Department, BP173, L-2011 Luxembourg, e-mail: [r4538leg@danskebank.lu](mailto:r4538leg@danskebank.lu). You can also lodge a complaint with CNPD (Luxembourg’s data protection agency) through [www.cnpd.lu](http://www.cnpd.lu).