

Privacy statement of S-Bank Group service providers and other contractual counterparties

1. Data controller / data controller's contact information

When S-Bank Plc and its group company purchase services or enter into other partnership agreements related to credit institution activities, investment services, or fund business or related real estate projects with legal persons and entrepreneurs.

Postal address: PO Box 77, 00088 S-RYHMÄ

Visiting address: Fleminginkatu 34, FI-00510 Helsinki

2. Data Protection Officer's contact details

S Bank Group, Data Protection Officer

Postal address: S Bank Plc, P.O. Box 77, 00088 S-RYHMÄ, FINLAND

Email address: tietosuojavastaava@s-pankki.fi

3. Name of register

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Data subjects are legal persons that are counterparties to the agreements at any given time or natural persons acting on behalf of legal persons that are counterparties to the agreements at any given time, with whom a company belonging to S-Bank Group is or has been in a contractual relationship, or with whom the drafting of a possible agreement has been discussed, or to whom an agreement has been offered or drafted. In addition, data subjects include beneficial owners of legal persons.

4. Purposes of and legal basis for processing personal data

The processing of personal data is mainly based on a request for offers, competitive offers and/or a negotiated, valid or terminated agreement between a company belonging to S-Bank Group and the company represented by the data subject.

4.1 Purposes of personal data

- The preparation of a purchase, a contractual relationship and the management and development of the contractual relationship, including communications with the contracting counterparty
- Carrying out statutory obligations and orders and instructions issued by the public authorities
- Management, development and quality assurance of services in accordance with the instructions of S-Bank Group
- Development of business operations
- Monitoring and analysing the use of products and services

- Risk management
- Assurance of the safety of services and investigation of malpractice

4.2 Prevention and investigation of criminal activities

Due diligence information and other personal data of a service provider, partner, and their representatives and beneficial owners can be used to prevent, expose and investigate money laundering and funding of terrorism, and to mount a formal investigation of money laundering, funding of terrorism and crimes whereby the property or funds that were the object of the money laundering or terrorism funding were acquired.

The personal data of the data subject may be used to determine whether the service provider, partner or their representative of the company belonging to S-Bank Group or the person who is the beneficial owner is subject to international sanctions applied by the controller.

4.4 Legal bases for processing

Personal data is processed in the register on various legal bases.

Below is a description of the legal bases for processing of personal data that are used by the register and examples of processing carried out on each basis. Personal data of potential contractual partners may also be processed on the same legal bases.

Legal bases for processing	
Legal basis	Example
Measures that precede entering into a contractual relationship or agreement	Measures that are based on an agreement or on entering and the fulfilment of one.
Statutory obligation	Due diligence information as defined by legislation; information, registration and reporting obligations as defined by legislation; or investigations based on sanctions regulation.
Legitimate interests of the data controller or a third party	The production of services and the development of processes, business and systems, as well as risk management, require the processing of personal data. The data controller's legitimate interest is normally based on the relationship between the controller and the service provider or partner whose representative or beneficial owner the data subject is. The data controller ensures that the processing mentioned here is proportionate in view of the interests of the data subject, and that this processing meets their reasonable expectations.

5. Personal data categories

The personal data processed for the purpose of the register is divided into categories. You can find the personal data categories we process and descriptions of their data content below.

Personal data categories	
Personal data category	Data content of the category
Basic data	Basic data for drawing up an agreement, such as the data subject's or potential contractual partner's representative's or beneficial owner's: · name · address · personal identity code · date of birth · telephone number · email address · citizenship, country of residence and country of taxation · position, profession In addition, the following information may be processed in the register: · basic data of the authorised person or another similar person associated with the service provider or another counterparty · basic data of a contact person, authorised representative or beneficial owners of a customer that is a company or an organisation.
Due diligence information	Due diligence information about the data subject required by law, such as information necessary to identify the service provider or partner whose representative or beneficial owner the data subject is, and to determine their financial position and political exposure and any sanctions to which they are subject.
Consents	Details of the agreements between the controller and the service provider or partner whose representative or beneficial owner the data subject is, such as the basic data contained in the agreements or other personal data necessary for the fulfilment of the agreements. Information provided or produced by the data subject in connection with use.
Content of recordings and messages	Records and messages in different formats, where the data subject is one of the parties, such as telephone call recordings or emails.
Technical identification data	An identifier assigned by a device or application whereby you can be identified, using additional information if necessary.
Behavioural data (including data collected using cookies or other equivalent technologies)	Tracking your online behaviour and use of services by using cookies, for example. The data collected may include a page you have browsed, your device model, a unique device and/or cookie identifier, the channel you have used (app, mobile browser or internet browser), your browser version, the location of your network or mobile device, your IP address, session identifier, time and duration of the session, and your screen resolution and operating system.

6. Personal data recipients and recipient categories

An S-Bank Group company may disclose personal data as permitted by law within S-Bank Group for the purpose of contractual relationship management and the Group's risk management. In addition, personal data is disclosed to affiliated entities of S-Bank Group companies and contractual partners of the aforementioned parties, which are responsible for matters related to the contractual relationship (such as lease administration and invoicing), as well as S-Bank Group's financiers and advisors.

In addition, personal data is disclosed to competent authorities in connection with regulatory reporting.

When disclosing personal data in the register, the controller takes the requirements of legislation, including confidentiality obligations imposed on the controller into account.

7. Transfer of personal data

We use subcontractors to provide our services and in other bank activities. We transfer personal data to subcontractors to the extent required by the service they provide, and they process the data on behalf of the bank. Personal data is transferred to a limited extent outside the European Union and the European Economic Area. When data is moved to third countries, we use standard contractual clauses issued by the EU Commission or another transfer mechanism approved by legislation. You can read more about the standard contractual clauses on the EU Commission's website: https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers_en

Some of the subcontractors we use are other S Group entities. Among other things, they provide us with IT and other support services.

8. Personal data retention time and criteria for determining retention time

Personal data is processed during the validity of the contractual relationship or as long as necessary due to the requirements based on the sector-specific legislation governing the financial sector.

The retention period is usually the duration of the contractual relationship plus 10 years after its expiry. When the retention period ends, the personal data is deleted or anonymised in compliance with the deletion processes of S-Bank Group. The personal data of potential contractual partners will be erased or anonymised no later than two years after the last contact or the establishment of a potential contractual relationship.

9. Sources and updating of personal data

We collect your personal data from a service provider or partner company or directly from you. In addition, we can collect and update, as permitted by legislation, your personal data from registers of third parties such as the Population Information System, the Trade Register and other public authority registers, and from data controllers of credit data registers.

We may obtain necessary information on your political exposure and for determining whether you are subject to international sanctions from third parties maintaining databases on these subjects.

10. Rights of the data subject

You have the right to obtain our confirmation as to whether your personal data is being processed or not. If we process your personal data, you have the right to receive a copy of such data. We are entitled to charge a reasonable administrative fee for additional copies requested by you. You also have the right to request that we rectify or erase your personal data.

If you make a request electronically and have not requested any other delivery format, the data will be delivered in the electronic form that is generally used, providing that the data can be delivered securely. We will deliver a copy of the personal data to be processed in electronic form by e-mail.

In certain situations, you also have the right to request restrictions on the processing of your personal data or otherwise to object to the processing of your data. Additionally, you may request the transfer, in machine-readable form, of data that you have submitted yourself, based on the General Data Protection Regulation.

Please submit requests related to the exercise of your rights by email to asiakastietokysely@s-pankki.fi. In addition to the name, a request related to the exercise of rights must indicate other information identifying the agreement, such as the name of the agreement, the date of signature and the signatories, based on which information about the data subject can be retrieved from the register. If you consider the processing of your personal data to be unlawful, you have the right to make a complaint or contact the office of the Data Protection Ombudsman, who acts as the supervisory authority.

If you consider the processing of your personal data to be unlawful, you may file a complaint with the competent supervisory authority.

11. Protection of the register

We protect personal data throughout its lifespan by using appropriate technical and organisational measures of protection against the loss, unauthorised use or misuse, unauthorised disclosure, alteration, or destruction of the data. The measures we use to protect and supervise the personal data include the following:

- Protection of hardware and files
- Access control
- Identification of users
- Management of access rights
- Logging of usage events
- Guidance for and supervision of processing the personal data

Personal data is only processed by our employees who must do so to carry out their duties. All persons processing personal data are bound by banking secrecy and an obligation of confidentiality.

We also require our subcontractors to appropriately protect and carefully process any personal data they process.

If your personal data end up in the wrong hands despite all our protective measures, we will immediately investigate the matter and seek to prevent any damage caused by the infringement of personal data protection. We will inform the required authorities and the data subjects of the infringement of data protection in compliance with legal requirements.