

**1. INTRODUCTION**

TF Bank Group (TF Bank) is the so-called "controller" for your personal data, which means TF Bank determines the purposes and means of the processing of your personal data. TF Bank is committed to protection and respecting your privacy.

With this privacy statement it is TF Banks aim to give you further details about how we process and secure you justified interest in protecting your personal data and your rights. The privacy statement is a supplement to TF Banks terms and conditions. The processing of personal data within TF Bank is regulated by the General Data Protection regulation (GDPR) (Regulation (EU) 2016/679). TF Bank provides financial products and services through its affiliated companies and branches in Sweden, Norway, Finland, , Estonia, Latvia, Lithuania, Poland, Germany, Austria, Denmark and Spain. The GDPR applies to all EEA/EU countries and therefore it is TF Banks aim that this privacy statement should cover information on processing of personal data in all TF Bank countries.

**2. CATEGORIES OF PERSONAL DATA**

By personal data TF Bank understands "any information relating to an identified or identifiable natural person ("data subject")". By "customer" means a data subject who has entered or is planning to enter a contractual relationship with TF Bank. TF Bank processes personal data, such as Social Security Number (SSN), address, citizenship, e-mail address, phone number, bank account numbers, copy of government issued ID (passport, drives license), copy of electronic signature or ID etc.

TF Bank processes personal data on financial information such as credit reports and the purpose and intended nature of the business relationship.

TF Bank processes personal data provided during the customer relationship, such as changes in the contract, payments, transactions, transaction history etc.

TF Bank processes personal data on data subjects that have applied for TF Banks products or services, but have been rejected or have not for other reasons entered a customer relationship with TF Bank.

**3. PURPOSE AND LAWFULNESS***3.1 Purpose of processing*

TF Bank processes personal data for the following purposes:

- a) for marketing purposes, such as newsletters, affiliate marketing and tracking customers behaviour online
- b) for the performance of a loan agreement, deposit agreement, a credit card arrangement or a payment solution concerning on-line purchasing,
- c) to comply with legal obligations, such as fraud prevention, Anti Money Laundering and Terrorist Financing purposes, financial reporting, calculation of capital requirements for credit risk, tax reporting and reporting to authorities concerning,
- d) for market- and customer analysis, business- and method development, risk management and statistics, to improve TF Banks products, services and customer communications.
- e) for targeting activities via Google Analytics, Google Ads and Facebook Ads

*3.2 Legal grounds*

TF Banks processing of personal data is based on the following legal grounds;

**a) Fulfillment of contractual requirements**

TF Bank processes personal data necessary to perform a financial contract with you or persons who have intended to enter into a contract with TF Bank. This normally includes registration of transactions, calculation of outstanding claims, invoicing, follow-up of changes in credit risk, payment remarks etc. Prior to the conclusion of a credit agreement, it is necessary to make a credit assessment. In this context, it will be relevant, among other things, to process your contact information and financial information; such as tax returns, pay slips and any payment remarks.

**b) Consent**

TF Bank uses consent as legal ground for direct marketing purposes, such as newsletters related to TF Bank's products. Applicants and customers can give their consent to receive direct marketing during the applications process and before entering into an agreement with TF Bank. A consent can be withdrawn at any time.

**c) Legal obligations**

TF Bank process your personal data to meet its obligations according to laws, regulations and decisions of the authorities.

#### d) Legitimate interest

Finally, TF Bank process your personal data if the processing is necessary for the purposes of a legitimate interest, and where that interest is not overridden by fundamental rights and freedoms of the data subject(s). TF Bank has assessed the following processing activities to be within TF Banks legitimate interest:

- to processes personal data on data subjects that have applied for TF Banks products or services, but have been rejected or have not for other reasons entered a customer relationship with TF Bank. TF Bank should be able to document to the authorities that loan applications are rejected if the applicant does not have good enough finances to be able to service the loan and to be able to document the background for the rejection to a customer who complains about this.
- to prevent fraud by capturing major changes in application information where a new loan application follows shortly after a rejection. For this reason, it is necessary for TF Bank to retain certain information about a rejected loan application for a time period after the rejection.
- using automated decision making and so-called profiling. For example, TF Bank is conducting automated credit decisions on a loan application, for performance of the contract. Profiling is used for customer analysis, method development, marketing, automated decisions and transaction monitoring to counter fraud. The legal basis for profiling is TF Bank's legitimate interest, legal obligation or performance of contract. TF Bank uses profiling to increase understanding of our customers so that we can provide you with services and information that are more suited to your needs and interests as well as to fulfill legal obligations.
- for using Google Ads and Facebook Ads for targeting purposes.

#### **4. FROM WHERE TF BANK COLLECTS PERSONAL DATA**

TF Bank collects personal data from the following sources:

- Data provided by you to TF Bank
- Internally generated data within TF Bank Group such as transaction history
- TF Bank e-commerce partners
- Information service suppliers, such as private and public records
- Loan application intermediaries and affiliates
- Credit bureaus
- From service providers tracking user movements online, such as via cookies

#### **5. RETENTION OF PERSONAL DATA**

TF Bank will retain your personal information for the period necessary to fulfill the purposes outlined in this statement unless longer retention is required or permitted by law. Normally this means (a) a five (5) year retention period for individuals who have applied for a TF Bank product, but have been rejected or chosen not to fulfill an application, (2) a ten (10) year retention period for customers who have terminated an agreement (cash loan, deposit, credit card, e-commerce credit) with TF Bank, counted from the termination date.

#### **6. DISCLOSURE AND TRANSFER OF PERSONAL DATA**

Your personal data is protected by bank secrecy, which means that TF Bank may not disclose any personal data to unauthorized persons.

When permitted with regards to bank secrecy, TF Bank shares certain personal data with other recipients.

Personal data will be disclosed or transferred to the below list of third parties authorized as our processors to act on our behalf or within the TF Bank Group for designated purposes:

- Other TF Bank Group entities and our collaborators
- Marketing partners and targeting providers such as Google Analytics, Google Ads and Facebook Ads
- Payment recipients and payment providers
- Insurance providers
- Information service providers
- Information system suppliers
- third parties who are independent controllers, such as collection agencies, insurance providers, brokers, other banks and public authorities pursuant to law

## 7. THE DATA SUBJECT'S RIGHTS

- You have the right to information on how TF Bank is processing your personal data, and you can contact TF Bank if you wish to have detailed information about the processing of your personal data. TF Bank may request that you are specific in that regard.
- You have the right to withdraw your consent to process personal data for marketing purposes, including both direct marketing and the use of tracking services, such as cookies
- You have the right to request access to your personal data processed by TF Bank, unless TF Bank has a right or a legal obligation not to share personal data or unless the data can be disclosed in a secure manner
- You have the right to rectification or erasure of your personal data if certain requirements are met, and if TF Bank no longer can prove legal basis for the processing
- You have a right to data portability, which is closely related to the right of access but differs from it in certain ways. The right to data portability allows you to receive the personal data that you have provided to TF Bank, in a structured, commonly used and machine-readable format, and to transmit those data to another data controller.
- You have a right to lodge a complaint connected to data processing directly to TF Bank, see contact details under section 8. If you are unsatisfied with the reply received from TF Bank, you have the right to lodge a complaint with the relevant regulator.
- You have the right to object to the processing of your personal data that takes place on the basis of legitimate interests, unless the legitimate interest overrides your fundamental rights and freedoms

The relevant supervisory authority for TF Bank is the Swedish Data Protection Agency - Integritetsskyddsmyndigheten (IMY).

### Contact details Integritetsskyddsmyndigheten:

[www.imy.se](http://www.imy.se)

Telefon: 08-657 61 00

E-post: [imy@imy.se](mailto:imy@imy.se)

## 8. CONTACT DETAILS TF BANK

If you wish to exercise your rights described in section 7., or if you have questions regarding this privacy statement or want to lodge a complaint with TF Bank you can contact the following:

TF Bank AB (publ)

Att: Dataskyddsombud (DPO)

Box 947

501 10 Borås

Tel: 033-722 35 00

[dpo@tfbank.se](mailto:dpo@tfbank.se)

TF Bank may edit this privacy statement. The latest version of the privacy statement should always be available on our websites.