

Information on the processing of personal data at Sydbank

1. General duty of disclosure

Before Sydbank acts as a data controller, you must according to the General Data Protection Regulation be informed about how and when the Bank collects, processes and/or discloses your personal data.

2. Collection and processing of data

To enable the Bank to provide its services to you, we need your name, address, civil registration number (CPR) and possibly business registration number (CVR), and you must provide information about your tax situation. You must provide documentation of the information given by showing your passport or other documentation with photo and CPR number.

In addition, you must provide information about the purpose and the expected scope of your client relationship with the Bank.

Providing the Bank with the required information is optional for you. If you decide not to provide such information, the Bank may be unable to provide advisory services to you or otherwise serve you.

Generally, the Bank does not collect and process sensitive personal data about you. However, if you have yourself provided us with material containing sensitive personal data - for instance, data stated in an email or a budget relating to your health situation or membership of a certain political party or union - we will consider this your acceptance that the Bank may store such data. The Bank will not, however, use such data in other contexts.

The Bank collects information for the purpose of offering all kinds of financial services, including payments, advisory services, client management, client administration, provision of insurance and mortgage credit, credit rating, internal risk management, marketing and fulfilment of obligations in accordance with legislation.

If you use credit or payment cards, NetBank or other kinds of payment services, the Bank will obtain information from you, shops, financial institutions and others. We do this in order to execute and adjust payments and prepare bank statements, payment overviews, etc.

The Bank will obtain information from the Danish Central Office of Civil Registration as well as other sources and records accessible to the general public. In connection with credit assessment, we will enquire whether you are registered at credit information agencies or included on warning lists. The Bank updates the information on an ongoing basis.

We register communication with you and record certain telephone conversations, for instance regarding investment.

According to the Danish legislation on measures to prevent money laundering and financing of terrorism, we are obliged to investigate the background behind and the purpose of all complex and unusual transactions and activities and to register the results of these investigations.

The Bank will exchange data with branches outside Denmark through reports to the Danish State Prosecutor for Serious Economic and International Crime according to the Danish legislation on measures to prevent money laundering and financing of terrorism.

Moreover, we obtain information about you from our business partners (including correspondent banks and other financial institutions), in the instances when consent has been given or in accordance with the law.

We store this information as long as it is necessary in relation to the purposes that were the reason behind the collection, processing and storing of your data.

According to the Danish Act on Measures to Prevent Money Laundering and Financing of Terrorism, we will store information, documents and other relevant registrations for at least five years after the termination of the business relations or the completion of the individual transaction. Recorded communications and telephone conversations (voice logs) according to the MiFID rules are accessible for you for at least five years if you contact the Bank in this regard.

We store data you have provided us with in order to establish a client relationship for a period of up to two

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years - even though the client relationship is not established. We do this in order to protect us against fraud.

3. Basis for data processing

The legal framework for the processing by Sydbank is the financial regulation and other legislation, including

- The Danish Act on Measures to Prevent Money Laundering and Financing of Terrorism (hvidvaskloven)
- The Danish Tax Control Act (skattekontrolløven)
- The Danish Bookkeeping Act (bogføringsloven)
- The Danish Credit Agreements Act (kreditaftaleloven)
- The Danish Act on Payments (betalingsloven)
- The Danish Data Protection Act (databeskyttelsesloven)

Moreover, the Bank will process your information if necessary due to an agreement you have entered into or consider entering into with the Bank or if you have given your consent, cf. Article 6(1), paragraphs a and b of the General Data Protection Regulation or if one of the other rules on the processing of data of Article 6(1) and Article 9 of the General Data Protection Regulation apply.

The Bank will process your information when necessary to pursue a legitimate interest of the Bank. This may, for instance, be for the protection against unauthorised use and loss, for the strengthening of IT and payment security and for direct marketing purposes.

4. Disclosure and transfer of data

In order to fulfil agreements with you, for instance if you have asked us to transfer an amount to others, then we will disclose the information about you that is necessary to identify you and implement the agreement.

The Bank will also disclose information about you to public authorities to the extent we are obliged to do so according to the law, including the Money Laundering Secretariat at the Danish State Prosecutor for Serious Economic and International Crime according to the Danish Act on Measures to Prevent Money Laundering and Financing of Terrorism, and to the Danish Customs and Tax Administration (SKAT) in accordance with the Danish Tax Control Act.

In addition, the Bank discloses information to external business partners (including correspondent banks and other financial institutions) if you have consented to this or if such disclosure is possible according to legislation.

If you are in breach of your obligations to the Bank, the Bank may report you to credit information agencies and/or warning lists according to the rules in force.

In connection with IT development, hosting and support personal data is transferred to data processors, including data processors in third countries outside the EU and EEA. A list over these third countries can be seen on sydbank.dk. We use a number of legal mechanisms, including standard contracts approved by the EU Commission or the Danish Data Protection Agency to ensure that your rights and protection level follow your data.

5. The Bank's duty of confidentiality and your right of access to information

The Bank's employees are under a duty of confidentiality and are not allowed to disclose information which has come to their knowledge in the course of their employment with the Bank unless authorised to do so.

You are entitled to know which data the Bank processes about you, where it derives from and for which purpose it is used. Also, you can be informed of how long we store your data and the recipients of your data.

However, access to such information can be limited by legislation. For instance, you cannot obtain information as to whether we have registered any information and, if so, which information, in connection with the investigations we are obliged to make according to legislation on money laundering. Also, you cannot obtain information as to whether we inform the Danish State Prosecutor for Serious Economic and International Crime or which information, we disclose to the Danish State Prosecutor for Serious Economic and International Crime in case of suspicion of money laundering or financing of terrorism.

Such limitation may also be imposed in order to protect other persons' personal life and the Bank's business foundation and business procedures; and also the Bank's know-how, business secrets and internal assessments and material may be exempted from the right of access to data.

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6. Profiling and automatic decisions

In certain cases, the Bank will carry out an automatic assessment of your personal data, for instance to analyse your financial situation or your preferences. We do this, for instance if we need to prepare a statutory credit rating (credit score) or investment profile and in order to target our marketing to you.

The Bank uses automated decision-making to a limited extent. You will be informed in advance if a decision is automated.

7. Right to have your data corrected or deleted

If the information that the Bank has registered about you is incorrect, incomplete or irrelevant, you are entitled to a correction or deletion of the data subject to the restrictions ensuing from legislation or other legal basis.

If the Bank has given other erroneous information, we will make sure that the information is corrected.

8. Limitations to data processing

If you contest the correctness of the information that the Bank has registered about you or if you have, according to Article 21 of the General Data Protection Regulation, objected to the processing of the information, you may demand that the Bank restricts the processing of such information for storage. The processing is exclusively restricted to storage until the correctness of the information can be ascertained or it can be controlled whether the legitimate interests of the Bank are prioritised higher than your interests.

If you have a right to have the information deleted that the Bank has registered about you, you can instead request the Bank to limit the processing of such information for storage.

If the processing of the information that the Bank has registered about you is necessary solely to assert a legal claim, you may also demand that other processing of this information is limited to storage. The Bank may apply other processing procedures if it is necessary to assert a legal claim or if you consent in this respect.

9. You can withdraw your consent

Permission to disclose information that requires your consent may at any time be terminated when you withdraw your consent.

10. Right to receive your data (data portability)

If the Bank processes information on the basis of your consent or due to an agreement, you are entitled to have the information you delivered to us handed out in an electronic format.

11. Complaint about the Bank's processing of data

If you are dissatisfied with the way we handle your personal data, you may file a complaint with the Bank. You may also file a complaint with the Danish Data Protection Agency (Datatilsynet), Borgergade 28, 5th floor, DK-1300 Copenhagen K or dt@datatilsynet.dk.

12. Contact details on data controller and data protection compliance officer

The data controller is:

Sydbank
Peberlyk 4
6200 Aabenraa
CVR-nr. 12626509
sydbank.dk
info@sydbank.dk

Sydbank's data protection compliance officer (DPO) can be contacted at dpo@sydbank.dk.

Translation

The above is a translation of the Danish "Information om behandling af persondata i Sydbank". In case of doubt the Danish original will apply.