

# Ecster privacy notice

## How we process your personal data at Ecster

For Ecster, every individual's right to protection of their personal integrity is vital, and awareness of the duty of banking confidentiality as well as integrity is a natural part of day-to-day business. When we design and develop our products and services we have put in place technical, physical and organisational controls to protect the confidentiality, integrity and availability of your personal data and the information we hold and process about you.

Here we explain what personal data Ecster processes and why we do this. You will also find information about how we obtain your personal data, with whom we may share it, and for how long we hold your personal data. We describe the situations in which we use profiling and automated decision-making, and how you can access your personal data. Information is also given about how you can contact us for comments or questions relating to our processing of personal data.

The information provided below is, as applicable, based on the different relationships you may have with Ecster, for example if you are

- An existing or prospective customer
- A guardian, trustee or other approved representative
- A payer, pledgee or guarantor
- A beneficial owner, account signatory or authorised user for a corporate customer of Ecster
- In contact with Ecster in your professional role, for example as employee of a bank, consultancy company, supplier or authority
- An individual without a current agreement with Ecster whom we contact in connection with a direct marketing activity

## What personal data does Ecster process?

We have divided personal data into different categories. The personal data we hold about you relates to the following categories with (not exhaustive) examples:

- Basic personal data (e.g. customer number, name, contact details, identification number)
- Personal preferences (e.g. acceptance of direct marketing, language, acceptance of cookies)
- Assessments and classifications (e.g. according to regulations relating to anti-money laundering, markets in financial instruments or information related to US taxpayers)
- Agreements (all kinds of information related to agreements, e.g. account numbers, credit numbers, cards, property designations, powers of attorney)
- Financial transactions (e.g. account deposits and withdrawals, credit payments, card transactions and securities transactions)
- Transaction information (eg information about the item or service purchased)
- Communication (e.g. e-mail and, where relevant, telephony recordings)

- Audit (e.g. IP or MAC address, logs of when you identify yourself electronically in our online services)

One category includes categories of personal data that are particularly sensitive, such as health information. We will, however, only process that kind of information where it is relevant for a specific product or service.

Where appropriate, we also handle personal data relating to your representatives, such as guardians, trustees or other approved representatives.

To help us ensure the physical safety of you and our employees and to help us combat fraud, money-laundering and other crime, we use systems in our branches such as camera surveillance.

### For what purposes does Ecster process personal data?

Ecster processes personal data for the various legal reasons and purposes described below. If you, for any reason, prefer not to provide us with certain necessary personal data, or wish to withdraw such data, we may not be able to provide you with our services and products.

#### Performance of a contract

The overall purpose of Ecster collecting, processing and holding personal data is to be able to prepare, provide and administer the products and services we offer you – digitally, or by phone, with a contract as the legal basis. Ecster may also process personal information to manage client clubs and bonus programs on behalf of partners.

We may also record and/or monitor your phone calls with us, and for certain products we are under a legal duty to do so. This legal requirement applies when you make securities transactions by phone with Ecster, but we also record phone calls to help us verify a contract or a conversation with you and for training purposes.

#### Legal obligations

In order to comply with its legal obligations, Ecster processes your personal data for the following purposes (this list is not exhaustive):

- To check and verify your identity
- To monitor and analyse how you use your account(s) and other services, in order to prevent and detect fraud, money laundering or other crime
- To document and hold personal data relating to credits and other services
- To handle security requirements for online payments and account access
- Reporting to authorities, such as the Tax Authority or the Financial Supervisory Authority
- To comply with rules and regulations relating to accounting, risk management and statistics

#### Ecsters interests

Ecster offers financial services with the aim of creating good, long-term relationships with our customers. We therefore process your personal data relying on legitimate interests for the following purposes (this list is not exhaustive):

- To perform market and customer analyses in order to improve our products, services and channels
- Carry out marketing activities where we identify and, for your own part or through Sales companies, suggest products or services that can be assumed to be relevant to you, if you have not told us that you do not want to take part in such activities and offers
- To perform customer surveys
- To develop and improve our products, services and IT systems, including for the purpose of testing
- To develop, maintain and validate models and methods for risk analyses e.g. anti-money laundering, fraud prevention or capital adequacy
- To perform risk analyses and obtain statistics, for example, in order to improve our credit risk models.

### With your consent

For specific products or services, we may need your consent in order to process your personal data. In this case we present this as a written declaration, separated from our product and service agreements or other matters. There we also describe how you can withdraw your consent and the effect this will have for you regarding that specific product or service.

An example where we use consent is when you use our website, where we add a cookie with an unique ID in your web browser. We use that information for web analysis that allows us to understand how our web site is used. Consent is given when you accept cookies the first time you visit our website from a specific web browser. However, we do not track how individuals use the site, and therefore we do not collect or store personal data such as the name, IP address or e-mail in our cookies.

Another example of when we can use consent is in connection with the exchange of information with affiliated sales companies that provide a customer club, bonus program or membership etc.

### Profiling and automated decision making

In some cases Ecster uses so-called profiling. This means an automated processing of personal data in order to perform analyses relating to the customer's financial situation, personal preferences or behaviour in different channels.

Profiling is also used in some cases in automated decision making, which can for example be an automated approval / rejection of a credit application. By making automated credit assessment, we increase the speed, objectivity and accuracy when we offer the services. These credit decisions are based on internal purchase and payment history together with various information from an external credit report such as risk forecast, income and payment remarks. The data is then checked against our credit templates. Next, a weighted risk assessment is made. If the weighted assessment shows a higher risk, you may be denied credit, as this may indicate poorer repayment capacity. However, you as the applicant of the credit always have the right to contact our customer service in order to object to an automated decision and have it reviewed by our administrators.

## From where we obtain your personal data

We obtain the information from you directly, for example, when you apply for a credit with Ecster, or when using your different services on Ecster. We also collect information from our sales companies, public and other registers, such as registers at the National Register of Personnel (SPAR), the Swedish Tax Agency and the Information Center (UC).

## Who we share your information with

Ecster is under a legal obligation not to disclose your information unless this is for legitimate purposes, such as the fulfilment of a contract with you, or in connection with any other legally required or permitted purpose, such as reporting to authorities.

In order to fulfil the conditions of our product and service agreements with you, we may need to share information about you with other companies within the Handelsbanken Group as well as with companies outside the Group which provide contracted services to us or to you. Such recipients include banks, payment service providers and other financial infrastructure parties, suppliers, insurance companies, agents, sales companies and other parties that are involved in the product agreement.

Examples of circumstances when we disclose personal data about you outside Ecster are (this list is not exhaustive):

- To licensed credit reference agencies when you apply for a credit at Ecster
- To third parties who provide contracted services to us or to you, e.g. payment service providers, approved sub-contractors or those who act as our agents
- To established payment intermediaries when we make a payment on your assignment, such as Bankgirot or Mastercard
- To cooperating sales companies that will provide purchased goods / services or offers
- To banks and payment institutions in countries inside and outside the EU/EEA, when we perform a transfer of money or funds at your request
- To governmental, regulatory or revenue authorities, for the purposes of complying with our legal and regulatory obligations e.g. tax, anti-money laundering, anti-terrorism and immigration laws and regulations
- To licenced fraud prevention agencies and other similar organisations to help us fight financial crime
- To partners who offer a customer club, bonus program or membership in cooperation with Ecster
- To companies that are engaged for customer surveys etc.
- To insurance companies that can provide insurance solutions, such as loan protection

## Transfers to third countries

In some situations, we may transfer personal data to recipients outside the EU/EEA (the European Economic Area) - "third countries". This mainly occurs when we transfer money or other assets to a recipient in a third country at your

request with an agreement as the basis for the transfer. Another situation is when Ecster is obliged to provide personal data to an authority in a third country.

If we do not have an agreement with you about a transfer to a third country, one of the following conditions must be met for us to make a transfer:

- That the European Commission has decided that the third country ensures an adequate level of protection
- That there are other safeguards such as standard data protection clauses or binding corporate rules
- That there is a specific authorisation from a supervisory authority or
- That it is permitted under applicable data protection legislation

### For how long do we hold your personal data?

We only hold your personal data as long as it is required in order for us to fulfil the conditions in the contract for any products and services you have with Ecster. We also hold personal data to comply with our legal, regulatory and business record retention requirements.

If you close your account or a service with Ecster, we will need to retain some of your personal data for a specific period of time relating to that account or service. For example, we need to retain some personal data for seven years in order to be able to report to tax authorities and up to ten years to comply with requirements from rules and regulations on anti-money laundering.

If you apply for a product or service but then do not enter into any agreement with Ecster, your personal data will be stored, usually no longer than three months.

If you are not a customer at Ecster and we have contacted you in a direct marketing activity, your personal data is retained for a maximum of three months.

Recordings from camera surveillance are retained for a maximum of two months.

### How you can control and access your personal data

You have several rights concerning your personal data processed by Ecster:

- You can at any time request a copy of the personal data we hold about you, which is normally free of charge. <https://www.ecster.se/om-oss/hantering-av-personuppgifter/begaran-om-registerutdrag>
- If you do not wish to receive direct marketing you can contact Ecster on phone 08-701 46 67.
- If you find that we hold inaccurate information about you, we will correct this as soon as we have been made aware of it.
- You can request erasure or restriction of the processing of your personal data under certain conditions
- You can object to our processing of your personal data that we base on the legitimate interests of Ecster, as described above
- You can obtain a digital copy of most of the personal data you have provided to Ecster, which we process in our systems. We can also, at your request and if technically feasible, transfer this personal data directly to other companies or authorities that process your personal data. This is called data

- portability.
- You can, when Ecster uses profiling and automated decision-making contact Ecster for an explanation and raise your objections to the decision

### More information

If you have a question or wish to make a complaint about how we process your personal data, please contact Ecster or alternatively write to the our Group Data Protection Officer at e-mail [dpo@ecster.se](mailto:dpo@ecster.se) or to the following mailing address:

Handelsbanken  
Data Protection  
Officer  
SE- 106 70  
Stockholm

You also have the right to lodge a complaint with Ecster [kundklagomal@ecster.se](mailto:kundklagomal@ecster.se) or the supervisory authority regarding the processing of your personal data ([datainspektionen.se](http://datainspektionen.se))