

Nordiska's Privacy Policy

Covers Bankaktiebolaget Nordiska (publ), including the Rocker brand

Nordiska strongly values you as a customer and your personal privacy. In order for us to provide our services and perform the agreement we have with you, we need to process your personal data. This Privacy Policy explains how Nordiska collects, uses, stores and shares personal data when you use our services. It also describes your rights in relation to Nordiska and how you can exercise your rights. The Policy aims to provide you with clear and transparent information about our processing of personal data in accordance with the EU General Data Protection Regulation (GDPR). Nordiska is the data controller for the processing of your personal data.

We encourage you to read the Privacy Policy carefully before using our services. If you have any questions about how we handle your personal data, you can always contact us at info@nordiska.se. You may also send an email to our data protection officer at dpo@nordiska.se.

1. WHAT PERSONAL DATA DOES NORDISKA COLLECT?

Information you provide to us

We only process personal data that is adequate, relevant, and necessary in order to offer you our services. You may directly or indirectly provide us with information about yourself in a number of different ways, such as when you apply for a product, contact us, use our customer web portal, chat service or another of Nordiska's services where you provide personal data.

Examples of personal data you may provide to us:

- **Personal and contact information** (e.g. name, personal identity number, copy of identity document, marital status, nationality, postal address, email address, mobile phone number, employment)
- **Financial information** (e.g. income, employer, form of employment, form of housing and bank account number)
- **Payment information** (e.g. bank account number, invoice information)
- **Information required by law and for taxation** (e.g. tax residence, foreign tax identification number, information required for basic customer due diligence and anti-money laundering purposes)

Information we collect about you

When you use any of our services, we may need to collect information about you, either ourselves or through third parties in order to keep our information accurate, perform credit assessments and fulfil legal requirements.

Examples of information we may collect:

- **Personal and contact information** (e.g. name, date of birth, personal identity number, marital status, nationality, postal address, email address, mobile phone number)
- **Financial information** (e.g. your income, any credit commitments, negative payment history, previous payment and credit approvals, transaction information)
- **Information about goods/services** (e.g. details concerning the goods/services you have purchased if these are connected with the credit)
- **Historical information** (e.g. payment and credit history, previous purchase history)

- **Information about how you interact with Nordiska** (e.g. how you use our services, including information about outstanding and historical debt and your repayment history, page response times, download errors, how you accessed and left the service, interactions with customer service including our chat service, delivery notices when we contact you)
- **Device information** (e.g. IP address, language settings, browser settings, time zone, operating system, platform and screen resolution)
- **Geographical information** (your geographical location)
- **Recorded phone calls** (we record phone calls when you contact customer service)
- **Information from PEP lists and external sanctions lists** (we may compare your personal data against lists of persons who are so-called politically exposed persons (PEPs) and lists of persons subject to sanctions. The lists include information such as name, date of birth, place of birth, occupation or position and the reason why they are included on the lists)

2. HOW DO WE PROCESS YOUR PERSONAL DATA AND ON WHAT LEGAL BASIS?

We process your personal data only for specific, explicitly stated purposes and we always ensure that we have a legal basis for the processing in accordance with GDPR. All data we collect and process is used to provide, perform and improve Nordiska's services.

When we process your personal data based on our legitimate interest, for example to improve our services, we have carried out a balancing of interests to ensure that our legitimate interest does not override your fundamental rights and freedoms. The processing is limited to what is necessary and you always have the right to object to and oppose this type of processing. We may then only continue to process your data if we have compelling legitimate grounds for the processing that override your privacy interests.

Where we process your personal data based on consent you have the right to withdraw your consent at any time. You can do this by contacting us at info@nordiska.se.

Nordiska processes personal data for the following purposes based on the following legal bases:

Purpose of processing	Examples of personal data	Legal basis for processing
Provide and administer our services (e.g. loans, savings accounts, cards, payments)	Name, personal identity number, contact details, financial information, account details, transaction history	The processing is necessary for the performance of a contract (Art. 6.1(b) GDPR) and for us to be able to fulfil our obligations under the agreement you have entered into with us
Fulfil legal obligations (customer due diligence, accounting, reporting to authorities)	All relevant data, including identity data, transactions and information from PEP and sanctions lists	The processing is necessary due to legal obligation (Art. 6.1(c) GDPR), as we must comply with Swedish and European law
Confirm your identity and verify your personal and contact details	Name, personal identity number, contact details and other relevant identity information	The processing is necessary due to legal obligation (Art. 6.1(c) GDPR), as there are legal requirements for us to establish the identity of our customers
Carry out credit assessments	Relevant information for the specific assessment, e.g.	The processing is necessary due to legal obligation (Art. 6.1(c) GDPR), as

	contract information and payment history	we are required by law to assess your creditworthiness
Communicate with you and handle customer service matters	Name, contact details, information about your matter	The processing is necessary for the performance of a contract (Art. 6.1(b) GDPR) and legitimate interest (Art. 6.1(f) GDPR) in providing you with efficient service and ensuring that content is presented correctly and efficiently
Prevent misuse of Nordiska's services, criminal activity and fraud, and ensure the security of our services and systems	Identity information, transaction patterns, device information (e.g. IP adress)	The processing is necessary due to legal obligation (Art. 6.1(c) GDPR), such as legal requirements for us to establish customers' identities, and legitimate interest (Art. 6.1(f) GDPR) in protecting you, us and our systems from crime and misuse
Develop and improve our services (through customer analysis and statistics)	Usage patterns, customer engagement, technical data (the data is often aggregated or pseudonymized)	The processing is based on legitimate interest (Art. 6.1(f) GDPR) in understanding how our services are used so that we can improve and develop them
Market our own and partners' products and services	Name, contact details, information about which services you use	The processing is based on legitimate interest (Art. 6.1(f) GDPR) in ensuring functionality, analysing use and providing customised content to customers For electronic direct marketing and non-essential cookies, we always obtain your consent (Art. 6.1(a) GDPR). You always have the right to withdraw or change your consent
Establish, exercise or defend legal claims (e.g. in debt collection)	Relevant information for the specific claim, e.g. contract information and payment history	The processing is based on legitimate interest (Art. 6.1(f) GDPR) in being able to handle disputes and collect claims
For recruitment, and for administration and evaluation of your application	Name, contact details, application documents, information from interviews and tests, and information from references	The processing is based on legitimate interest (Art. 6.1(f) GDPR) in being able to handle the recruitment process efficiently and find the right candidate for the position To carry out a background check on you, or to save your application for future recruitment needs, we obtain your consent (Art. 6.1(a) GDPR). You

		always have the right to withdraw or change your consent
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Information about Cookies

When you visit Nordiska's or Rocker's website, or use our services in the app, we may store or retrieve information in your browser/your device in the form of cookies to ensure functionality, analyse use and provide you with customised content. A cookie is a small text file that is stored on your computer, mobile phone or other device when you visit a website. The information collected may relate to you, your preferences, or your device and is used to make the service work as you expect. The information usually does not directly identify you, but it can give you a more personalised experience. We use cookies and similar tracking technologies to provide you with a tailored online experience.

We always obtain your consent (Art. 6.1(a) GDPR) for the use of cookies when you visit our website for the first time. You may choose not to allow the use of cookies and still continue to visit our website. You may also choose to delete all cookies stored on your computer. Instructions on how to delete stored cookies or change cookie settings are provided in the instructions for your browser or in the help function available in most browsers. If you choose to block the cookies used on our website, this may affect your experience of our website, for example certain functions will not work. You can read more about our handling of cookies, and at any time change or withdraw your consent to the use of cookies, on our website [Cookie Policy | Nordiska](#).

Automated decisions and profiling

To ensure objective and consistent decisions in connection with your application for credit and other financial services, and to protect your privacy, Nordiska uses automated decision-making, including profiling. The purpose is to enable us to make fast, objective and accurate decisions and to fulfil legal requirements on responsible lending. Nordiska is required by law to assess your creditworthiness in order for us to gain an understanding of your risk profile before we grant credit.

Before we make an automated decision that may significantly affect you, we carry out profiling based on your information. Such profiling is used to assess your financial situation before decisions concerning the provision of credit and other financial commitments. Automated decision-making means that your personal data is analysed using statistical models and external credit information to assess your creditworthiness. Your data is evaluated against our internal policy and our models, which reflect the assessment of your liquidity and ability to pay, in combination with scoring models from credit information companies. This automated assessment determines whether your application for credit and other financial services will be approved. If an application is rejected due to a search in a database, we will promptly inform you of the result of such search to the extent that such disclosure would not conflict with applicable legislation.

You always have the right to object to an automated decision, express your opinion and request that your application for credit and other financial services be reviewed by a real person (human review). Contact us if you wish to do this at info@nordiska.se.

More information about your right to object to automated decision-making is set out in section 4 "Your rights".

Communication and customer surveys

Based on legitimate interest (Art. 6.1(f) GDPR) in being able to improve our services, we may contact you to inform you about services similar to those you already use, and to conduct customer satisfaction surveys. You always have the right to object to this type of communication by contacting us at info@nordiska.se.

With whom may we share your information?

Your personal data is protected by banking secrecy, which means that we may not disclose such information without authorisation. Where permitted under banking secrecy, we share certain types of data with other recipients. We may transfer to, or share your information with, selected third parties for the performance of our contractual obligations to you and for other purposes described in this Privacy Policy. The recipients with whom we share your specific data, and for which purposes, depend on which of Nordiska's services you use. We take all reasonable legal, technical and organisational measures to ensure that your data is handled securely and with an adequate level of protection when transferred to or shared with such selected third parties. These measures include, among other things, access restrictions, encryption, logging and internal procedures for data protection. If you would like to receive a copy of the safeguards we have taken or information about where they have been made available, please contact us at info@nordiska.se.

We share your personal data with third parties only when it is necessary, adequate and relevant for the specific purpose.

Suppliers

In order to fulfil the purposes of our processing of your personal data, we share your personal data with companies that provide services to us, such as identity providers, communications providers, payment service providers, notification service providers, and IT service providers. These companies may only process your personal data in accordance with our explicit instructions and may not use your data for their own purposes. They are also required by law and contract to protect your personal data in accordance with GDPR.

Payment recipients and payment service providers

For payments, personal data may be shared with the payment recipient and the payment recipient's bank, as well as payment service providers. The data shared includes identity information, such as name, personal identity number and account details, for example account number. This processing takes place so that we can perform our agreement with you. Personal identity numbers are processed because this is necessary in view of the importance of secure identification of you.

Other banks and identity service providers

When BankID is used, personal data is shared with the provider of the e-service where you use BankID, i.e. the party to whom you identify yourself. The data shared includes identity information, such as name, personal identity number and account details, for example account number. This processing takes place so that we can perform our agreement with you. Personal identity numbers are processed because this is necessary in view of the importance of secure identification of you.

Credit information companies

Your personal data may be shared with credit information companies and providers of similar services for the purpose of assessing your creditworthiness when you apply for one of Nordiska's credit products, and to confirm your identity and address. We may also disclose information about any deficient payment on your part to credit information companies.

Credit intermediaries

If you have entered into a credit agreement with us through a credit intermediary, we disclose certain information to the credit intermediary in order to perform our agreement with the credit intermediary. The information disclosed consists of identity information (e.g. name and personal identity number) and credit information (e.g. credit amount, disbursement date). This processing takes place in order to perform our agreement with the credit intermediary with whom you have been in contact. Personal identity numbers are processed because this is necessary in view of the importance of secure identification of you.

Debt collection companies or other companies that take over our claim against you

Nordiska may also share your personal data if we sell or assign unpaid debts to a third party such as a debt collection company for collection. We share your personal data based on our legitimate interest in collecting and selling debts. If we have a claim against you, we may share the necessary personal data with debt collection companies in order to establish, assert and exercise our legal claim, or with other companies that take over our claim against you.

Authorities and counterparties

Nordiska may disclose necessary information to authorities such as the Swedish Police Authority, the Swedish Tax Agency and other authorities if we are required to do so by law, if you have consented to us doing so, or if it is necessary to administer tax deductions. In Sweden, for example, Nordiska shares information about interest with the Swedish Tax Agency to calculate your tax. Your personal data may also be shared with third parties when necessary to prevent, detect and investigate fraud and other criminal activity

Partners and other third parties

In order to provide certain services, we share necessary data with our partners. These partners may only process your personal data in accordance with our explicit instructions and may not use your data for their own purposes. Partners are also required under applicable legislation and agreements entered with us to protect your personal data. Nordiska may also share your information with other third parties, which may occur if Nordiska sells or purchases business operations or assets. In such cases, Nordiska may disclose your personal data to a potential seller or buyer of such business operations or assets. Furthermore, if Nordiska, or a substantial part of Nordiska's assets, is acquired by a third party, personal data about Nordiska's customers may be shared. We will not sell your personal data to a third party unless we have your consent to do so.

Transfer of personal data to third countries and safeguards

As a main rule, we and our suppliers and partners process your personal data only within the EU/EEA. In certain cases, personal data may be processed outside the EU/EEA if there is a Commission decision that the third country in question ensures an adequate level of protection, or after appropriate safeguards have been taken.

Appropriate safeguards may include:

- binding corporate rules,
- standard contractual clauses adopted by the European Commission,
- approved codes of conduct or certification mechanisms, or
- legally binding instruments between authorities

You can find more information about which countries are considered to have an adequate level of protection on the European Commission's website, and you can read more about standard clauses on the website of the Swedish Authority for Privacy Protection.

We take appropriate technical and organisational security measures to protect your personal data against unauthorised access, loss or unauthorised processing. These measures include, among other things, access restrictions, encryption, logging and internal procedures for data protection. If you would like to receive a copy of the safeguards we have taken or information about where they have been made available, please contact us at info@nordiska.se.

How long do we retain your personal data?

How long Nordiska retains your personal data depends on the purpose for which the personal data is used. We retain your personal data only for as long as is necessary for the purpose for which it was collected, or for as long as required by law. Personal data that we process for the purpose of administering the contractual relationship, and to perform our agreement with you, is generally processed for the duration of the agreement. After the agreement has ended, the personal data may be retained for up to ten (10) years in order to establish, exercise or defend legal claims, in accordance with Swedish law. We may also process personal data, following a balancing of interests, for as long as necessary to protect ourselves against legal claims and exercise our rights. In certain cases, Nordiska must retain personal data in order to comply with applicable legal requirements which require personal data to be retained, usually, for seven (7) and five (5) years respectively. In recruitment, we retain your personal data and, if you are not offered employment with us, the personal data is always deleted within two (2) years after the recruitment process has ended.

3. PROCESSING OF PERSONAL DATA IN RECRUITMENT

Your privacy is important to us at Nordiska. When you apply for a position with us, or register your interest in future opportunities, we process the personal data that you provide to us in connection with your application.

Personal data processed during recruitment includes:

- **Contact details** (e.g. name, email address, telephone number and address)
- **Application documents** (CV, cover letter, grades, certificates and other documents you attach)
- **Information from interviews and tests** (e.g. notes from interviews, results from any personality or skills tests)
- **Information from references** (information we receive from the referees you have provided - we only contact references after informing you)

We do not collect special categories of personal data (e.g. health) unless it is absolutely necessary and permitted under employment law. Nordiska may perform a background check on you during recruitment. Before we perform a background check, we always obtain your consent. You always have the right to withdraw or change your consent.

4. YOUR RIGHTS

Below is a summary of your rights, i.e. what you are entitled to in relation to Nordiska:

- **Right to information**- You have the right to receive information about how your personal data is processed. We primarily provide the information through this Privacy Policy and by answering questions from you.
- **Right of access (register extract)**- You have the right to request confirmation of whether we process your personal data and to receive a free copy of the data we have about you.
- **Right to access your personal data ("data portability")** - You have the right to receive the personal data you have provided to us in a structured, machine-readable format. This right applies to data processed on the basis of a contract or consent. You also have the right to have this data transferred directly to another data controller, if technically possible.
- **Right to rectification**- You have the right to correct inaccurate or complete incomplete information that we have about you.
- **Right to erasure ("the right to be forgotten")** - In certain cases, you have the right to have your personal data erased. This applies, for example, to data that is no longer necessary to process for the purpose for which it was collected, or if you withdraw your consent for a certain processing activity. However, we would like to draw your attention to the fact that there may be cases where Nordiska cannot erase your data. This may be because the data is still necessary to process for the purpose for which it was collected, because Nordiska's interest in continuing to process the data outweighs your interest in having it erased, or because Nordiska is subject to legal obligations that prevent us from immediately erasing the data. We will inform you of this when you submit a request for erasure.
- **Right to request restriction of Nordiska's processing**- If you believe that the data we have about you is not accurate, that our processing is unlawful, or that we do not need the data for a specific purpose, you have the right to request that we restrict our processing of such data. You may also request that we do not process your data while we check this, or while we check whether you have the right to object to certain processing as described below.
- **Right to object to Nordiska's processing**- You may object to our processing that is based on Nordiska's legitimate interest (see Art. 6.1(f) of the GDPR) on grounds relating to your personal circumstances. We may then only continue to process your data if we have compelling legitimate grounds for the processing that override your privacy interests.

- **Withdrawal of consent-** Where we process your personal data based on your consent, or explicit consent, you have the right to withdraw all or part of a consent given at any time with effect from the time the withdrawal is made.
- **Right to object to an automated decision that significantly affects you-** You have the right to object to an automated decision made by Nordiska and request that it be reviewed by a real person (human manual review).
- **Right to lodge a complaint-** If you have complaints about Nordiska's processing of personal data, you can contact Nordiska's data protection officer by sending an email to dpo@nordiska.se. You may also contact Integritetsskyddsmyndigheten (IMY), which is the Swedish supervisory authority for Nordiska's processing of personal data.

Contact details for IMY are:

Website: www.imy.se

Email: imy@imy.se

5. CONTACT

Bankaktiebolaget Nordiska (publ) is registered with the Swedish Companies Registration Office under corporate identity number 556760-6032. Nordiska has its registered office at Riddargatan 10, 114 35 Stockholm, and the postal address is Box 172, 101 23 Stockholm. Nordiska is the data controller for the processing of your personal data as described above and complies with Swedish and European data protection legislation.

Our customer service is an important part of our operations and is happy to receive your questions about data protection and personal data. You can always reach Nordiska's customer service at info@nordiska.se. You may also send an email to our data protection officer at dpo@nordiska.se.

6. OTHER

We may make changes to this Privacy Policy. The latest version of the Privacy Policy is always published on Nordiska's and Rocker's website.