

SIP NORDIC OY PRIVACY NOTICE

This is the privacy policy of SIP Nordic Oy regarding the processing of personal data which SIP Nordic Oy performs as the processor of SIP Nordic Fondkommission AB. In this privacy policy “we” or “us” refers to SIP Nordic Fondkommission AB, a Swedish limited liability company operating under the business identity code 556708-6649 , and having its registered address at Kungsgatan 27, 111 56 Stockholm, Sweden, as well as its affiliates, including SIP Nordic Oy.

SIP Nordic Fondkommission AB is the data controller, which means we are the party that decides on the processing of your personal data, as well as the grounds for such processing. In addition, we may use data processors to process your personal data. The data processors process your personal data subject to the instructions provided by us as the data controller. Please note that our affiliates are data processors, not the data controller even if they would have collected your personal data. Such collection is still done pursuant to our instructions.

Your privacy is of utmost importance to us, and we take all steps that are required from us under applicable privacy law to protect your privacy and only process your personal data to the extent necessary to provide you with the services we have agreed to provide.

In this privacy policy, we explain how we use personal data we collect from you when you use our website or services.

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2 YOUR PERSONAL DATA WE COLLECT

2.1 Our Services

For you to use our services, we collect the following information on you:

- Name, home and email address, phone number, social security number;
- information on your net assets, income and expenses as informed by you;
- political connections and other information required for anti-money laundering purposes and

Please also note that we record phone calls.

3 SOURCES OF PERSONAL DATA

Most of your personal data we collect and process is collected directly from you. This happens when you:

- register online for a user account;
- place an order for any of our products or services through us or our processors; or
- voluntarily complete a survey or provide feedback via email or

We also obtain your personal data from the following sources:

- public registers to verify your home address and children under your custody

4 USE OF PERSONAL DATA

We collect your personal data for the following purposes:

- processing your orders and managing your account;
- providing the services and products that we have agreed to provide you based on the contract between you and us; and
- complete our obligations arising from law

5 SHARING OR DISCLOSING YOUR PERSONAL DATA

5.1 Issuing Banks, Regulators, and Credit Reference Agencies

We also share your personal data with the issuing banks as is necessary to complete your order. If required by applicable law, we will also share your personal data with the authorities who are responsible for monitoring or regulating the financial industry. We may also disclose your personal data to, as well as use the resulting information from, credit reference agencies to prevent any attempted fraud.

We co-operate with the following issuing bank and therefore will share your data with them:

5.2 Skandinaviska Enskilda Banken AB (pub)Partners

Lastly, should you agree, we will share your personal data with our carefully selected partner companies so that they may market and otherwise offer you their products and services.

6 INTERNATIONAL TRANSFERS

We do not disclose or share your personal data with third parties that are located outside of the European Economic Area.

7 PERSONAL DATA STORAGE

We store your personal data on our server, which is located in Sweden.

8 DATA RETENTION PERIODS

We retain your personal data for as long as (i) we need it to offer you the services we have agreed to provide you; (ii) required by mandatory law; or (iii) another acceptable reason requires.

As soon as reasonably practicable after we no longer have a reason to retain your personal data, we will delete it manually.

Except as otherwise required by mandatory law, we typically delete personal data after **five** years from them being collected.

9 MARKETING

With your consent, we will periodically send you information about our products and services that we believe may be of interest to you.

Even if you would agree to receive our marketing, please note that you can always opt out of receiving such marketing messages at any later date. Upon your request, we will stop contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please click [here](#).

10 YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA

Below are your legal rights with respect to your personal data that is collected and processed by us:

10.1 The Right to Access

You have the right to request us for copies of your personal data that are in our possession. Although in normal circumstances we provide you with these copies free of charge, we may charge you a reasonable fee for this service should your requests be manifestly unfounded or excessive, or because of their repetitive character.

10.2 The Right to Rectification

You have the right to request us to correct any of your personal data, which is inaccurate. You also have the right to request us to supplement your personal data, which is incomplete.

10.3 The Right to Erasure

You have the right to request us to erase your personal data unless mandatory law applicable to us prevents us from doing so or we have lawful for reason to refuse such a request.

10.4 The Right to Restrict Processing

You have the right to request us to restrict processing your personal data, unless mandatory law applicable to us prevents us from doing so or we have lawful reason to refuse such a request.

10.5 The Right to Object to Processing

You have the right to object to us processing your personal data unless mandatory law applicable to us prevents us from doing so or we have lawful for reason to refuse such a request.

10.6 The Right to Data Portability

You have the right to request us to transfer to you or another organisation your personal data that we have collected. In such cases, we will transfer your data in a commonly used format such as a CSV-file.

10.7 Contact Details for Exercising Your Rights

We use SIP Nordic Oy as our data processor in Finland and should you want to make a request under sections 10.1-10.6, please contact SIP Nordic Oy via the contact details provided in this section 10.7.

Email: mika.raukko@sipnordic.fi

Telephone: +358 50 554 22 04

Address: Kasarmikatu 36, 00130 Helsinki, Finland

You will receive a response to your enquiry within thirty (30) calendar days.

10.8 Exercising Rights on behalf of Another Person

Should you wish to exercise any rights on behalf of another person, for example an underage child in your custody, please prepare to prove your authority to act on behalf of the other person. If you would wish to exercise the rights on behalf of an underage child to whom you have joint custody, please note that you will also need to prove the identity of any other custodian, as well as his or her consent to you exercising rights on behalf of the child.

11 COOKIES

When you use or access our website, we may use so called "cookies". Cookies are text files installed by a website on your computer, which collect standard Internet log information and behavioural information of website visitors. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

11.1 Our Use of Cookies

We use cookies to improve your experience on our website. This includes:

- Allowing our website to function properly
- Allowing our websites to load faster and safer

- Showing you relevant information
- Improving your user experience by collecting anonymised data

Only first-party cookies are used.

11.2 How to manage cookies

You can set your browser not to accept cookies.

Please note, however, that in certain limited cases, some of our website features will not work as a result of not accepting cookies.

12 PRIVACY POLICIES OF THIRD PARTIES

This privacy policy only applies to SIP Nordic Oy, its services, and the website (<https://sipnordic.fi/>). Services and websites of other entities (even those of SIP Nordic Fondkommission AB and its other affiliates) are subject to separate and additional privacy policies and we remind you to also review and acquaint yourself with such privacy policies should you visit their website or use their services.

Please further note that we do not have control over the privacy policies or practises of any third parties, their services, or websites even if such would be linked to our websites. Please always read the privacy policy related to any third party, their website, or services in order to understand how your personal data will be collected and processed by such a third party.

13 CHANGES TO OUR PRIVACY POLICY

We continuously maintain and update this privacy policy. Updates to this privacy policy will be made directly to this policy and notified by publishing a new version of this privacy policy on our website. If any update would have a material impact on your rights or obligations under this privacy policy, we will separately notify you by placing a notification on our website. For this reason, we encourage you to periodically review this privacy policy and follow any communications we may place on our website.

This privacy policy was last updated on [date].

14 CONTACT INFORMATION

14.1 Our Contact Information

Should you have questions about this privacy policy, your personal data we have collected and process, or should you desire to exercise any of your rights with respect to your personal data, please do not hesitate to contact us.

Email: mika.raukko@sipnordic.fi

Telephone: +358 50 554 22 04

14.2 Contact Information of the Data Protection Authority

SIP Nordic Oy Privacy Notice

25.10.2021

Should you desire to file a complaint or believe we have failed to address your concern in a satisfactory manner, you may contact the Office of the Data Protection Ombudsman in Finland.

<https://tietosuoja.fi/en/contact-information>

Email: tietosuoja@om.fi

Address: PL 800, 00531 Helsinki, Finland

Switchboard: +358 29 566 6700