

S-Bank Plc

Privacy Statement

1. Data controller / data controller's contact information

S-Bank Plc

Postal address: S-Bank Plc, P.O. Box 77, 00088 S-RYHMÄ

Street address: Fleminginkatu 34, FI-00510 Helsinki

2. Data Protection Officer's contact details

S Bank Group, Data Protection Officer

Postal address: S-Bank Plc, P.O. Box 77, 00088 S-RYHMÄ

Email: tietosuojavastaava@s-pankki.fi

3. Name of register

S-Bank Plc's customer register

The purpose of the register is to provide and maintain the services of S-Bank and companies belonging to S-Bank Group.

4. Purposes of and legal basis for processing personal data

Banking activities and the provision of services require the processing of personal data. For example, our customer register covers the processing of personal data necessary for account, credit and investment services. The data subjects in the register are our customers, potential customers, trustees, guarantors or pledgors, and parties to decedent's estates. Data subjects can be natural persons or organisations, including entrepreneurs. The data subject can also be a contact person, authorised representative or beneficial owner of a customer company or organisation, or a person authorised to use the company's or organisation's account.

We are bound by legal obligations that require us to collect sufficient information about our customers – for example, to get to know the customer. Agreements related to the provision of our services and the conclusion of such agreements also require the provision of your personal data. If for any reason you do not wish to provide us with your personal data, we may be unable to provide you with all our services or products. In addition, in the absence of your data, we cannot guarantee the realisation of the deposit guarantee. In the event that the deposit guarantee becomes necessary, the Financial Stability Authority will make a decision on the covered deposits based on the available data. If the identity of the deposit owner cannot be determined, no deposit protection compensation can be paid for the deposit.

Checks related to the fulfilment of our legal obligations may cause a delay in the start of the customer relationship. In certain cases, it is also possible that the start of a customer relationship will be completely prevented.

4.1 Purposes of personal data

- Customer service, management and development of customer relationship, including customer communication
- Carrying out statutory obligations and orders and instructions issued by public authorities
- Production, development, and quality assurance of banking and investment services, and a strong electronic identification service
- Implementation of deposit guarantee obligations and measures
- Execution of payment services and account services
- Granting of credit
- Business development and fundraising
- Tracking and analysis of the use of products and services, and the segmentation of customers for business development and to enable us to provide users with personalised content in products and services
- Implementation of customer feedback and customer surveys and studies, and the processing and analysis of the results and the creation of related statistics, as well as the presentation of the results in digital channels for marketing purposes
- Direct marketing
- Targeting of marketing and advertising on S-Bank's website, S-mobiili and our partners' networks, for example
- Risk management
- Assurance of the safety of services and investigation of malpractice
- Camera surveillance
- Training purposes
- Use of statistical data as part of media work

4.2 Automated decision-making and profiling

The processing of personal data in our register includes automated decision-making. Automated decision-making is a process where a person does not participate in decision-making, but decisions are made by our system which processes and analyses the data. If a product or service you purchase involves such automated decision-making, we will inform you thereof when you purchase that product or service. If we make a decision completely automatically, you can also ask us to review and make a decision manually if you wish.

For example, within our register, we make automated decisions related to loans and payment cards, which involve profiling to assess your creditworthiness and repayment ability, as well as to protect your interests. Such a situation may be a suspicion of payment card abuse, for example. In the automated decision-making process, we look at the prerequisites for granting a loan or credit, your ability to pay, and your payment behaviour. We also carry out automated decision-making in accordance with the terms and conditions; if the right to a certain feature expires, the use of a payment card may be blocked. Such a situation can be the termination of a benefit programme, for example.

We may make a loan or credit decision automatically based on your personal credit information, customer information, and the data you provide in your application. We also assess your creditworthiness during the lifecycle of the credit relationship by monitoring the repayment of the credit, for example. With the aid of automated decision-making, we ensure the uniformity of our decisions and act as a responsible lender. We regularly review our decision-making methods to ensure they are fair, efficient and equitable.

The processing of personal data in our register includes profiling. Profiling means the automatic processing of personal data to evaluate certain personal characteristics.

For example, we also carry out profiling in connection with providing investment advice to assess your risk tolerance or to create a suitable target market for you based on your investor profile. We also carry out profiling to fulfil our obligations to prevent money laundering and terrorist financing, and to identify the risk of misuse and abuse. In addition, profiling can be used to target marketing and content so that we can recommend products or services that are just right for you.

4.3 Prevention and investigation of criminal activities

We may use your identification information and other personal data to prevent, detect and investigate money laundering and terrorist financing. In addition, we may use the data to mount a formal investigation of money laundering or terrorist financing and of crimes whereby the property that was the object of the money laundering or terrorist financing was acquired.

We may use your personal data to determine whether you are subject to international sanctions that we apply.

We may process your personal data for crimes or suspected crimes that are directly related to our credit institution activities if necessary for the prevention and investigation of such crimes.

4.4 Legal bases for processing

We process your personal data on different legal bases.

Below you can find the legal bases for the processing of personal data we use and examples of data processing.

Legal bases for processing	
Legal basis	Example
Measures that precede entering into a contractual relationship or agreement	Measures based on a contract such as an account, card, credit or investment service agreement, or its conclusion (for example, execution of a payment order).
Statutory obligation	Legislation related to our activities, such as laws on credit institutions, mortgage banks and investment services, as well as requirements and obligations related to payment services, require the processing of personal data. Personal data is processed on these bases for purposes such as making credit decisions or to assess the suitability of investment services and products, as well as for risk management.

Legal bases for processing	
Legitimate interests of the data controller or a third party	<p>The production of services, marketing activities and content targeting, both in our own services and in external channels, as well as the development of processes, business and systems, as well as risk management and bank fundraising, require the processing of personal data. This allows us to maintain and improve our product range and optimise the services offered to you. This may also involve profiling (see the paragraph on profiling).</p> <p>To the extent permitted by regulation, the bank transfers personal data to the service providers it uses based on legitimate interest.</p> <p>The legitimate interests of the data controller are based on a customer relationship or an equivalent relationship between the data controller (us) and the data subject (you). As a data controller, we ensure that such processing is proportionate to your interests and meets your reasonable expectations.</p>
Consent	<p>Electronic direct marketing and the targeting of marketing via email, SMS and S-mobiili notification messages.</p> <p>Marketing based on cookie choices and content targeting at s-pankki.fi and on external websites.</p> <p>For example, the collection and processing of location data on your web or mobile device are also based on your consent. Location data is processed so that we can tell you the location of your nearest branch, for example.</p>

5. Personal data categories

The personal data processed for the purpose of the register is divided into categories. You can find the personal data categories we process and descriptions of their data content below.

Personal data categories	
Personal data category	Data content of the category
Basic data	<p>Your basic information, including:</p> <ul style="list-style-type: none"> • name • address • personal identity code • date of birth • telephone number • email address • citizenship, country of residence and country of taxation • other information related to tax liability • position, profession <p>In addition, we may process the following data:</p> <ul style="list-style-type: none"> • basic data of a trustee, authorised person or equivalent person party to the customer relationship • basic data of a contact person, authorised representative, beneficial owner, and the holder of the right to use the account or online banking service of a customer that is a company or an organisation.

Personal data categories	
Due diligence information	Due diligence data specified in legislation, such as information needed to identify you, or to establish your financial position and political exposure.
Customer relationship data	Data that identifies and categorises your customer relationship, such as your membership in co-op member household and your investor profile information.
Consents	Consents and prohibitions you have given to the data controller (us) or consents you have given to a third service provider regarding the use of your payment account with S-Bank. Additionally, your consents to the use of consent-based features in the S-mobiili app.
Agreement and product details	Information about the agreements between the data controller (us) and the data subject (you), and data about the products and services you have purchased.
Customer transaction data	Tasks and events related to the management of the customer relationship, including account and payment transaction data.
Background data	Information such as your life situation and financial position.
Behavioural data (including data collected through cookies and other equivalent technologies)	Tracking your online behaviour and use of services through cookies, for example. The data collected may include a page you have browsed, your device model, a unique device and/or cookie identifier, the channel you have used (app, mobile browser or internet browser), your browser version, the location of your network or mobile device, your IP address, session identifier, time and duration of the session, and your screen resolution and operating system.
Content of recordings and messages	Records and messages in different formats where you are one of the parties, such as telephone call recordings or emails.
Technical identification data	An identifier assigned by a device or application whereby you can be identified, using additional information if necessary.

5.1. Personal data categories that pertain to potential customers

The data content that will be processed is determined based on the category of potential customers in question, among other things. For example, a potential customer relationship may start when you have applied for a loan from us, but you are not yet our customer, and we have not yet concluded a loan agreement with you. Below you can find the data content we typically process.

Personal data categories that pertain to potential customers	
Personal data category	Data content of the category
Basic data	Your name, personal identity code and contact details such as address, telephone number and email address.
Due diligence information	Due diligence information specified in legislation, such as information needed to identify you or to establish your country of tax residence, financial position and political exposure.

Personal data categories that pertain to potential customers	
Customer relationship data	Data that identifies your customer relationship, such as the start date and nature of the customer relationship.
Agreement and product details	Information about the offers we have made to you.
Customer transaction data	Tasks and events related to the management of the customer relationship.
Background data	Information such as your life situation and financial position.
Behavioural data (including data collected using cookies and other equivalent technologies)	Tracking your online behaviour and use of services through cookies, for example. The data collected may include a page you have browsed, your device model, a unique device and/or cookie identifier, the channel you have used (app, mobile browser or internet browser), your browser version, the location of your network or mobile device, your IP address, session identifier, time and duration of the session, and your screen resolution and operating system.
Recordings and their content	Records and messages in different formats where you are one of the parties, such as telephone call recordings or emails.
Technical identification data	An identifier assigned by a device or application whereby you can be identified, using additional information if necessary.

6. Personal data recipients and recipient categories

Recipient means another data controller, joint controller or processor to whom the personal data is transferred or disclosed. For example, the disclosure of personal data may mean a situation in which we disclose your personal data for the independent use of another data controller, or a situation in which we transfer your personal data to a personal data processor acting on behalf of S-Bank.

When required by law, we may disclose your personal data to authorities such as the Financial Supervisory Authority, the Finnish Tax Administration and the Financial Stability Authority. We provide the Tax Administration with annual reports on our customers, among other things.

Your data may also be disclosed to:

- to the extent permitted by law, within S-Bank Group, for the purposes of customer service, customer relationship management or marketing,
- for e-services relying on electronic identification when S-Bank offers an intermediary service for strong electronic identification,
- another party to a jointly owned or operated product or service such as a joint account or credit with joint liability,
- service providers, account information service providers and payment service providers for the purpose of transferring funds from payment services (e.g. credit transfer),
- international card companies and other parties relevant to payment transactions, such as merchants and mobile payment service providers,
- authorities such as the Social Insurance Institution Kela, Statistics Finland, tax, enforcement or police authorities, to fulfil legal obligations (for example, the Act on the Financial Stability Authority requires deposit banks to provide the authority with depositor and deposit information upon request),

- an insurance company when S-Bank acts as an agent of the insurance company,
- joint registers of banks and insurance companies to fight crime against banks and insurance companies and
- otherwise outside S-Bank Group, for example, in connection with a legal transaction carried out with a debt collection agency, fundraising, business transfer or another legal transaction with a business partner, or with your consent, when we offer you a product or service in cooperation with our partner.
- In addition, we disclose limited personal data about joint customers of SOK and S-Bank to the joint register of SOK and S-Bank (see section 13.3 of this statement).

7. Transfer of personal data

We use subcontractors to provide our services and in other bank activities. We transfer personal data to subcontractors to the extent required by the service they provide, and they process the data on behalf of the bank. Personal data is transferred to a limited extent outside the European Union and the European Economic Area. When data is moved to third countries, we use standard contractual clauses issued by the EU Commission or another transfer mechanism approved by legislation. You can read more about the standard contractual clauses on the EU Commission's website: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_e

Some of the subcontractors we use are other S Group entities. Among other things, they provide us with IT and other support services.

8. Personal data retention time and criteria for determining retention time

We process your personal data during the validity of the contractual relationship or as long as necessary to fulfil the requirements of the sector-specific legislation governing the financial sector. Legislation obliges us to retain some of your personal data, even after the customer or contractual relationship has ended. For example, data retention may be based on provisions on anti-money laundering and terrorist financing regulations, accounting, payment services, consumer credit, or investment services.

The retention period is usually the duration of the customer relationship plus 10 years after its expiry. At the end of the retention period, we delete or anonymise your data in accordance with our deletion processes. The personal data of our potential customers is deleted or anonymised no later than two years from the last time of contact, or from the time that the potential customer relationship was first established.

After the contractual relationship ends, we may process your personal data for direct marketing purposes in accordance with applicable legislation.

9. Sources and updating of personal data

We collect your personal data primarily from you. We may collect data when you use certain of our services such as online or mobile services, or when you interact with us by phone. We may also obtain your personal data from your other representatives (such as guardians of a minor, court-appointed legal guardian) to the extent permitted by law.

In addition, we can collect and update, as permitted by legislation, your personal data from registers of third parties such as the Population Register Centre, the Trade Register and other public authority registers, and from data controllers of credit data. We collect data related to your consumer credits from the positive credit register when you have credit from us or are applying for new credit.

We may obtain necessary information about your political exposure and for determining whether you are subject to international sanctions from third parties maintaining databases on these subjects.

In addition, we receive limited personal data about joint customers of SOK and S-Bank from the joint register of SOK and S-Bank (see section 13.3 of this statement).

10. Rights of the data subject

You have the right to obtain our confirmation as to whether your personal data is being processed or not. If we process your personal data, you have the right to receive a copy of such data. We are entitled to charge a reasonable administrative fee for additional copies requested by you.

If you make a request electronically, and have not requested any other delivery format, the data will be delivered in the electronic form that is generally in use, providing that the data can be delivered in a secure manner. To ensure data security, we always deliver a copy of personal data that is to be processed to S-Bank's online bank in electronic form.

You also have the right to request that we rectify or erase your personal data. In addition, you can control the processing of your personal data for marketing purposes by withdrawing your consent and objecting to the processing of personal data based on legitimate interest. You can give and remove your consent and prohibition in the online banking service, S-mobili, My S-channel at www.s-kanava.fi/kirjaudu or via the link in the email you have received.

In certain situations, you also have the right to request restrictions on the processing of your personal data or otherwise to object to the processing of this data. Additionally, you may request the transfer, in machine-readable form, of data that you have submitted yourself, based on the General Data Protection Regulation.

Please submit your requests related to the exercise of your rights by sending a message in the online banking service, calling +358 10 76 5800 (local/mobile network charge) or visiting your nearest branch office. You can find the up-to-date opening hours of our customer service and contact information for our branches on our website.

If you consider that the processing of your personal data is contrary to law, you have the right to appeal the matter or contact the office of the Data Ombudsman, who acts as the supervisory authority.

11. Right to withdraw consent

If we process your personal data based on consent, you have the right to withdraw your consent. Withdrawing consent will not affect the legitimacy of any other processing than that taking place based on consent or processing that was carried out with the data subject's consent before the withdrawal of the consent. The revocation of consent may, however, affect the functionalities and usability of the service.

12. Protection of the register

We protect personal data throughout their lifespan by using appropriate technical and organisational measures of protection against the loss, unauthorised use or misuse, unauthorised disclosure, alteration, or destruction of the data.

The measures we use to protect and supervise the personal data include the following:

- Protection of hardware and files
- Access control

- Identification of users
- Management of access rights
- Logging of usage events
- Guidance for and supervision of processing the personal data

Personal data are only processed by our employees who must do so to carry out their duties. All persons processing personal data are bound by banking secrecy and an obligation of confidentiality.

We also require our subcontractors to appropriately protect and carefully process any personal data they process.

If your personal data end up in the wrong hands despite all our protective measures, we will immediately investigate the matter and seek to prevent any damage caused by the infringement of personal data protection. We will inform the required authorities and the data subjects of the infringement of data protection in compliance with legal requirements.

13. Processing of SOK and S-Bank's joint customer data

13.1 Purpose of the joint register and data subjects

The SOK Corporation as the data controller and S-Bank Plc as the data controller are joint controllers of the data described in this privacy statement. In this description, we explain who belongs to this register and describe the data that is processed in the register. We also explain how the roles of joint controllers are arranged in relation to the data subjects. This section supplements the privacy statements of the customer registers of SOK and S-Bank.

Natural persons covered by the joint register:

- Customers who simultaneously have a valid co-op membership and an S-Bank customer account.
- Customers who have joined as a co-op member in the Become a co-op member online service.
- Customers who have signed an agreement to activate S-mobiili.

The joint task of S Group and S-Bank is to produce benefits and services for their customers. The purpose of the joint register is to enable the production and development of these benefits and services, so that you as a data subject can benefit from your customer relationship with both the shops and the bank in the best possible way. With the aid of the joint register, we can also develop S Group's and S-Bank's joint mobile application S-mobiili into an even better service.

With the joint register, we also want to make it as easy as possible for you to maintain the data related to your customer relationship, as well as to manage the consents of the joint register.

As data controllers, we use the data in the joint register for the common purposes described below. In addition, the data is used separately for the purposes specified in the privacy statements of S Group's co-op member and customer register, and S-Bank's customer register.

13.2 Purpose of the joint register and data subjects

Below is a list of joint data that S-Bank and SOK process for their joint purposes.

Legal bases for processing			
Data	Purpose	Data retention period in the joint register *	Legal basis
Basic personal data (name, personal identification number, date of birth, language, gender information, date of death).	Data maintenance and updates to enable the provision of co-op member benefits and employee benefits.	As long as the customer is in the joint register as described in paragraph 1.	Agreement, legitimate interest for gender information.
Contact information (permanent and temporary postal address, mobile phone number, other phone number, email address).	Data maintenance and updates to enable the provision of co-op member benefits and employee benefits.	As long as the customer is in the joint register.	Agreement.
Information about becoming a customer in the digital channel (Become a co-op member online service).	Providing the Become a co-op member online service.	6 months from becoming a co-op member	Agreement.
Information about the joining benefit offered by S-Bank.	Reporting and generating mutual interest.	As long as the customer is in the joint register. However, up to 18 months from joining.	Legitimate interest.
Employee data (data about being an employee, information about the right to employee discounts).	Data maintenance and updates to enable the provision of employee benefits.	As long as the customer is in the joint register.	Legitimate interest.
Co-op member household (information on the person's belonging to the co-op member household, period of validity, member/transaction number).	Data maintenance and updates to enable the provision of co-op member benefits and employee benefits.	As long as the customer is in the joint register.	Agreement.
Deposit account for benefits payable (number of current deposit account for benefits payable).	Data maintenance and updates to enable the provision of co-op member benefits and employee benefits.	As long as the customer is in the joint register.	Agreement.

Legal bases for processing			
S-Etukortti Visa, S-Bank Private Visa, S-Etukortti Debit (card type, card expiration date, information based on which co-op membership the card has been ordered).	Production of S-Etukortti Visa cards with customer data. Managing investigatory situations related to the provision of co-op member benefits.	As long as the customer is in the joint register.	Agreement.
Consent and prohibition data (direct marketing prohibition, email marketing consent, mobile marketing consent, telephone marketing prohibition, research survey prohibition, as well as restriction service Robinson prohibition data provided by Suomen Asiakkuusmarkkinointiliitto ry).	Data maintenance and updates.	As long as the customer is in the joint register.	Legitimate interest.
Data on S-mobiili activation.	Provision of the S-mobiili service.	The period of validity of the S-mobiili agreement.	Agreement.
Consent for S-mobiili (to use location data, to receive notifications).	Maintaining and updating data. Targeting of marketing, content and bulletins. Improving customer experience and business development.	As long as consent is valid. However, at most for the duration of the S-mobiili agreement.	Legitimate interest.
Customer feedback on S-mobiili given in S-mobiili.	Developing the S-mobiili app and responding to feedback.	2 years.	Legitimate interest.
S-mobiili's digital footprint (processing within the scope of the joint register and transfer to the customer registers of S-Bank and SOK).	Improving the customer experience, customer groupings based on the use of S-mobiili, targeting marketing communications, and developing S-mobiili.	2 years, but no more than the duration of the S-mobiili agreement.	Consent.

Legal bases for processing			
S-mobiili user interface choices made by the customer.	Personalisation of the S-mobiili user interface.	The period of validity of the selection, but no more than the period of validity of the S-mobiili agreement.	Agreement.
Information that the customer has marked the benefit as a favourite and removing the benefit from favourites.	Personalisation of the S-mobiili user interface. Improving the customer experience, targeting content and developing S-mobiili.	The period of validity of the selection, but no more than the period of validity of the S-mobiili agreement.	Agreement.
Customer groupings based on the use of S-mobiili.	Recommendation and personalisation of benefits and services. Personalisation of the S-mobiili user interface. Improving the customer experience, targeting content and developing S-mobiili.	5 years, but no more than the duration of the S-mobiili agreement.	Legitimate interest.
Mobile payment service activation data.	Data maintenance and updates to enable the provision of co-op member benefits and employee benefits.	As long as the customer is in the joint register, and the service has been activated.	Agreement.
S-Etukortti mobile activation data.	Data maintenance and updates to enable the provision of co-op member benefits and employee benefits.	As long as the customer is in the joint register, and the service has been activated.	Agreement.

* Personal data is also processed independently for the bank's own purposes as part of SOK's co-op member and customer register and S-Bank's customer register.

13.3 Personal data recipients and recipient categories

We disclose personal data from the joint register to S Group's co-op member and customer register, and to S-Bank's customer register in accordance with the table above. Among other things, the purpose of the data is the maintenance of basic data, the development of S-mobiili and customer analytics. We may disclose register data to third parties in accordance with the registers' privacy statements.

We ensure the lawfulness of the data transfer when the transfer of customer data outside the EU/EEA countries is necessary for the technical implementation of the processing of personal data.

13.4 Rights of the data subject of the joint register

As a data subject, you can turn to either data controller to exercise your rights in relation to the shared data. We recommend that you contact the data controller relevant to the exercise of your rights. For matters related to the customer relationship with SOK, you can contact SOK and, in the case of banking, S-Bank.

If you consider the processing of your personal data to be unlawful, you have the right to make a complaint or contact the office of the Data Protection Ombudsman, who acts as the supervisory authority.

You can prevent the processing of your personal data for advertising and analytics by exercising your right to object or by withdrawing your consent. As a result, for example, S-mobiili content may be less personalised, and we may be unable to target you with newsletters or advertising in the best possible way.

13.5 Contact details

Contact details of the Joint Register Data Protection Officers:

Contact details of SOK's Data Protection Officer: tietosuojavastaava@sok.fi

Contact details of S-Bank's Data Protection Officer: tietosuojavastaava@s-pankki.fi