S-BANK PLC

S-BANK PLC PRIVACY STATEMENT

1. Data controller and 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 the S-Bank Group.

4. Purposes of and legal basis for processing personal data

When we process your personal data, you become a data subject. Data subjects include our customers, potential customers, trustees, guarantors or pledgors, and parties and representatives to a deceased person's estate. The data subject can be a private individual, organisation or entrepreneur. 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.

Collecting personal data is mandatory in banking. We strictly comply with our legal obligations. For example, we need to collect enough information about our customers to properly know them. We also need to collect personal data in order to be able to sign agreements concerning our services with you. However, we only collect as much information about you as is necessary. 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.

If information about you is missing, we cannot guarantee that the deposit guarantee will be realised. In the event that the deposit guarantee becomes necessary, the Financial Stability Authority will make a decision on the covered deposits based on the information available to it. 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 a customer relationship cannot be started at all.

4.1. Personal data categories

The personal data we process is divided into specific 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	Your basic information, including: · 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 · address confidentiality. In addition, we may process the following data: · 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.
Due diligence information	Information specified in the legislation that we need to verify your identity and determine your financial position and political exposure. If the information you provide is incomplete, we may need to place restrictions on your use of the services.

Personal data category	Data content of the category
Customer relationship data	Information that identifies your customer relationship, e.g. whether you belong to a co-op member household or what your investor profile is.
Consents	Consents and prohibitions you have issued: · to us at S-Bank · to a third-party service provider regarding the use of your S-Bank payment account · to the S-mobiili app to use consent-based features.
Agreement and product data	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)	We track your online behaviour and use of services through cookies, for example. The data collected may include: · the page you are browsing · your device model · unique device or cookie identifier · the channel you are using (app, mobile browser or web browser) · your browser version · the location of your web or mobile device · your IP address · session ID, session time and duration · your screen resolution and operating system · form responses (excluding the Update your customer details service).
Recordings and the content of messages	Recordings and messages in various formats where you are one of the parties, such as telephone call recordings, group and online meeting recordings, emails and chat conversations.
Technical identification data	An identifier defined by the device or app that allows us to identify you. If necessary, we will use additional information for this.

4.2. 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 are not yet our customer, and we have not yet concluded a loan agreement with you. Below, you can see what data we typically process.

Personal data categories that pertain to potential customers

Personal data category	Data content of the category
Basic data	Your basic information, including: · name · personal identity code · contact details such as address, telephone number and email address.
Due diligence information	Information specified in the legislation that we need to verify your identity or country of tax residence and determine your financial position and political exposure.
Customer relationship data	Data that identifies your customer relationship, such as the start date and nature of the customer relationship.
Agreement and product data	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 through cookies and other equivalent technologies)	We track your online behaviour and use of services through cookies, for example. The data collected may include: · the page you are browsing · your device model · unique device or cookie identifier · the channel you are using (app, mobile browser or web browser) · your browser version · the location of your web or mobile device · your IP address · session ID, session time and duration · your screen resolution and operating system.

Personal data category	Data content of the category
Recordings and their content	Recordings and messages in various formats where you are one of the parties, such as telephone call recordings, group and online meeting recordings, and emails.
Technical identification data	An identifier defined by the device or app that allows us to identify you. If necessary, we will use additional information for this.

4.3. Legal basis for the processing of personal data

We process your personal data based on different legal grounds in different activities. We only collect as much personal data about you as is necessary for each activity. Below you will find examples of processing activities and their legal basis.

Legal bases for processing

Legal basis	Example
Execution of an agreement or actions taken before concluding an agreement	· providing banking and investment services · providing digital banking services · providing a strong electronic identification service · SMS confirmation, which is used in connection with identification of additional payment confirmation, for example · opening an account or card · providing mobile payment services · granting a credit · payment orders · list of trusted payees · customer service during the customer relationship, such as customer support · management of your customer relationship · automated decision-making

Legal basis	Example
Statutory obligation	· preventing and detecting money laundering and terrorist financing · sanctions checks · residence permit supervision · determining the beneficiaries of a decedent's estate · provision of a withdrawal service · accounting · reporting to tax, police, executive and supervisory authorities · disclosure of data to the positive credit register · obligations concerning credit institution, mortgage bank and investment service operations · obligations related to risk management, such as credit risks and capital adequacy requirements · obligations related to payment services, such as fraud monitoring and reporting · verifying the payee's details · obligations related to securities, funds, collateral and loans. · statutory customer communications

Legal basis	Example
Legitimate interest of the data controller or a third party The legitimate interest of the data controller is usually based on a customer relationship or a similar relationship between the data controller (us) and the data subject (you). We ensure that such processing is proportionate to your interests and meets your reasonable expectations.	· risk management and risk modelling · assurance of the safety of services and investigation of misconduct · preparing, filing or defending a legal claim and a debt recovery procedure · camera surveillance at branches · transfer of personal data to service providers to the extent permitted by regulations · marketing, product and customer analyses to improve our product range and the services we offer to you · contacting you after a customer survey · conducting customer research to support customer-driven business development · profiling, for example to provide you with tailored services or to assess your ability to pay and potential credit risk · business, process and system development and testing · acquisition of funds · use of statistical data as part of media work · training purposes · in the event of death, we will provide SOK Corporation with information to terminate the cooperative membership, the payment address for the membership fee to be refunded, and, if necessary, the death estate documents related to the termination of the cooperative membership (the deed of estate inventory and the letter of attorney)
Consent	· electronic direct marketing and the targeting of marketing via email, SMS and S-mobiili notification messages · provided consent to targeting on external channels (Google, Meta, other services) · marketing based on cookie choices and content targeting at s-pankki.fi and on external websites · We may combine information collected through cookies with other information we have collected about you when you log in to online banking or S-mobiili · collecting location data from your web or mobile device so that we can tell you the location of our nearest branch, for example · automated decision-making · information that you are a student and the provision of student services to you

4.4. Profiling and automated decision-making

At S-Bank, we carry out customer profiling and use automated decision-making. Decisions are made automatically with your consent or to fulfill the terms of an agreement.

Profiling means that we evaluate certain personal characteristics related to you through automated processing of personal data. For example, we 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. In addition, profiling helps to target marketing and content so that we can recommend products or services that are just right for you. We also use profiling to prevent money laundering and terrorist financing, as well as to identify misconduct and risks of misconduct.

You may object to S-Bank's legitimate interest in using your data for profiling related to recommendations and marketing. You can request a profiling ban by contacting our customer service.

Automated decision-making is a process where a human person does not participate in the decision-making, but decisions are made by the system which processes and analyses the data. If a product or service you purchase involves such automated decision-making, we will let you know about it when you are purchasing the product or service in question. You can also ask us to review the decision and make a manual decision if you wish. Through automated decision-making, we ensure that decisions are of consistent quality. We regularly review our decision-making methods to ensure they are fair, efficient and equitable.

We automatically make decisions related to loans and payment cards. 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. In the decision-making process, we use profiling to assess your creditworthiness and ability to repay. These are also assessed during a credit relationship by monitoring the repayment of the credit, for example. Automated decision-making also protects your interests. Such a situation may be a suspected payment card abuse, for example. We also use automated decision-making in accordance with the terms and conditions of the agreement. If the entitlement to a certain feature expires, we may block the use of the payment card. This may be the case when a benefit programme ends, for example.

4.5. 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. 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.

As a bank, we have a legal obligation to know our customers, and we must comply with international sanctions. We may, therefore, use your personal data to determine whether you are subject to international sanctions or freeze orders.

We may process your personal data if it is necessary for the prevention and investigation of crimes or suspected crimes directly related to our credit institution activities. We may disclose your personal data to authorities, such as the police, where required for the prevention or investigation of criminal offences.

5. Personal data recipients and recipient categories

Recipient means another data controller, joint controller or processor to whom the personal data is transferred or disclosed.

The disclosure of personal data may mean a situation in which we disclose your personal data to another data controller, for example.

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 data to the Finnish Tax Administration among other things for reporting purposes in accordance with FATCA and CRS/DAC2 obligations. We provide the Tax Administration with annual reports on our customers, for example.

We are also under a legal obligation to disclose to the positive credit register the details of all credits that we have granted to private individuals. The Act on the Positive Credit Register specifies the purposes for which the data collected in the register can be used and disclosed.

Your data may also be disclosed as follows:

- Within S-Bank Group for the purposes of customer service, customer relationship management or marketing to the extent permitted by law.
- To transaction services relying on electronic identification when S-Bank offers an intermediary service for strong electronic identification.
- To payment service providers when they need to verify the payee's (your) information
- To service providers, account information service providers and payment service providers so that we can implement a transfer of funds in payment services (e.g. a bank transfer).
- To international card companies and other parties relevant to payment transactions, such as merchants and mobile payment service providers.
- To authorities such as the Social Insurance Institution Kela, Statistics Finland, and 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).
- To an insurance company when S-Bank acts as an agent of the insurance company.
- To joint registers of banks and insurance companies so that we can combat crime against banks and insurance companies.
- Outside the S-Bank Group when we take legal action together with a debt collection agency, acquisition of funds, transfer of assets or other business partner, for example.
- With your consent, to our partners when we offer you a product or service in cooperation with our partner.
- To another party to a jointly owned or used product or service. This could be a joint account or joint and several credit, for example.
- 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 11 of this statement).

5.1 Transfer of personal data

The transfer of personal data means a situation in which we transfer your personal data to a data processor acting on behalf of S-Bank, such as a subcontractor.

We use subcontractors to provide our services and in other bank activities. We transfer personal data to subcontractors only to the extent necessary for the services they provide. The subcontractors process the data on behalf of the bank. Some of the subcontractors we use are other S Group entities. Among other things, they provide us with IT and other support services.

Personal data is only transferred to a limited extent outside the European Union and the European Economic Area When data is transferred to third countries, we use standard contractual clauses issued by the EU Commission or another transfer mechanism allowed by legislation. You can read more about the standard contractual clauses on the EU Commission's website: **https://commission.europa.eu/publications/publications-standard-contractual-clauses-sccs_en**.

6. Personal data retention time and criteria for determining the retention time

We process your personal data during the validity of the contractual relationship or as long as required by the 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. We may also retain your data after the end of the customer relationship based on our legitimate interest.

The retention period for personal data is usually the duration of the customer relationship plus 10 years after its end. 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 time when we were in contact with you or established a potential customer relationship for you.

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

7. Sources and updating of personal data

We collect your personal data primarily from you. We collect data when you use some of our services, such as online or mobile services, or when you interact with us by phone. We also collect your data through cookies when you use our websites or S-Mobile. If you log in to online banking or S-Mobile, we may combine information collected through cookies with other information we have collected about you.

We may also obtain your personal data from your representatives to the extent permitted by law. The representative may be the guardian of a minor or a court-appointed public guardian, for example.

We may also receive your personal data from other persons or legal entities when we prepare clarifications on the origin of funds or receive a deed of gift, will or documents of a deceased person's estate, for example.

We may obtain your personal data, within the limits permitted by law, from within S-Bank Group in order to fulfil our statutory obligations and for risk management purposes, as well as for the purposes of customer service, customer relationship management or marketing.

In addition, we can collect and update your personal data as permitted by legislation from registers of third parties such as the Population Information System, the Trade Register and other public authority registers, and from data controllers of credit data registers. We collect information related to your consumer credit 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 whether you are subject to international sanctions from a third party database.

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 11 of this statement).

8. 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 free of charge. If you want to get more than one copy, we may charge you a reasonable administrative fee.

We will use a common electronic format to inform you about the personal data being processed. We need to be able to send this information securely, which is why we always send a copy in electronic format to S-Bank's netbank or through another electronic channel where you can authenticate yourself using strong authentication. You can also ask us to send you the information by post.

You also have the right to request that we rectify or erase your personal data. The right to the erasure of data is very limited in banking, as we have a legal obligation to retain your personal data.

In certain situations, you also have the right to request the restriction of the processing of your personal data or to object to the processing of personal data that is based on S-Bank's legitimate interest. For example, if you no longer wish to receive invitations to customer surveys, you can opt out of survey invitations by updating your customer information. Similarly, you can opt out of analytics if you do not want us to use your data for financial reviews or other customer analyses.

In addition, you can ask us to transfer the data provided by you in a machine-readable format to another data controller.

If you would like to exercise your rights, please send a request with a message in the online bank, call us at +358 10 76 5800 (local/mobile network charge) or visit our branch. 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.

Contact details of the Data Protection Ombudsman:

Postal address: P.O. Box 800, FI-00531 Helsinki
Switchboard: +358 29 566 6700
Email: **tietosuoja@om.fi**

9. Right to withdraw consent

If we process your personal data based on consent, you have the right to withdraw your consent. The withdrawal of consent only affects the lawfulness of processing based on consent. The withdrawal of consent may affect the functionalities and usability of the service.

Based on your consent, we process your history of the use of services, that is, your digital footprint. It is used for statistics and the development of services. If you do not want us to use your personal data for such analytics, you can withdraw your consent in S-mobiili and in the cookie settings of the **s-pankki.fi** website.

If you do not wish to receive any advertising from us, you may withdraw your consent to this. You can also give and remove your consent and prohibition in the online bank, the S-mobiili app, the Oma S-kanava service at **www.s-kanava.fi** or via the link in the email you have received.

10. Protection of the register

We protect personal data throughout its life cycle. We use appropriate technical and organisational measures of protection to prevent the loss, unauthorised use, 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 is processed only by those of our employees whose duties include the processing. All persons processing personal data are bound by bank confidentiality and a non-disclosure obligation. We also require that our subcontractors protect and process personal data in an appropriate and careful manner. 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 breach of personal data security. We will inform the required authorities and the data subjects of any data security breach in compliance with legal requirements.

11. Data protection regarding the joint controller arrangement for SOK's and S-Bank's shared customer data

11.1. 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 the joint 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.

The joint task of S Group and S-Bank is to produce benefits and services for their customers. With the help of the joint register, we can produce and develop these benefits and services so that you get the most benefits from your customer relationship with both the retail business and the bank. With the aid of the joint register, we are also developing S Group's and S-Bank's joint mobile application S-mobiili, making it even better. With the joint register, we want to make it as easy as possible for you to maintain the data related to your customer relationship and to manage the consents in the joint register.

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 joined as a co-op member in the "Child's banking" online service
- Customers who have signed an agreement to activate S-mobiili.

11.2. Processing of personal data in the joint register

Below is a list of data that S-Bank and SOK process for their joint purposes. Here you can see the purpose for which the data is processed and on what basis, as well as the retention period of the data.

Please note that personal data is processed independently for separate purposes in SOK's co-op member and customer register and S-Bank's customer register (the parent registers). The data retention periods for the parent registers may differ from the retention periods in the table below.

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Legal bases for processing

Data	Purpose	Data retention period in the joint register*	Legal basis
Basic data about a person: · name · personal identity code · date of birth · language · date of death	Maintaining and updating data so that we can provide customer and personnel benefits.	As long as the customer is in the joint register as described in paragraph 1.	Agreement.
Contact details · permanent and temporary postal address · mobile phone number and other phone number · email address	Data maintenance and updates so that we can provide customer 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).	For us to be able to provide the Become a co-op member online service.	Six months after you have become as a co-op member.	Agreement.
Information on becoming a customer in the Child's Banking Services.	Enabling the addition of a minor to the co-op member household as part of the service for opening S-Bank's services and products.	6 months from the addition to the co-op member household in the service.	Agreement.

Data	Purpose	Data retention period in the joint register*	Legal basis
Digital footprint of the Become a co-op member online service (processing within the joint controller arrangement and disclosure to the customer registers of S-Bank and SOK).	Improving the customer experience and developing the Become a co-op member online service.	37 months. However, no longer than for as long as the consent remains valid.	Consent.
Information about the joining benefit offered by S-Bank.	For us to be able to report and produce mutual benefits.	As long as the customer is in the joint register. However, up to 18 months from joining.	Legitimate interest.
Employee data: information about being an employee and 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.
The co-op membership household to which the customer belongs, information on the customer's role in the membership household, the period of validity of the membership household and the member/transaction number.	Data maintenance and updates so that we can provide co-op member and employee benefits. Data maintenance and updates so that we can improve the customer experience and develop our business.	As long as the customer is in the joint register.	Agreement. Legitimate interest.
Benefits payment account: the account number of the account to which the benefits are paid.	For us to be able to maintain and update the data and provide co-op member and employee benefits.	As long as the customer is in the joint register.	Agreement.

Data	Purpose	Data retention period in the joint register*	Legal basis
S-Etukortti Visa, S-Bank Private Visa, S-Etukortti Debit: card type, card expiration date and information about the co-op membership based on which the card has been ordered.	For us to be able to produce S-Etukortti Visa cards with customer information. For us to be able to investigate situations related to co-op member benefits.	As long as the customer is in the joint register.	Agreement.
Consent and prohibition data: including direct marketing prohibition, email marketing consent, mobile marketing consent, provided consent to targeting on external channels (Google, Meta, other services), telephone marketing prohibition, research survey prohibition, as well as prohibition data from the Robinson restriction service provided by Suomen Asiakkuusmarkkinointiliitto ry, addressed direct mail prohibition, customer notification prohibition and order of non-disclosure prohibition.	For us to be able to maintain and update the data.	As long as the customer is in the joint register.	Legitimate interest.
Information about whether you have activated S-mobiili.	For us to be able to provide the S-mobiili service.	As long as the S-mobiili agreement is valid.	Agreement.

Data	Purpose	Data retention period in the joint register*	Legal basis
Advertising identifier collected from the mobile device for the purpose of identifying the device.	In order to maintain and update the data.	As long as the consent is valid.	Consent.
S-mobiili consents: i.e. consent to the use of location data, to receiving notifications and to collecting digital footprint.	For us to be able to maintain and update the data, target marketing, content and bulletins, improve the customer experience, and develop our business.	As long as the consent is valid. However, no longer than the S-mobiili agreement is valid.	Legitimate interest.
Customer feedback given in S-mobiili.	For us to be able to improve the S-mobiili app and respond 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).	For us to be able to improve the customer experience, group customers based on the use of S-mobiili, target marketing communications and develop S-mobiili.	37 months However, no longer than the consent or S-mobiili agreement is valid.	Consent.
S-mobiili user interface choices made by the customer.	For us to be able to personalise the user interface of the S-mobiili app.	The validity period of the selection. However, no longer than the S-mobiili agreement is valid.	Agreement.
Information that the customer has marked a benefit as their favourite or removing it from their favourites.	For us to be able to personalise the user interface of the S-mobiili app, improve the customer experience, target content and develop S-mobiili.	The validity period of the selection. However, no longer than the S-mobiili agreement is valid.	Agreement.

Data	Purpose	Data retention period in the joint register*	Legal basis
Customer groupings based on the use of S-mobiili.	For us to be able to recommend and personalise benefits and services, personalise the user interface of the S-mobiili app, improve the customer experience, target content and develop S-mobiili.	5 years. However, no longer than the S-mobiili agreement is valid.	Legitimate interest.
Mobile payment service activation data.	For us to be able to maintain and update the data and provide co-op member and employee benefits.	As long as the customer is in the joint register, and the service is active.	Agreement.
Information on whether you have activated the mobile S-Etukortti Card.	For us to be able to maintain and update the data and provide co-op member and employee benefits.	As long as the customer is in the joint register, and the service has been activated.	Agreement.
Information on interactions with S-Bank's telephone service where the contact concerned a co-op member matter. The exact content of the call is not included in the joint controller register.	Providing smooth and efficient customer service.	7 years.	Legitimate interest.
Information about student status.	For us to be able to maintain and update the information.	As long as the information is valid. However, only for as long as the customer remains in the joint registry.	Legitimate interest.

*After removing from the joint register, some of the personal data can also be retained in SOK's co-op member register and customer register as well as S-Bank's customer register in accordance with the purpose of the register and the basis of processing. Retention periods are described in register privacy statements.

11.3. Personal data recipients and recipient categories

In the table above, you can see how we transfer personal data from the joint register between S Group's co-op member and customer register and S Bank's customer register.

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. If customer data needs to be transferred outside the EU/EEA countries, we ensure of the lawfulness of the data transfer. The transfer may be necessary for the technical implementation of the processing of personal data, for example.

11.4. Rights of the data subject of the joint register

If you wish to exercise your rights for the joint data, you can turn to either data controller. We recommend that you contact the data controller relevant to the exercise of your rights. That is, for matters related to the customer relationship with SOK, you can contact SOK and, in the case of banking, S-Bank.

If you do not want us to process your personal data for advertising purposes, you can withdraw your consent to this. You can also choose to set a marketing prohibition on your S user account and in S-mobiili, or ask our customer service to change your consent and prohibition information. As a result, your S-mobiili content, for example, may be less personalised, and we may be unable to send you targeted newsletters or advertising in the best possible way.

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.

11.5. 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**