

DATA PRIVACY STATEMENT

1. WHAT IS PERSONAL DATA AND WHO IS RESPONSIBLE FOR IT?

Personal data is any type of information concerning an identified or identifiable person, i.e. data that refers to a physical person, such as name, address, e-mail address, telephone number, national identity number, salary details, tax matters, account number, and engagement and credit information. This also applies to personal data concerning the owner of a sole proprietorship, but not information concerning companies, with the exception of information concerning companies' employees.

SG Finans AS is the data controller for the processing of personal data received concerning and from customers and business partners (hereinafter referred to a customer).

2. RULES CONCERNING SG FINANS AS' PROCESSING OF PERSONAL DATA

The EU General Data Protection Regulation (**GDPR**) with regulations governs SG Finans AS' access to process personal data. On this basis, SG Finans AS has drawn up detailed personal data protection regulations. These regulations supplement the other terms of agreement which SG Finans AS has entered into with the customer, and apply to all present and future service relationships.

Personal data is any information concerning an identified or identifiable physical person, including sole proprietorships.

In the absence of any other legal basis, SG Finans AS' processing will be based on the customer's voluntary, express and informed consent. Consent is not necessary, for example, concerning personal data which is registered and used to execute an agreement or perform a transaction requested by the customer, or to fulfil a legal obligation held by SG Finans AS, or which is necessary for purposes related to legitimate interests, unless precedence is taken by other interests or fundamental rights and freedoms, of which the purpose is to be safety measures to prevent fraud, money laundering, financing of terrorism or other criminal acts, or for identification, control of credit information, handling of non-performing exposures, and customer follow-up.

3. PURPOSE OF PROCESSING

The purpose of SG Finans AS' processing of personal data is, in the first instance, customer administration, invoicing and fulfilment of the obligations undertaken by SG Finans AS for the execution of transactions and service agreements with the customer. SG Finans AS will process personal data to the extent required by legislation or to which it gives access, or when the customer has consented to such processing.

Other than this, personal data is processed for e.g. the following purposes:

- Customer follow-up and marketing (see clause 8)
- Risk classification of customers and credit portfolios (see clause 9)
- Prevention and discovery of criminal acts (see clause 10)

In addition, we process your data when required on the basis of a legitimate interest of SG Finans – for example to prevent misuse and losses, strengthen IT and payment security and/or for direct marketing purposes.

4. INFORMATION CONCERNING PROCESSING AND RIGHT OF ACCESS TO INFORMATION

In the following regulations, SG Finans AS provides general information concerning its processing of personal data.

The customer may submit a written request to SG Finans AS for access to registered personal data, a description of the type of data that is processed, and more detailed information concerning SG Finans' processing of the data.

5. DATA PROTECTION OFFICER (DPO)

SG Finans AS has designated a data protection officer (DPO), even though this is not a statutory requirement. The DPO will be SG Finans AS' representative and contact in all matters relating to GDPR and personal data.

DPO may be contacted concerning all matters relating to GDPR, including requests for access to information, correction, deletion or data portability concerning SG Finans AS in Norway, Sweden, Denmark and Finland. DPO can be contacted at: dpo@sqfinans.no.

6. PERSONAL DATA OBTAINED BY SG FINANS AS

As a general rule, personal data will be obtained by SG Finans AS directly from the customer or through a business partner, at the customer's request in conjunction with financing. On the collection of data from third parties (such as from other banks/finance companies, credit data agencies or public authorities), if this is a statutory requirement the customer will be notified, unless such notification is impossible or disproportionately difficult, or it is evident that the customer is already familiar with the information which the notification is to contain.

If SG Finans AS wishes to obtain data from the customer which is not necessary to safeguard the contractual relationship or for other statutory processing purposes, before obtaining the information SG Finans AS must first inform the customer that disclosure of the data is voluntary, and what the data will be used for (i.e. the purpose of the processing).

7. PERSONAL DATA REGISTERED BY SG FINANS AS

On the establishment of the agreement and during the course of the contractual relationship, SG Finans AS will register data concerning the customer and other persons associated with the contractual relationship, such as employees, surety providers, guarantors and debtors, as well as actual rights holders. SG Finans AS will also register data concerning persons with whom SG Finans AS has refused to enter into an agreement, in order to be able to inform the person concerned of the refusal, and to possibly subsequently be able to document this matter, including that financing was refused on objective grounds.

As a general rule, SG Finans AS will not process special categories of personal data concerning the customer. However, SG Finans AS may, for example, process genetic data and biometric data in order to clearly identify a physical person, provided that this person has given their express consent to the processing of such personal data.

8. ISSUE OF PERSONAL DATA

Registered personal data will be issued to public authorities and other third parties when this is stipulated under a statutory duty of disclosure or right of disclosure. If this is permitted by legislation and is not impeded by SG Finans AS' duty of secrecy, personal data may also be issued to other banks and finance companies, as well as to business partners, for use according to the purposes stipulated for the processing. The transfer of personal data to SG Finans AS' data processors will not be considered to be the issue of the data.

SG Finans AS will also issue personal data to other companies in the Group or consolidated Group, if this issue is necessary in order to fulfil Group-based management, control and/or reporting requirements stipulated by law, or in accordance with the law. It is assumed that the processing of personal data is subject to a duty of secrecy in the company to which the data is issued.

On transacting a payment to or from abroad, the related personal data will be issued to the foreign bank and/or its correspondent bank. The legislation of the receiving country will govern the extent to which such personal data will be issued to public authorities or control bodies, for example to observe the receiving country's tax and duty legislation and measures to prevent money laundering and the financing of terrorism.

9. GROUP CUSTOMER REGISTER

SG Finans AS cooperates with other companies within the same consolidated Group and may have a shared customer register. The purpose of the Group customer register is to administrate the customer relationship and coordinate offers of services and advice from the various companies in the Group.

The Group customer register will include data concerning the customer's identity such as name, date of birth, address and contact details, details of in which company in the Group the person concerned is a customer, and which services and products the agreement with the customer concerns. National identity number and financial details may be issued to and registered in the joint Group customer register when the purpose is the administration of the customer relationship, risk management and other monitoring, in order to fulfil statutory requirements and Group regulations.

10. CUSTOMER FOLLOW-UP AND MARKETING

SG Finans AS will inform the customer about products within the product categories for which an agreement already exists between the customer and SG Finans AS. SG Finans AS' products are divided into the following categories:

- Leasing, loans and other credits
- Factoring

Without the consent of the customer, SG Finans AS will be able to use the following data for customer follow-up and marketing: the customer's name, contact details and date of birth, and the services and products for which the customer has entered into an agreement. SG Finans AS may possibly be able to obtain this data from a shared Group customer register.

If products and services are marketed within another product category than the category agreed between SG Finans AS and the customer (see the first section), the customer's consent will be required in order to use other customer data than the data mentioned above. The customer may contact SG Finans AS to request his or her name to be blocked from use for marketing purposes.

11. RISK CLASSIFICATION OF CUSTOMERS AND CREDIT PORTFOLIOS

In accordance with the rules in current legislation, SG Finans AS will process credit data and other personal data on the establishment and use of systems for the calculation of capital requirements for credit risk. Systems for internal measurement methods are SG Finans AS' models, work and decision-making processes for credit granting and credit management, control mechanisms, and IT systems and internal guidelines related to the classification and quantification of the institution's credit risk and other relevant risk.

Personal data for this purpose may be obtained from credit reference agencies.

12. PREVENTION AND DISCOVERY OF CRIMINAL ACTS - MONEY-LAUNDERING NOTIFICATIONS

SG Finans AS will process personal data in order to prevent, discover, investigate and handle fraud and other criminal acts. Data will be obtained from and issued to other banks and financial institutions, the police and other public authorities. The storage time for money-laundering notifications and investigations will be up to ten years after registration.

SG Finans AS will process personal data in order to fulfil the investigation and reporting obligation concerning suspicious transactions under the Norwegian Anti-Money Laundering Act. SG Finans AS is required to report suspicious information and transactions in Norway to ØKOKRIM (the Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime) at the Financial Intelligence Unit (EFE); in Denmark to the State Prosecutor for Serious Economic and International Crime (SØIK); and in Sweden to the Finanspolisen (FIPO).

The customer will not have access to the data which SG Finans AS has registered for these purposes.

13. CORRECTION AND DELETION

SG Finans AS will delete or anonymise registered personal data when the purpose of the individual data processing has been fulfilled, unless the data must or may be retained after this, as prescribed in legislation. Within the limitations set in GDPR and other regulations, the customer may require insufficient and unnecessary personal data to be corrected or deleted.

14. COMPLAINTS

If you believe that SG Finans AS has not acted in accordance with its rights under GDPR, you are entitled to complain to the relevant supervisory authority. You can do this by sending a complaint to the relevant data protection agency. Contact details are available at: www.datatilsynet.no (Norway), www.datatilsynet.dk (Denmark) and www.datainspektionen.se (Sweden).