

# Our data protection declaration

Our processing of your personal data will accord with Norwegian data protection legislation. All employees of the bank have a duty of confidentiality, and we apply strict requirements for data security when storing and using your personal data.

More information on the way we treat your personal data and how we protect your privacy is provided below.

If you have questions about your data privacy, contact our data protection officer/adviser.

## Data controller

We are the data controller for the personal data we process about you in relation to our services. We may also process your personal details on behalf of other product companies which you have an agreement/agreements with through us. In these cases, we will be the data controller on behalf of the companies concerned. These could be, for example, Eika Forsikring, Eika Kapitalforvaltning, Eika Kredittbank or Eika Boligkreditt. These companies will be the data controller for your personal data related to the agreements you have with them. Go [here](#) for the data protection declarations from the product companies in Eika, as well as the contact details for each company. If you want to put a question directly to Eika Boligkreditt, this can be done by e-mail to [personvern.ebk@eika.no](mailto:personvern.ebk@eika.no)

## What personal data do we process?

We process the following categories of personal data:

- identity information, such as name, national ID number and copies of proof of identity
- contact information, such as phone number, address and e-mail address
- information needed to enter into an agreement with you, such as financial position, family status, etc
- financial and agreement information, transaction data and credit history
- information for carrying out statutory duties, such as money laundering checks and reporting to public bodies
- special categories of personal data, such as union membership for certain loan products
- data related to customer contacts, such as time, content and plan for follow-up.

## Where do we get personal data from?

### Information from you

We will process personal data you provide us with in an application form, for example, when using payment services or other electronic solutions, when visiting our website or when contacting our call centre or other parts of the business. This applies when you are a private customer or have a role in a company, organisation, society and so forth.

### Third parties

We will acquire personal data from third parties in order to provide our services. Types of information sources could include:

- public bodies and registers such as the Norwegian Tax Administration, the Norwegian Population Register, the Brønnøysund Register Centre and the land registry.
- other Eika companies
- partners
- payment service providers and others in order to make payments – banks, transferrers and shops
- credit reporting agencies
- debt registry
- other enterprises supplying personal data for use in marketing, for example
- open sources.

### **CCTV and sound recordings**

We capture images from CCTV of bank premises and self-service facilities (mini-banks and ATMs) with the aim of preventing and identifying criminal activity.

We may also record telephone conversations. Advance notification of this will be given.

## **Why do we process data about you?**

Our primary purposes in processing personal data are customer administration, financial advice, invoicing, and providing banking and financial services in accordance with the agreements we have entered into with you or with an enterprise where you have a role. We will otherwise process personal data to the extent that legislation requires or permits us to do, or where you have consented to such processing. We can also process personal data if this is necessary to meet our legitimate requirements.

We will process your personal data for the following purposes.

- Customer administration, invoicing and implementation of banking and financial services, payment assignments and so forth by agreement with you.
- Credit assessments and fulfilment of other requirements pursuant to the Financial Contracts Act and the Financial Institutions Act. Data here could be obtained from credit reporting agencies, when you will be informed that a credit assessment has been made.
- Management and control of our operations.
- Analysis and statistics:
  - for improving our existing products or developing new services
  - providing you with more relevant advice on and offers of our products and services
  - in order to have an insight into our customer portfolio and its development and profitability.
- Marketing.
- Risk classification of customers and credit portfolios.
  - Pursuant in part to the Financial Institutions Act, we will process credit information and other personal data in connection with the establishment and use of systems for calculating capital requirements for credit risk and other relevant risks.
- Prevention and identification of criminal acts.
  - We will process personal information with the purpose of preventing, identifying, investigating and dealing with fraud and other illegal activities directed at you, other customers or us. Information acquired for this purpose could also be obtained from and passed to other banks and financial institutions, the police, and other government authorities. We are subject to a duty to investigate and report suspicious transactions pursuant to money laundering regulations, and to report suspicious information and

transactions to the National Authority for Investigation and Prosecution of Economic and Environmental Crime in Norway (Økokrim).

- Disclosing and sharing personal data as required by law, where you have consented to this or where we have a legitimate interest in doing so. Further details on when we can disclose are provided below.
- Customer authentication when using electronic services.
  - When you make use of our electronic services, we can register your user behaviour and environment, as well as departures from these, identify the computer or mobile unit you utilise to access bank services, the condition of the computer/unit and so forth. We apply this information to check that you are the right customer using the relevant service. We can also use the information in a risk assessment to adjust the authentication method to be used for the service.
- Taking care of our own security and that of our customers.

## Grounds for using your personal data

### Fulfil agreements

The purpose of processing the personal data is to fulfil the agreements we have with you.

### Legal obligations

We will process personal data to fulfil our legal obligations. Examples of these include:

- regulations related to preventing and identifying criminal activities
- regulations related to sanctions
- regulations related to managing, checking and reporting to the authorities
- accounting requirements
- requirements and obligations related to credit and payment services
- other obligations related to service- or product-specific legislation.

### Consent

In certain cases, we ask you for your consent to process personal data – for analysis and marketing purposes, for example. The consent contains information about the processing activity. If you have consented to the processing of your personal data, you can withdraw your consent at any time. You can manage your consents via our mobile and online bank or our website.

### Legitimate interest

We can process personal data if this is necessary to take care of a legitimate interest which outweighs concern for the individual's privacy. The legitimate interest must be legal, predefined, genuine and objectively justified in our operations.

Examples of possible legitimate interests include analysing your customer data in order to provide you with relevant advice and offers, improve our existing products, acquire insight into our customer portfolio, and secure evidence.

# Cookies on the website

## What is a cookie?

A cookie is a small file placed on your computer or unit by the web browser. A given cookie is implemented and linked to a specific website and allows the site to recognise traffic from a given browser while logged on, for example, for a session (session cookie) or over time (persistent cookie).

These files are used, for example, to see if you have visited the site earlier, to provide technical information about your operating system and to analyse the general user pattern on the site.

By using our website, you are considered to consent to the use of cookies as described below.

## Why do we use cookies?

Our purpose in using cookies is to

- secure user insight, measure traffic and check tracking functionality for use in analyses so that we can improve our website, its content and the user experience
- be able to adapt the content so that it is as relevant as possible to you
- be able to provide you with relevant and tailored marketing on other sites you visit.

In addition, we use cookies to handle secure log-in to our solutions.

## Which cookies to we use, and why

### • The website's own cookies

Our websites are built with the aid of a publishing platform. This places persistent cookies for statistical and personalisation purposes, as well as session cookies to handle the logged-in user experience and security. When you log in to our services, we will be able to use both your previous web behaviour and data linked to you as an identified customer in order to deliver the most relevant content possible.

### • Cookies from commercial third-party players

We utilise certain suitable third-party services which place their own cookies.

We use the Google Analytics tool to

- identify unique users
- remember the number and time of earlier visits
- find out where users come from
- determine the start and finish of a visit.

This information, which is transmitted to Google, cannot be used to identify you as a person. Among other moves, your IP address is masked before being processed by Google.

The New Relic analysis tool is used to monitor the performance experienced on the website, and helps us to optimise our own solutions in order to ensure good service quality.

We also utilise services for remarketing, which permits tailored marketing in other channels and websites. The suppliers used are Google and Facebook. These services operate with their own cookies, but they record no personal data on the website and the data are anonymised.

The services described above permit

- frequency management of advertising on the basis of activity

- user behaviour on the website being viewed in relation to the direct advertising presented
- information on product interests in order to present more relevant advertising
- targeted advertising for selected customer groups.

The above-mentioned third-party services are deactivated when you log into our services. This is done for security reasons.

### **Must I accept cookies?**

No, this is up to you. If you want, you can block cookies and erase ones already registered in your web browser.

Refusing to accept cookies means that you may find our website fails to function as it should. The content of the site could be perceived as less relevant, since we will be unable to tailor it for you. Nor will you be able to use our online or mobile banks.

To deregister for tracking and remarketing by third parties, visit these sites for instructions.

- Google Analytics
- Google Chrome
- Facebook Help and Facebook Ads.

## **Disclosure of personal data**

Your personal data will be disclosed to government authorities and other external parties when this is required by a legal duty or right of disclosure. If legislation permits, and our duty of confidentiality does not prevent it, your personal data could also be disclosed to other banks and financial institutions as well as to partners for use within the purposes specified for the processing.

Transfer of personal data to our computer processing staff is not regarded as disclosure.

In cases where legal duties exist, we may disclose personal data to the tax authorities, for example, the debt register and other financial institutions to combat criminal activity, as well as for implementing payment transactions, customer assignments and settlements. We can also share personal data with other Eika businesses for the purpose of customer administration, management and control, reporting and marketing. When performing payment transactions to or from abroad, the associated personal data will be delivered to foreign banks and/or their assistants.

We also have a duty to disclose information where you have entered into agreements on payment services related to your account with another payment service provider (third-party services related to payment authorisations and account information). **We have no responsibility for what the other payment service provider does, and the latter is the data controller for your personal data under the relevant agreement.**

## **Use of data processors**

We use data processors to acquire, store and carry out other processing of personal data on our behalf. In such cases, we will enter into agreements with and monitor these processors to ensure that their processing of the data accords with the data protection regulations and our requirements for processing personal data.

Should it be relevant to process personal data in countries outside the EU/EEA, the data protection regulations specify special requirements for this which will be followed up.

## **Storage time**

Storing personal data represents a processing which requires a legal basis.

We will store your personal data in accordance with the prevailing processing grounds. When these grounds cease to exist, the data will be erased or anonymised. Storage time in our various systems will vary, depending on the purpose of and utilisation in that system. Stored personal data could thereby be erased in one system but still be available in another with a different purpose. This also means that system access is managed in such a way that stored personal data are not available to or used for other purposes than the processing grounds permit.

We will, for example, be able to store information on agreements and other conditions in order to be able to document customer treatment and defend a legal claim until the statutory limitation period has expired. If our processing ground is your consent, however, the data will be erased or anonymised if you withdraw your consent unless we have other legal grounds to store the information for another purpose.

## **Protection of your personal data**

We utilise suitable technical, organisational and administrative safety measures to protect your personal data against loss, misuse, unintentional access, disclosure, amendment or destruction.

## **Your rights when we process your personal data**

You have the right to request access to, correction of or deletion of the personal data we process about you. Furthermore, you have the right to request restricted processing, object to the processing and require data portability.

To exercise your rights, you must contact our data protection officer/adviser. We will respond to your request as quickly as possible and within 30 days at the latest.

In order to respond to your request, we will ask you to confirm your identity or provide further information before we can answer. This is done to make sure that we give access to your personal data only to you, and not to others pretending to be you. This information must be forwarded to us through secure channels. The secure communication service in the online and mobile banks, for example, allows you to send us encrypted e-mails.

### **Access to personal data stored about you**

You can, with a few exceptions, request access to the registered personal data we hold on you.

### **Right to request corrections**

If you discover that the information we hold is incorrect, incomplete or inaccurate, you can request that the incorrect data are corrected without unreasonable delay.

### **Right to request erasure**

You have the right to request that your data be erased or anonymised when they are no longer necessary for their original purpose, or when we have no other processing grounds.

### **Right to restrict processing**

You can require restricted processing if you believe that the personal data we are processing are inaccurate or that we lack the grounds for processing this information. We will then suspend processing until we have investigated your objections.

### **Right to protest**

In those cases where our processing of your personal data is based on our legitimate interests, or the data are being used for direct marketing and profiling in connection with such marketing, you have the right to object to the processing.

### **Right to data portability**

You own the personal data you have given us, and have the right to receive these in a machine-readable format. This right applies to personal data which are processed automatically and are based on a consent from or agreement with you. You can personally request information we have stored about you, and which you have a right to receive via data portability, through our online or mobile banks.

### **Manual processing with automated decisions**

We may make use of automated decisions in some cases, such as the giving of credit in our online channels. You will be able to request that such decisions are made manually instead, state your views or dispute a decision based on automated processing – including profiling – if such a decision has legal consequences or affects you significantly in some other way.

## **Complaints**

If you have questions about our processing of your personal data or wish to complain about this, you can contact our data protection officer/adviser. Possible complaints about our processing of your personal data about you can also be made to the Norwegian Data Protection Authority. You can find information about this (in Norwegian only) at [www.datatilsynet.no](http://www.datatilsynet.no).

## **Amendments**

The data protection declaration valid at any given time will be available here on our website.