

## PRIVACY STATEMENT - AVARDA AB

Avarda is committed to protecting your privacy.

This privacy statement aim to give you further details about how we process and secure your justified interest in protecting your personal data and your rights. The privacy statement is a supplement to Avarda's terms and conditions. The processing of personal data within Avarda is regulated by the General Data Protection regulation (EU) 2016/679 ("GDPR").

Avarda provides financial products and services through its affiliated companies, branches and on a cross-border basis in Sweden, Norway, Finland, Germany, and Denmark.

The Privacy Statement applies to customers of Avarda, our suppliers and partners, and to data subjects who have applied for Avarda products or services but have been rejected or have not for other reasons entered a customer relationship with Avarda.

### 1. Definitions

The following definitions apply to the entirety of this privacy statement.

- "Customer"** means a data subject who has entered or is planning to enter a contractual relationship with Avarda.
- "Data Controller"** means Avarda.
- "DPO"** means Data Protection Officer
- "Data Subject"** means any person whose personal data is processed. Data Subjects include, without limitation, Customers, employees, and visitors.
- "Avarda"** means Avarda AB together with its branches and subsidiaries.
- Avarda AB (organisation reg. no. 559310-4967);
  - Branch: Avarda AB, branch Finland (organisation reg. no. 2619111-6)

### 2. Controller's contact details

Avarda has appointed a DPO responsible for monitoring compliance with applicable data protection legislation. You can contact our DPO by sending an email, at [dpo@avarda.se](mailto:dpo@avarda.se).

You can also contact us at the following address.

Type of establishment	Country	Contact details
Headquarter	Sweden	<b>Avarda AB</b> Attn: Data Protection Officer Box 947, 501 10 Borås, Sweden
Branch	Finland	<b>Avarda AB, filial Finland</b> Attn: Data Protection Officer Keskuskatu 6 B, 00100 Helsinki, Finland

### 3. Categories of personal data

In this section, we describe the types of personal data that Avarda processes.

- **Contact and identification data**  
 Avarda processes personal data, such as first and last name, Social Security Number (“SSN”), address, date and place of birth, citizenship, e-mail address, phone number, bank account numbers, copy of government issued ID (passport, drives license), copy of electronic signature or ID, information on personal income, marital status, employment, etc.
- **Financial information**  
 Avarda processes personal data on financial information such as income, credit score, current assets and liabilities, invoice information, transactions, including historical transactions, interests and fees, account number, invoice number, bank account number, bank name etc.
- **Information about your use of Avarda’s services**  
 Avarda processes personal data on the services you use, for example deposits, credits or payment services, including your communication with us in relation to such use, for example questions, complaints, which service(s) and what different functions in these services you have used and how you have used them. This includes information about
- **Technical information generated through your use of Avarda’s services**  
 Avarda processes technical data such as response time for web pages, download errors and date and time when you used the service.
- **Information about your contacts with Avarda’s customer service**  
 Avarda processes recorded phone calls, and email correspondence.
- **Device information**  
 Avarda processes Device ID, IP address, language settings, browser settings, time zone, operating system, platform, screen resolution and similar information about your device and device settings/usage.
- **Information from external sanction lists and PEP lists**  
 Avarda processes sanction lists and lists of persons constituting politically exposed persons (“PEP”) include information such as name, date of birth, place of birth, occupation or position, and the reason why the person is on the list in question.

### 4. What personal data is used for what purposes and with which legal basis?

In this section we describe for the purposes we use your personal data for, the source of the data, and the legal basis for processing.

#### 4.1. Purposes for which your personal data is always used, regardless of the service you use.

Purpose	Type/Source of personal data	Legal basis
To provide you credit and invoice products.	<b>From you:</b> contact and identification data, sensitive personal data,	Processing is based on performance of a contract.

	<p><b>From other sources:</b> information about your financial standing (Avarda and credit information agencies), service-specific personal data,</p>	<p>Information about third parties (such as payment recipient or payer) is based on a balancing of interests . When balancing interests, Avarda has determined that we and you (and also the payment recipient/payer) have a legitimate interest in having these data processed to perform the transactions in question. We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose.</p>
<p>To manage our customer relationship with you in accordance with our agreements, for each service you use.</p>	<p><b>From you:</b> contact and identification data, payment information.</p> <p><b>From other sources:</b> information about your financial standing (credit information agencies), information about your use of Avarda’s services, technical information generated through your use of Avarda’s services, device information, service-specific personal data.</p>	<p>Processing is based on performance of a contract.</p>
<p>To be able to perform customer satisfaction surveys and market surveys, conduct consumer research as well as ask for reviews from you, through email, text messages, phone or via other communication channels. If you do not want us to perform this processing, please contact us to let us know.</p>	<p><b>From you:</b> contact and identification data, information about your use of Avarda’s services.</p> <p><b>From other sources:</b> information about your use of Avarda’s services, technical information generated through your use of Avarda’s services.</p>	<p>Processing is based on balancing of interests. When balancing interests, Avarda has determined that we have a legitimate interest in being able to perform the personal data processing, that the processing is necessary to achieve that purpose, and that our interest outweighs your right not to have your data processed for this purpose. Our interest lies in the fact that it is of great importance to us to be able to conduct market research to understand our customers' needs and how we can improve our products and services.</p>
<p>To ensure network and information security in Avarda’s services.</p>	<p><b>From you:</b> contact and identification data.</p> <p><b>From other sources:</b> information about your use of Avarda’s services, technical information generated through your use of Avarda’s services, device information.</p>	<p>Processing is based on a balancing of interests. When balancing interests, Avarda has determined that we have a legitimate interest in being able to ensure network and information security, that the processing is necessary to realize that purpose, and that our interest outweighs your right not to have your data processed for this purpose. It is also in your interest as a customer that we ensure good information security for our products and services.</p>
<p>To be able to perform risk analysis, prevent fraud, and carry out risk management.</p> <p>We perform the processing to confirm your identity and that the data you provide is correct, as well as to counter criminal activities.</p> <p>We use profiling and automated decision-making for this purpose, to be able to determine the risk of financial crimes.</p>	<p><b>From you:</b> contact and identification data, payment information.</p> <p><b>From other sources:</b> information about your financial standing (credit information agencies), information about your use of Avarda’s services, technical information generated through your use of Avarda’s services, device information.</p>	<p>Processing is based on a balancing of interests. When balancing interests, Avarda has determined that we have a strong interest in being able to prevent crimes, that the processing is necessary to achieve that purpose, and that our interest outweighs your right not to have your data processed for this purpose.</p>
<p>To check and verify your identity.</p>	<p><b>From you:</b> contact and identification data.</p> <p><b>From other sources:</b> information from credit agencies and partners for customer identification.</p>	<p>Processing is based on performance of a contract and on our legal obligation to know your identity.</p>

<p>To anonymize your personal data To anonymize your personal data so that we can conduct analyses on de-identified data, with the purpose of improving our products and services.</p>	<p><b>From you:</b> contact and identification data, payment information.</p> <p><b>From other sources:</b> information about your financial standing (credit information agencies), information about your use of Avarda’s services, technical information generated through your use of Avarda’s services, device information, service-specific personal data.</p>	<p>The processing is based on a balancing of interests. Avarda has determined that we have a legitimate interest in anonymizing your personal data for product development purposes and to analyze customer behavior to improve the service and customer experience. By anonymizing your information, we also ensure that we use personal data to the smallest extent possible.</p>
<p>To perform data analysis to measure and improve our marketing and advertising channels (if possible, we first anonymize the data, which means that no personal data processing is performed thereafter).</p>	<p><b>From you:</b> contact and identification data, payment information.</p> <p><b>From other sources:</b> information about your use of Avarda’s services, technical information generated through your use of Avarda’s services, device information, service-specific personal data.</p>	<p>The processing is based on a balancing of interests. In this assessment, Avarda has determined that we have a legitimate interest in performing data analysis to measure and improve our marketing and advertising media. This processing is necessary to achieve the purpose, and our interest outweighs your right not to have your data processed for this purpose. Avarda's legitimate interest lies in the ability to improve our products and services and to reach more customers.</p>
<p>To share your personal data with the categories of recipients described in section 6 (suppliers and subcontractors, companies within the Avarda Group and authorities).</p>	<p>Varies depending on the recipient (see section 6).</p>	<p>Varies depending on the recipient (see section 6).</p>
<p>To provide marketing materials and offers to you about our current and future products and services.</p> <p>If you do not want to receive marketing from us, please contact us to let us know. We will then stop processing your data for sending marketing.</p>	<p><b>From you:</b> contact and identification data.</p> <p><b>From other sources:</b> information about your use of Avarda’s services.</p>	<p>Processing is based on a balancing of interests . When balancing interests, Avarda has determined that we have a legitimate interest in sending you marketing about our services and offers. We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your data processed for this purpose.</p>
<p>To protect Avarda from legal claims and safeguard Avarda’s legal rights.</p>	<p>All types mentioned in section 2.</p> <p>In the event of a dispute, Avarda may also collect other types of personal data concerning you if we need them to exercise our rights.</p>	<p>The processing is based on a balancing of interests. In this assessment, Avarda has determined that we have a legitimate interest in being able to protect ourselves from legal claims. We ensure that the processing involved is necessary to achieve the purpose, and that our interest outweighs your right not to have your data processed for this purpose.</p>
<p>To share your personal data with the categories of recipients such as credit institutions and other financial institutions.</p>	<p>From you: contact and identification data, sensitive personal data.</p> <p>From other sources: information about your financial standing (Avarda and credit information agencies), service-specific personal data.</p>	<p>Processing is based on performance of a contract.</p>
<p>To prevent Avarda’s operations from being used for money laundering or terrorist financing, by verifying your identity, monitoring and reviewing transactions, conducting risk assessments and creating risk models.</p> <p>This processing constitutes profiling, and a decision that you imply a money laundering risk</p>	<p>From you: contact and identification data, payment information.</p> <p>From other sources: information about your financial standing. (Avarda and credit information agencies), information about your use of Avarda’s services, technical information generated through your use of Avarda’s services, device information, information from external sanction lists and PEP lists (sanction lists and PEP lists), sensitive personal data (information about political opinion, religious beliefs and/or health</p>	<p>Processing is based on a legal requirement (Swedish Law 2017:630 on measures against money laundering and terrorist financing).</p>

constitutes an “automated decision”.	information contained in the PEP lists, as well as biometric information from your ID and picture submitted).	
Filing and accounting in accordance with accounting laws.	From you: contact and identification data, payment information. From other sources: information about your use of Avarda’s services, service-specific personal data.	Processing is based on a legal requirement (Swedish Accounting Act, 1999:1078).
To perform calculations in accordance with rules on capital adequacy obligations.	From you: contact and identification data, payment information. From other sources: information about your financial standing (Avarda and credit information agencies), information about your use of Avarda’s services, device information, service-specific personal data.	Processing is based on a legal requirement (Capital Adequacy Regulation 575/2013, and Capital Adequacy Directive 2013/36)).
To handle any complaints or requests to exercise your rights as outlined in section 8 below.	The personal data processed, depends on the content and scope of the your concerns or requests.	The processing of personal data is based on our legal requirements to adress your requests or concerns.

## 5. Retention of personal data

Avarda will retain your personal information for the period necessary to fulfill the purposes outlined in the tables above unless longer retention is required or permitted by law.

The retention time of your data by Avarda depends on the purpose for which the data is used:

- Personal Data used for the performance of a contractual relationship between you and Avarda is usually retained by Avarda for as long as the agreement is valid and thereafter for a maximum of 10 years due to statutes of limitation.
- Personal data that Avarda must retain under legal requirements, such as money laundering and accounting legislation, is normally saved for 5 and 7 years respectively.
- If no agreement is entered into between you and Avarda or if the data is not necessary for the fulfillment of a legal requirement, the data is only saved as long as it is necessary to fulfill the respective purpose of our processing.
- In some limited cases, the data may need to be retained for longer period of time due to capital adequacy legal requirements that Avarda must comply with.

The legal requirements described above mean that Avarda may not delete your personal data even if you request to have it deleted as described in 8. If we have no legal requirement to keep the data, we must instead make a decision whether we need the data to protect ourselves from legal claims.

Keep in mind that even though we have to keep your data for e.g., legal requirements, this does not mean that your data may also be used by us for purposes other than fulfilling legal requirements.

## 6. Disclosure and transfer of personal data

Your personal data is protected by banking confidentiality, meaning Avarda cannot disclose any personal data to unauthorized individuals.

Before disclosing data to authorized recipients, Avarda ensures adequate measures are taken to guarantee legal and secure handling. This includes agreements on data transfer or data processing with recipients, which cover reasonable contractual, legal, technical, and organizational measures to ensure your data is handled with an adequate level of protection and in compliance with applicable

law. Personal data will be disclosed or transferred to the following third-party recipients authorized as our processors or within the Avarda group for specific purposes.

- **Suppliers, subcontractors and other companies in Avarda Group**

Examples of such suppliers and subcontractors are software and data storage providers, payment service providers and business consultants and other Avarda group companies.

Purpose and legal basis: Avarda needs access to services and functionality from other companies where it cannot perform them itself. Avarda has a legitimate interest in being able to access these services and functionality. Avarda ensures that the processing this entails is necessary to pursue that interest, and that Avarda's interest outweighs your right not to have your information processed for this purpose.

- **Authorities**

Avarda may provide necessary information to authorities such as the police, financial authorities, tax authorities or other authorities and courts of law.

Purpose and legal basis: Personal data is shared with the authority when Avarda is required by law to do so. An example of a legal obligation to provide information is when it is necessary to take measures against money laundering and terrorist financing. Depending on the authority and purpose, the legal bases are the obligation to comply with the law, to fulfil the agreement with you, or Avarda's legitimate interest in protecting itself from crime. Avarda also provides information to the Swedish Tax Agency and various credit registers.

- **Payment service providers and financial institutions**

Payment service providers and financial institutions provide services to you, stores and Avarda to implement and administer electronic payments through a variety of payment methods, such as credit cards and bank-based payment methods such as direct debit and bank transfer.

Purpose and legal basis: Some stores use payment service providers with whom they share your information for managing your payment. In addition, Avarda may share your information with other financial institutions when conducting transactions with your account to complete the transactions. Sharing with payment service providers and financial institutions is performed to make a transaction initiated by you and it is done to fulfil the agreement with you.

- **Fraud prevention agencies and companies providing identity checks**

Your personal data are shared with fraud prevention agencies and companies that provide identity checks.

Purpose and legal basis: Avarda shares your information to verify your identity, the accuracy of the data you have provided, and to combat fraudulent and criminal activities. Avarda shares your information based on Avarda's legitimate interest in conducting its business, as the fraud prevention agencies and the companies providing identity checks have information on fraud activities and identity confirmation which are important for Avarda to use as input to decrease its level of fraudulent transactions. We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose

- **Credit information agencies**

If you apply to use a service from Avarda that involves us providing credit, we will share your personal data with credit information agencies.

Purpose and legal basis: Your personal information is shared with credit information agencies in order to assess your creditworthiness, to confirm your identity and your contact information, and to protect you and other customers from fraud. This data sharing constitutes a credit report. The exchange of data with credit information agencies serves to fulfill legal obligations to conduct creditworthiness checks of customer.

Avarda shares your information based also on Avarda's legitimate interest in conducting its business, as the credit information agencies have information on your financial standing which is important for Avarda to use as input to ensure a correct credit assessment, and not grant credit to consumers who is unable to repay it. We ensure that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose.

- **Debt collection companies**

Avarda may need to share your information when we sell or outsource collection of unpaid overdue debts through a third party, such as a debt collection company.

Purpose and legal basis: This data is shared to collect your overdue debts. Debt collection companies process personal data in accordance with their own privacy notices, or only on behalf of Avarda in their capacity as Avarda's processors. This data is shared based on our legitimate interest in collecting and selling debt. When balancing interests, Avarda has determined that we have a legitimate interest in collecting and selling debts. Avarda ensures that the processing this entails is necessary to pursue that interest, and that our interest outweighs your right not to have your information processed for this purpose.

- **Financial institutions**

Avarda shares your information with financial institutions (such as other banks) when you make transactions or payments to other accounts.

Purpose and legal basis: If you have made payments to a Avarda account or other banks, Avarda will process the information we receive from the bank you used for the transaction, such as contact and identification data and payment information. Sharing is performed to fulfil the agreement with you .

- **Advertising services**

Avarda uses different advertising services provided by e.g., Google Analytics, Google Ads and Facebook Ads.

Purpose and legal basis: Avarda will share your personal data with third party advertising services in order to show you more relevant advertising. Avarda will also share this data to assess the relevancy of certain third party advertising services. Some third party advertising services will use your data for their own purposes and in accordance with their own privacy policies. This processing is based on your consent. You can revoke your consent at any time.

## **7. Third-country transfer**

In principle, your personal data will not be transmitted to a third country or international organization. Avarda will only carry out such transfers where we are confident that the level of protection that applies to personal information will be similar as if it had remained withing the EEA. Countries located outside the EEA may not have data protection laws and regulations comparable to the ones applicable

in the EU. To the extent that no statutory level of security comparable to the EU data protection laws or adequacy decision exists in such countries, Avarda will adopt appropriate measures to ensure that your personal data will be adequately protected in these countries. In particular, Avarda may apply the standard contractual clauses published by the European Commission.

## 8. The Data Subject's rights

- **Right to information**

You have the right to information on how Avarda is processing your personal data, and you can contact Avarda if you wish to have detailed information about the processing of your personal data. Avarda may request that you are specific in that regard.

- **Right to withdraw your consent**

You have the right to withdraw your consent to process personal data for marketing purposes, including both direct marketing and the use of tracking services, such as cookies.

- **Right of access**

You have the right to request access to your personal data processed by Avarda, unless Avarda has a right or a legal obligation not to share personal data or unless the data can be disclosed in a secure manner.

- **Right to data portability**

You have the right to request a copy of the personal data relating to you that Avarda holds for the performance of a contract with you, or based on your consent, in a machine readable format. This will allow you to use this data somewhere else, for example to transfer your personal data to another controller/recipient.

- **Right to rectification and erasure**

You have the right to rectification or erasure of your personal data if certain requirements are met, and if Avarda no longer can prove legal basis for the processing by taking into account the provisions of Section 4 of this Privacy Statement.

- **Right to restrict processing**

Subject to the statutory requirements, the fulfilment of which must be assessed on a case-by-case basis, the right to restrict processing includes your right to request limitation of data processing.

- **Right to lodge a complaint**

You have a right to lodge a complaint connected to data processing directly to Avarda, see contact details under section 2. If you are unsatisfied with the reply received from Avarda, you have the right to lodge a complaint with the relevant regulator, see contact details under section 10.

- **Right to object**

You have the right to object to the processing of your personal data that takes place on the basis of legitimate interests, unless the legitimate interest overrides your fundamental rights and freedoms, You also have the right to object processing which concerns marketing or profiling,

## 9. Automated decision-making and profiling

Avarda sometimes uses profiling and automated decision-making when providing our services to you as a Customer. For instance, we use automated decision-making for the purpose of risk management, to verify your identity, assess your financial information and to ensure that you reside in a country



where we offer our service. This is done for the fulfilment of our legal obligations to conduct know your customer checks in relation to our anti-money laundering obligations.

## 10. Your right to complain

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact us at [dpo@avarda.se](mailto:dpo@avarda.se) and we will respond.

If you remain dissatisfied, you can make a complaint about the way we process your personal information to the following authorities:

Country	Contact details
Sweden	<p>Integritetsskyddsmyndigheten Drottninggatan 29 5th Floor Box 8114, 104 20 Stockholm, Sweden Tel: +46 8 657 6100 Fax: +46 8 652 8652 Email: <a href="mailto:imy@imy.se">imy@imy.se</a></p> <p>The supervisory authority of the main establishment of Avarda is competent to act as lead supervisory authority for cross-border processing carried out by Avarda. The lead supervisory authority for Avarda is the Swedish Data Protection Agency – <i>Datainspektionen</i>.</p>
Finland	<p>Office of the Data Protection Ombudsman P.O. Box 800 FI-00531 Helsinki Tel. +358 10 3666 700 Fax +358 10 3666 735 Email: <a href="mailto:tietosuoja@om.fi">tietosuoja@om.fi</a></p>

## 11. Versions in other languages than English

The original version of this privacy policy is written in Swedish. To the extent that a translated version of this privacy policy conflicts with the Swedish version, the Swedish version shall prevail.

## 12. Changes to this privacy notice

We keep our privacy notice under regular review to make sure it is up to date and accurate. We will inform you of any changes by posting the updated policy on our website.

Date	Changes
July 2024	We have published this privacy notice for the first time.