

# Luminor group privacy policy

Luminor Group (further also “we”, “our” or “us”) is committed to protecting the privacy of all individuals when processing Personal Data. Processing Personal Data by Luminor is subject to the EU General Data Protection Regulation (GDPR) and applicable national laws. This Privacy Policy describes on a general level how we collect, share, and protect Personal Data. Further details on the processing of your Personal Data are described in agreements and other Service-related documents, including our Data Retention Policy.

## Definitions:

<b>Controller</b>	The Controller of your Personal Data is the Luminor Group entity to which you have submitted your Personal Data because of a contractual or pre-contractual relationship or which Services you (or the legal entity or arrangement you are considered to be the ultimate beneficiary owner of) intend to use.
<b>Customer</b>	A natural person who uses, has used or has expressed the intent to use a Service.
<b>GDPR</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
<b>Luminor Group</b>	All Luminor group entities directly or indirectly controlled by holding company Luminor Group AB, registered in the Kingdom of Sweden, org. No 559072-8316, including but not limited to: Luminor Bank AS; Luminor Kindlustusmaakler OÜ; Luminor Liising AS; Luminor Pensions Estonia AS; Luminor bank AB; Luminor büstas UAB; Luminor investicijų valdymas UAB; Luminor Lizingas UAB; Luminor Bank AS (Latvia); Luminor Līzings, SIA; Luminor Līzings Latvija, SIA; Luminor Finance, SIA; Luminor Asset Management, IPAS; Luminor Pensions Latvia, IPAS; Luminor Latvijas atklātais pensiju fonds, AS; the full list of Luminor group entities and their contact details is available at: <a href="https://www.luminor.lt/en/luminor-group-ab-subsiary-companies">https://www.luminor.lt/en/luminor-group-ab-subsiary-companies</a> .
<b>Luminor</b>	Any legal entity or branch belonging to the Luminor Group.
<b>Personal Data</b>	Any information directly or indirectly related to an identified or identifiable Customer or other natural person whose data is processed according to this Privacy Policy and applicable laws (for example, an ultimate beneficiary owner of the customer as a legal entity).
<b>Processing</b>	Any operation carried out with Personal Data (including collection, recording, storing, alteration, grant of access to, making enquiries, transfer, etc.).
<b>Service</b>	Any service offered or provided by Luminor.

# I. General information

## When does this Privacy Policy apply?

This Privacy Policy applies when you use, have used or have expressed an intention or interest to use Luminor's services. It also applies when you are related to any of the Services indirectly (for example, as a collateral provider, insured person in an insurance agreement or a representative of corporate or private customers). It also applies in cases when the relationship has been established before this Privacy Policy has entered into force, and when you have provided and/or Luminor has obtained your Personal Data.

## Which of my Personal Data are processed?

The exact scope of Personal Data being processed depends on the types of Services or relationship with Luminor. Luminor's core activities involve providing financial and insurance products and Services. This includes accounts and payment services, loans, electronic banking services, savings and investment products and services, including pension funds as well as insurance. Luminor also offers selected real estate-related financial services. We process your Personal Data to provide and improve these Services. Additionally, Luminor processes the Personal Data of its corporate, private customers' and vendors' representatives. Personal Data we collect and process includes:

- identification data such as name, surname, middle name, personal identification number (national ID number, customer ID, employee code, internet bank ID), date of birth, tax identification number, country of birth, gender, citizenship, passport data, photograph;

- contact data such as residence address or address for communication purposes, postal address, telephone number (for example, landline and mobile number), email address, language of communication;

- digital identification data such as Internet bank ID, mobile bank ID, social media or Skype personal ID;

- financial data such as monthly salary and other regular or irregular income, financial liabilities, source of income (funds), data about transactions, property, debts, bank account, card information, credit history data;

- occupation (employment) data such as data about employer / previous employer, occupation, working experience, education, professional certificates;

family data such as marital status, dependants and / or family members;

- location data (transaction place, IP address, login place), login of internet usage;

- special category data such as data about criminal convictions, legal capacity (in special cases);



## Which of my Personal Data are processed?

- other data:

- data about the participation in companies and other types of legal entities, data about managers and other persons having decisive votes or representatives of the companies using or intending to use Services, as well as their ultimate beneficiary owners' information and contact details of the representatives of the companies using or intending to use Services;
- information on social security contributions and insurance, information on payable pension/ allowance/ indemnification;
- legal proceedings (type);
- correspondence records (type, date, tracking ID);
- risk profiling and classification (risk type, risk class);
- video surveillance data such as video records captured at ATMs and Customer service units;
- voice records data such as voice records of phone or Skype or other Internet based calls;

We do not process sensitive data related to your health, ethnicity, or religious or political beliefs unless required by law or in specific circumstances where, for example, you reveal such data while using Services (e.g. in payments details).

We only collect data about children if they use a Luminor Service or if you provide us with information about your own children in relation to a Service you use.



## How does Luminor collect my Personal Data?

Generally, Luminor receives Personal Data directly from the person to whom the data relates to. For example, when you:

- apply for Services (for example, open an account or apply for a loan or leasing);
- use Services (for example, use your credit or debit card or deposit money);
- make contributions to Luminor pension funds;
- contact Luminor (for example, visit our website or internet bank), fill in a form on our websites or leave your contact information with Luminor for whatever reason;
- visit our websites, use our internet bank or phone app.

In some instances, Luminor obtains Personal Data from persons other than the data subject (e.g. you). This is the case, for instance, when a parent applies for a service that involves a child, or when legal entities apply for services that involve their employees. In such instances, we require that such data subjects are informed about the disclosure of their Personal Data to Luminor and the purpose of such Personal Data Processing. Furthermore, in such instances we require that when you are providing Personal Data about a data subject other than yourself you introduce such data subjects to our Privacy Policy.

Personal Data can also be provided to Luminor by third parties on the request of a potential customer. For example, real estate brokers or car dealers may send your Personal Data to Luminor if so requested by you.

Personal data can also be received by Luminor when we are signing various agreements where a counterparty or a representative of a counterparty is not necessarily a Customer (e.g. mortgage agreement, warranty agreement, agreement concluded with a legal entity, where contact persons or representatives' data are indicated).

Within the Luminor Group, all Luminor entities have access to Personal Data disclosed to Luminor insofar as such access is necessary for administrative purposes or covered by Luminor's legitimate interests.

When we have a legitimate interest or when it is required by applicable laws (e.g. to ensure responsible lending, to investigate suspicious transactions) we also collect your Personal Data from other external sources, such as credit bureaus, public and private registers or other companies or state institutions.

## Does Luminor use cookies?

Yes, Luminor uses cookies, which are small text files placed on your computer, smartphone or other device in order to improve the website functionality and facilitate better user experience. Luminor's Cookie Policy is available at:  
<https://www.luminor.lt/en/cookies>.

## II. Why does Luminor collect and process my Personal Data?

### Providing Services

The first and foremost reason why we need your Personal Data is for providing our Services.

There will be Personal Data which we will always need without regard to what Service you choose, such as your identification information or contact information, preferences of communication language, etc. But some Services, because of their nature, will require more information. For example, in the case of any type of loan or leasing, we will need information about your income and household as well as information about other liabilities. If you are applying for or have a mortgage loan, we also will need information about property, including information about its insurance. We also need specific data if you would like to apply for or are using investment products. In such cases, for example, we need to know and evaluate your overall investment experience and knowledge about these products and services to offer you suitable products and services or advise you to reconsider, when we think your choice might be too risky taking into account your personal circumstances.

Most of the data we will ask for and receive from you. However, some we receive from other sources. Information about your liabilities we will obtain from credit registers or other similar public sources <https://www.luminor.it/en/terms-conditions>.

### Protecting the interests of depositors

Financial services are related to various risks, and we are obliged to manage those risks to ensure the sustainability of our business model and protect the interest of depositors and society in general.

This means we monitor issued loans and the performance of those loans, and learn from our history (previously issued loan history) in order to improve the new credit assessment process. We analyse data we already have. In addition, we can also obtain updated information from credit registers and similar public external sources <https://www.luminor.it/en/terms-conditions>.



### **Fulfilling requirements set in laws and regulations**

Banking is a highly regulated industry, which means that in order to provide you Services, we need to comply with many regulations. Therefore, we need to collect explicit identification information, but in certain cases, we need to collect additional personal information. For example, to follow all anti-money-laundering requirements, we need to know information about your source(s) of income, whether you are a politically exposed person or related to one and your tax residency country. Most of that information we collect from you in the so-called Know Your Customer questionnaires. We are obliged to obtain Personal Data about you even if you are not directly our customer but the ultimate beneficiary or the owner of the corporate entity (e.g. company) which is our customer. Moreover, we are required to monitor your transactions and investigate if their pattern deviates from information provided by you earlier and, if needed, ask for additional information (e.g. agreement or other document proving source of unexpected income).

We also must report to public authorities, like the state revenue service, social security institutions, central banks or other financial sector supervisory authorities. What data we report will depend on which law(s) or regulatory requirements we are fulfilling. If you have deposits (including funds in current account(s)) or investment products, we could be obliged to report to the tax authorities about account balance(s) and interests paid; in the case of a loan, we will be obliged to report data about your loan (e.g. financial obligation(s)).

Most of the data we will receive from you, but we will also use third party registers or other sources

<https://www.luminor.it/en/terms-conditions>.

### **Improving services and being relevant to you**

We want to offer Services and provide information which are relevant to you. We improve our Services constantly, and thus customer data and input is very important. We also want you to know about our new or improved Services. We analyse our Customers' data to develop and offer additional Services, perform Customer surveys, conduct market analysis and compile statistics, and organize games or campaigns to improve your experience while using our Services.

### **Ensuring security**

Financial services are also exposed to criminal activities. To mitigate those risks we perform data processing – video recordings, transaction monitoring, ensuring our IT system security.



### III. Advertising and direct marketing

**Who receives Luminor's advertising and direct marketing communications?**

Our advertising and direct marketing communications (e.g. about our Services and related campaigns) are sent to Customers who have consented to receiving direct marketing and advertising offers from Luminor. Such Customers receive Luminor newsletters and direct marketing communications via their preferred means of communication. Luminor may market its Services to the existing Customers on the ground of legitimate interest.

**How do I give a consent to receive advertising and direct marketing?**

Customers can give consent to receive advertising and direct marketing communications by signing a direct marketing consent form or by requesting direct marketing communications under the agreements they conclude with us. Customers who have already been receiving our direct marketing messages will continue to receive such communications after the GDPR's entry into force.

**What kind of advertising and direct marketing activities does Luminor perform?**

Luminor sends newsletters and direct marketing communications. Services and products may be also promoted during various customer events organised by Luminor.

**Can I object to the use of my Personal Data for direct marketing purposes?**

Customers have the right to object to the processing of their Personal Data for direct marketing purposes at any time and free of charge. To exercise this right, please contact the Luminor entity whose marketing material you no longer wish to receive. Customers can also opt out of receiving the newsletter or any other advertising and marketing communications using the link provided in the e-mail message or following other instructions as provided in such direct marketing communication.

### IV. Sharing and protection of my Personal Data

**Who can access my Personal Data?**

Only persons entitled to do so within Luminor or third parties engaged by Luminor or other parties as requested or permitted by law can access your Personal Data. In cases where Personal Data Processing is carried out on behalf of Luminor by a third party, Luminor engages only third parties providing sufficient guarantees to implement appropriate technical and organisational measures in such manner that Processing will meet the requirements of the GDPR and applicable laws and ensure the protection of your rights. Processing activities by third-party processors shall always be governed by a Privacy & Data Processing Agreement or other specific terms agreed upon by Luminor and such third party processor.



### With whom may my Personal Data be shared?

The nature of Services provided requires us to share Customers' Personal Data to run our everyday business – to process transactions, maintain customer accounts, and report to public institutions.

We may disclose your Personal Data to:

- Luminor group entities (for administrative and marketing purposes);
- Luminor cooperation partners, with whom Luminor offers co-branded products and Services (for providing such Services and products as well as for marketing and advertising such products);
- state institutions and other entities performing functions delegated to them by law;
- authorized auditors, legal and financial advisers;
- Personal Data processors engaged by Luminor which assist Luminor in providing Services;
- credit and financial institutions, credit bureaus, financial services brokers and insurance service providers;
- managers of public registers;
- debt collection companies, credit bureaus and other third parties to which Luminor may assign its rights and obligations.

Data may also be transferred outside the European Union and European Economic Area (EU/EEA) in some cases, for example, when the Personal Data processor engaged by Luminor is located outside the EU/EEA and such data transfer is necessary to provide Service or when requested by a Customer. Data may be transferred outside the EU/EEA only when Luminor ensures appropriate safeguard measures as required by the GDPR and there is a legal ground for such transfer.

The list of our Personal Data processors is available at:

<https://www.luminor.it/en/terms-conditions>.

This list can be changed without separate notice.

### How does Luminor protect my Personal Data?

To protect your Personal Data from unauthorized access, unlawful Processing or disclosure, accidental loss, modification or destruction, we use appropriate measures that comply with applicable laws. These measures include technical measures, such as the selection and configuration of appropriate computer systems, securing relevant connections, and protection of data and files, as well as organizational measures, such as limiting access to these systems, files and facilities.



## Your rights in relation to Personal Data processing

### What are my rights?

Luminor is dedicated to ensuring that Personal Data Processing is fair and transparent and all persons' rights arising under applicable laws are always ensured. In particular, you have:

- the right to access the Personal Data Luminor processes about you. Upon your request, Luminor shall:
  - confirm as to whether or not Personal Data relating to you are being processed and provide information as to the purposes of the Processing, the categories of Personal Data concerned, and the recipients or categories of recipients to whom the Personal Data are disclosed;
  - communicate to you about the Personal Data undergoing Processing and about any available information as to their source;
  - provide to you knowledge of the logic involved in any automated processing of Personal Data concerning you in the case of automated decisions.
- the right to request us to rectify any inaccurate Personal Data;
- when Processing of Personal Data is based on consent, you have the right to withdraw consent at any time, without affecting the lawfulness of Processing based on consent before its withdrawal;
- the right to receive the Personal Data Processed in a structured, commonly used and machine-readable format and the right to transmit the Personal Data to another controller under certain conditions;
- under certain circumstances, you shall have the right to request erasure or restriction of Processing of the Personal Data;
- the right to object to the Processing of the Personal Data for specific purposes and under certain conditions;
- you also have a right to lodge a complaint with a supervisory authority – in Estonia to the Data Protection Inspectorate; in Lithuania to the State Data Protection Inspectorate; in Latvia to the Data State Inspectorate.

## How long Luminor retains Personal Data

### How long is my Personal Data retained by Luminor?

Personal data is retained in accordance with the applicable laws and no longer than is necessary. Personal data retention periods are determined by Luminor and depend on the specific contract and basis of Personal Data Processing. For more detailed information on some retention periods and the principles for how we determine specific retention periods for your Personal Data processed by us, please follow this link:

<https://www.luminor.lt/en/data-retention-policy>.

## V. Profiling and automated decision making

### **What is profiling?**

Profiling is Customer segmentation by evaluating the personal aspects relating to a natural person in order to apply a relevant service model or tailored marketing offers or perform risk assessment for anti-money laundering purposes.

### **What does Luminor use profiling for?**

Luminor uses profiling to prepare analyses for Customer advice, for direct marketing purposes, for automated decision-making such as credit assessments, for risk management and for transaction monitoring to counter fraud. Luminor uses profiling based on the following legal grounds:

- compliance with a legal obligation. Luminor may process Personal Data and evaluate personal aspects if Luminor must perform risk assessment for anti-money laundering purposes;
- consent from the Customer or in some limited cases also on the ground of legitimate interest. Luminor may use profiling to evaluate the Customer's need, develop its Services, and provide more relevant and just-in-time Service offers.

### **Do I have a right to choose if I want to be subject to a decision based on automated processing, including profiling?**

Luminor may make a decision with respect to the Customer, including but not limited to making an assessment about the creditworthiness of the Customer based solely on automated processing of the Personal Data.

In such a case, the Customer has a right not to be subject to a decision based solely on automated processing, including profiling. Such right may be executed by the Customer if, based on the automated decision, Luminor has refused to enter into the contract or provide Services. Upon your request the automated decision will be revised by Luminor employees.

More detailed descriptions of processes which include automated decision making can be found here <https://www.luminor.lt/en/terms-conditions>.



## VI. Final provisions

**Legal statement and validity** This Privacy Policy is not designed to form a legally binding contract between Luminor and the Customer – instead, it is a guide on our Personal Data protection standards. As we are constantly working on improving and developing our Services and websites we may change this Privacy Policy from time to time. We will not reduce your rights as a result of such changes. In the case of material changes and where we think it is relevant, we shall notify you via Luminor’s website, by post, via e-mail or internet bank messages or in another manner as chosen by us, not later than 1 (one) month prior to such amendments entering into force. The Privacy Policy shall also be available on request at customer service units.

**Any questions?** If you have any questions or concerns regarding how Luminor processes Personal Data about you, or if you wish to exercise any of your rights, Luminor encourages you to contact us via telephone or e-mail or in writing <https://www.luminor.lt/en/contacts>.

Contact details for any privacy related questions are following:

Data protection officer in Lithuania  
[dataprotectionLT@luminorgroup.com](mailto:dataprotectionLT@luminorgroup.com)

Data protection officer in Latvia  
[dataprotectionLV@luminorgroup.com](mailto:dataprotectionLV@luminorgroup.com)

Data protection officer in Estonia  
[dataprotectionEE@luminorgroup.com](mailto:dataprotectionEE@luminorgroup.com)



