

## Privacy notice

Nordania Finans A/S (Danske Leasing A/S), which is part of Danske Bank Group, and Nordania Leasing, division af Danske Bank A/S (in the following collectively referred to as “Nordania”) are financial institutions that offer financial advice and leasing and loan services to their customers.

In the course of our business, we register and use information about you (personal data). We do so to offer you the best advice and solutions, fulfil agreements with you and comply with legal requirements.

We protect your data and privacy by taking all relevant measures in accordance with applicable legislation.

This privacy notice sets out the basis for how legal entities and branches within Danske Bank Group look after your personal data and the privacy rights you are granted by law.

## Why do we register and use your personal data?

We register and use data about you to offer you the best advice and solutions, keep your finances safe from fraud, fulfil agreements with you, and comply with the legal requirements that apply to us as a financial institution.

This means that we register and use personal data when

- you have made or you are considering making an agreement with us for a service or product, cf. the General Data Protection Regulation (GDPR) art. 6.1(b)
- you have granted us consent to use your personal data for a specific purpose, cf. GDPR art. 6.1(a)
- it is our legal duty, for example, in accordance with
  - The Danish Anti-Money Laundering Act (*Hvidvaskloven*)
  - The Danish Tax Control Act (*Skattekontrolløven*)
  - The Danish Bookkeeping Act (*Bogføringsloven*)
  - The Danish Credit Agreements Act (*Kreditaftaleloven*)
  - The Danish Financial Business Act (*Lov om finansiel virksomhed*)
  - The Danish Payments Act (*Betalingsloven*)
  - The Danish Data Protection Act (*Databeskyttelsesloven*)
  - The Danish Act on Registration of Vehicles (*Lov om registrering af køretøjer*)
- it is necessary to pursue a legitimate interest of Nordania, cf. GDPR art. 6.1(f). For example, this may be to prevent abuse and loss, to strengthen IT and payment security or/and for direct marketing purposes. We will only do so if our interest clearly outweighs your interest in not having your personal data processed by us.

## What personal data do we register and use?

Depending on the services or products you have ordered or are interested in, we register and use different kinds of personal data, including

- basic personal data, e.g. your name, contact information and national ID
- financial information, e.g. income, collateral, debt or credit assessment
- information about your education, profession or work
- information about your family and household
- ID documentation, e.g. photocopies of your passport, driver's license or health insurance card
- details about the services and products we provide to you, how you use them and your preferences in that respect

#### *Sensitive data*

We register sensitive data only when we need them to advise you on or offer you a product or service. We will seek your explicit consent to register sensitive personal data, cf. GDPR art. 9.2(a), unless we are permitted to register sensitive data without your consent by law, cf. GDPR art. 9.2(f), for example in connection with legal claims. Sensitive personal data we may register include

- trade union membership information
- information about your health and your genetic background, e.g. hereditary health issues, and biometric data, e.g. facial image

We may also register other personal data if needed to provide you with specific products or services or if we are required by law to do so.

Our ability to offer you the best advice and solutions very much depends on how well we know you. Consequently, it is important that the information you provide is correct and accurate and that you keep us updated on any changes.

## **Why and how do we register and use your personal data?**

We register and use personal data for the provision of financial services and products, including

- leasing
- loans and credits, including purchase contract financing
- payment services
- accounts
- digital solutions
- advice
- insurance services

We also register and use data for other activities related to the provision of certain services and products, including

- customer care, advice and administration
- credit assessment
- developing and managing our products, services and business
- marketing of our services and products
- setting fees and prices for our services and products
- customer identification and verification
- risk management

- recovering outstanding debt
- protecting you and Danske Bank Group against fraud
- complying with legal requirements

We collect the information directly from you or by observing your actions, for example when

- you fill out applications and other forms for ordering services and products
- you submit specific documents to us
- you call us by phone. We will inform you if we record our telephone conversation
- you use our website, mobile applications, products and services
- you participate in our customer surveys or promotions organised by us
- you participate in customer events (e.g. car days)

## How long do we store your personal data?

We keep your data for as long as they are needed for the purpose for which your data were registered and used. Therefore, we keep your information as long as we are providing a financial service or product to you. When your business relations with us have terminated, we normally keep your data for a further 7 years. This is primarily due to our obligations under the Danish Bookkeeping Act (*bogføringsloven*), the Danish Anti-Money Laundering Act (*hvidvaskloven*) and requirements from the Danish Financial Supervisory Authority (*Finanstilsynet*). In certain circumstances, we keep your information for a longer period of time. This is the case for example:

- if your personal data form part of our calculation of our capital adequacy requirements, in which case we may keep your data for up to 20 years,
- if the statute of limitation is 10 years, in which case we may keep your data for up to 10 years.

## Third parties and your personal data

### Personal data from third parties

We register and use data from third parties, for instance

- The Danish Central Office of Civil Registration (CPR) and other publicly accessible sources and registers. We register and use the data, for example to check data accuracy.
- Entities of Danske Bank Group (if we have your consent), credit rating agencies and warning registers. We register and use the data to perform credit assessments. We update the data regularly.
- Entities of Danske Bank Group. We register and use data from their notifications to the State Prosecutor for Serious Economic and International Crime (SØIK) in accordance with anti-money laundering legislation.
- Entities of Danske Bank Group and business partners (including correspondent banks and other banks) if we have your consent or statutory provisions allow it.
- The Danish Customs and Tax Administration (Skattemyndighederne), for example when we register you as a user with the Danish Register of Motor Vehicles.

- Insurance companies, for example in connection with your motor insurance.
- The Danish Land Registration Court in connection with registration of retention of title/charges.
- The car dealer in relation to the contractual relationship, for example when you request information from the relevant dealer about the residual debt under your purchase contract.
- Businesses and public authorities in connection with the issuance of parking fees or parking fines (if the parking fine or fee is sent to us).
- Foreign authorities concerning collection of road tolls relating to use of the vehicle abroad.

### Third parties that we share your personal data with

In some instances, we may share personal data with third parties inside or outside Danske Bank Group:

- If you have asked us to transfer an amount to others, we disclose data about you that are necessary to identify you and fulfil the agreement.
- We disclose data about you to public authorities as required by law, including to the State Prosecutor for Serious Economic and International Crime (SØIK) in accordance with the Danish Anti-Money Laundering Act, to Skattemyndighederne in accordance with the Danish Tax Control Act (*skattekontrolloven*) and to the Danish central bank (*Danmarks Nationalbank*) for statistical and other purposes.
- We disclose data with your consent or if permitted under existing legislation internally within the group and to external business partners (including correspondent banks and other banks).
- We share your personal data with credit rating agencies. If you default on your obligations to Nordania, we may report you to credit rating agencies and/or warning registers in accordance with applicable regulation.
- In connection with IT development, hosting and support, we transfer personal data to data processors, including data processors in third countries outside the EU and the EEA, such as Danske Bank India. We ensure that your rights are safeguarded and that the level of protection is maintained in connection with such data transfers by using, for example, standard contracts approved by the European Commission or the Danish Data Protection Agency (*Datatilsynet*). You can get a copy of the standard contract by contacting us.
- We can transfer your personal data to third parties within and outside the Danske Bank-Group as part of the electronic case handling of your consideration (application) and entering of agreements with us. Such third parties can in certain cases share your personal data with each other.
- The Danish Customs and Tax Administration (Skattemyndighederne), for example when we register you as a user with the Danish Register of Motor Vehicles.
- Insurance companies, for example in connection with your motor insurance.
- The Danish Land Registration Court in connection with registration of retention of title/charges.
- The car dealer in relation to the contractual relationship, for example when you request information from the relevant dealer about the residual debt under your purchase contract.
- When your car leasing agreement expires we will make a following sale of the car. This entails that the original registration papers on the car are enclosed. On these registration papers your name and address appear and this information is thereby transferred to the purchaser of the

car. The purchaser will always be a professional car dealer who will use the registration papers to reregister the car.

- In case you have entered into a contract (leasing agreement, loan agreement or hire purchase agreement) concerning a car of the following brands: Volkswagen, Audi, Seat, Skoda or Porsche and there in connection to such agreement has been made an agreement on maintenance and service, we exchange personal data, including name, address and serial number of the car with Skandinavisk Motor Co. A/S and the maintenance workshop, in order for us to administer the invoicing of the agreement on maintenance and service.
- In case you have entered into a leasing agreement on a car of the following brands: Volkswagen, Audi, Seat or Skoda an OBD-box is installed in your car. For us to be able to administer correct invoicing hereof we exchange the car's serial number and information of the leasing agreement with Skandinavisk Motor Co. A/S.

## **Profiling and automated decisions**

### **Profiling**

Profiling is a form of automated processing of your personal data. We use profiling and data modelling e.g. to be able to offer you specific services and products that meet your preferences, prevent anti-money laundering, determine prices of certain services and products, detect fraud and fraud risk, evaluate the likelihood of default risk, value assets and for marketing purposes.

### **Automated decision-making**

With automated decision making, we use our systems to make decisions based on the data we have about you. We use automated decisions for example to approve loans or leasing and to prevent fraud. Automated decision making helps us make sure that our decisions are quick, fair, efficient and correct, based on what we know.

## **Your rights**

### **Access to your personal data**

You can obtain insight into the personal data we have registered and use, where they come from and what we use them for. You can obtain information about for how long we store your data and about who receives data about you, to the extent that we disclose personal data in Denmark and abroad. Your right of access may, however, be restricted by legislation, for the purpose of protection of other persons' privacy and consideration for our business and practices. Our know-how, business secrets as well as internal assessments and material may also be exempt from the right of access.

### **Manual processing**

You can obtain insight into how an automated decision was made and the effects of the decision, and you are entitled to manual processing of any automated assessment.

### **Right to object**

In certain circumstances, you have a right to object to our processing of your personal information. This is the case for example when the processing is based on our legitimate interest.

### **Objection to direct marketing**

You have the right to object to our use of your personal information for direct marketing purposes, including profiling that is related to such purpose.

### **Correction or erasure of Nordania's data**

If the data are incorrect, incomplete or irrelevant, you are entitled to have the data corrected or erased with the restrictions that follow from existing legislation and rights to process data. These rights are known as the "right to rectification", "right to erasure" or "right to be forgotten".

### **Restriction of use**

If you believe that the data we have registered about you are incorrect, or if you have objected to the use of the data, you may demand that we restrict the use of these data to storage. Use will only be restricted to storage until the correctness of the data can be established or it can be checked whether our legitimate interests outweigh your interests.

If you are entitled to have the data we have registered about you erased, you may instead request us to restrict the use of these data to storage. If we need to use the data we have registered about you solely to assess a legal claim, you may also demand that other use of these data be restricted to storage. We may, however, be entitled to other use of the data, including to assess a legal claim or if you have granted your consent to this.

### **Withdrawal of consent**

You can withdraw your consent at any given time. Please note that if you withdraw your consent, we may not be able to offer you specific services or products. Note also that we will continue to use your personal data, for example, to fulfil an agreement we have made with you or if we are required to do so by law.

### **Data portability**

If we use data based on your consent or an agreement, and the data processing is automated, you have a right to receive a copy of the data you have provided in an electronic machine-readable format.

## Contact details and how you can complain

You are always welcome to contact us if you have questions about your privacy rights and how we register and use personal data. You can contact our data protection officer function via email [dpofunction@danskebank.com](mailto:dpofunction@danskebank.com)

If you are dissatisfied with how we register and use your personal data, and your dialogue with the data protection officer function has not led to a satisfactory outcome, you can contact our complaints handling unit: Danske Bank, Legal Department, Holmens Kanal 2-12, DK-1092 København K, e-mail: [klageservice@danskebank.dk](mailto:klageservice@danskebank.dk). You can also lodge a complaint with the Danish Data Protection Agency: Datatilsynet, Borgergade 28, 5., DK-1300 København K, e-mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk).