

# **FOREX PRIVACY POLICY**

#### INFORMATION ABOUT PERSONAL DATA PROCESSING

FOREX AB is a payment institution and is supervised by the Swedish Financial Supervisory Authority. FOREX AB has branches in Norway, Finland and Denmark and a subsidiary in Denmark ("FOREX"). FOREX provides payment services and travel currency, and together with its partners, also offers among other things travel insurance, credit cards and other travel-related products and services.

FOREX protects your personal privacy and processes all personal data in accordance with Regulation (EU) 2016/679 ("GDPR"), the Act (2017:630) on measures against money laundering and the financing of terrorism (" Money Laundering Act") and other supplementary legislation such as the Act (2018:218) with supplementary provisions to the EU General Data Protection Regulation (" Data Protection Act").

FOREX is the data controller for the processing of personal data that takes place within the framework of FOREX's operations.

FOREX AB (company no. 516406-0104)

Visitors' address: Stora Nygatan 27, 111 27 Stockholm, Sweden

Telephone numbers: + 46 (0)10-211 10 00 (switchboard) and +46 (0)771-22 22 21

(customer service)

Website: <u>www.forex.se/en/</u> Email address: info@forex.se

This Privacy Policy explains how FOREX processes your personal data when you use FOREX's services or when you contact us, what rights you have and how to proceed if you wish to exercise your rights under the GDPR. To avoid any uncertainty, this Privacy Policy also applies to the processing of personal data of third parties, i.e. natural persons who have not been, are or intend to become customers of us. This may, for example, be payers, delegates, administrators, proxy holders, representatives, contact persons and real principals.

If you have any questions about our processing of personal data, you are welcome to contact us at dataskyddsombud@forex.se.

### 1. PERSONAL DATA WE PROCESS AND WHY

Personal data refers to any information relating to an identified or identifiable natural person, such as name, contact details, personal identity number, account number or other information that can be directly or indirectly linked to you as an individual. Processing of personal data refers to an action or combination of actions relating to personal data, such as collection, storage or transfer.

FOREX processes personal data for the following main purposes:



- To provide our services and products and enter into, fulfil, and administer contracts with you regarding our services and products
- Manage the customer relationship and provide customer service
- Communication and targeted offers
- Business development and market and customer analysis
- Investigation and security purposes
- Fulfilment of obligations set out by law, other statutes or official decisions
- Establishment, assertion and exercise of legal claims

### We process the following personal data:

- Identity data: Such as name, date of birth, personal identity number, IP number, customer number, insurance number and citizenship.
- Profile data: e.g. nationality, country/place of birth, demographics, marital status and profession.
- Your details: Such as e-mail address, telephone number, address.
- Financial information: Such as ownership details, transactions, credits, completed transactions, income, liabilities and the type of agreement you have with us.
- Data on credibility: Such as payment behaviour, data that enables FOREX to conduct investigations regarding money laundering and the prevention of the financing of terrorism and to ensure compliance with international sanctions and whether the customer is a politically exposed person.
- Customer interactions and engagement: Such as communication between you and FOREX, call recordings, notes about you as a customer and information about the products and services you have.
- Digital information related to your use of our website, other platforms and digital applications including traffic data, location data, behavioural data and other communication information.

### 2. COLLECTION OF PERSONAL DATA

FOREX collects personal data that you provide directly to FOREX. In order to be able to offer you FOREX products and services and to meet regulatory requirements, FOREX also processes personal data provided by third-party operators and from public registers. Examples of third-party actors are the state's personal address register SPAR, sanctions lists (for example, lists from international organisations such as the EU and the UN, as well as the US Office of Foreign Assets Control (OFAC)), commercial address providers and other financial institutions. Should you receive direct marketing and it is sent with the support of address data from a commercial address provider, it is clear that it concerns purchased address information and the name of the third-party source.

If you call FOREX, your call may be recorded, which involves personal data processing. In this case, you will be informed of this and the purpose for doing so before recording begins.

FOREX also collects personal data through camera surveillance in our stores. This is because your safety and that of your staff is important to us. The recorded material is only used to prevent,



impede and investigate crimes and suspected crimes. The material may be submitted to the police and prosecutor's office.

### 3. IF YOU DO NOT WANT TO DISCLOSE YOUR PERSONAL DATA

You are not obliged to provide personal data other than to fulfil any obligation under a contract you have entered into with us. However, if you do not wish to provide your personal data, this may mean that FOREX is unable to provide services or information to you as a customer or otherwise in contact with FOREX.

#### 4. OUR PROCESSING

#### 4.1 General

In the following section, you will find more information about our personal data processing, including the specific purposes for which your personal data is processed, which categories of personal data FOREX processes and the legal basis that supports the processing.

4.2 Provision of products and services and entering into, fulfilling and administering contracts

We process your personal data to enable us to provide the services you request and to otherwise be able to conduct payment service activities and related functions. "Services" refers, for example, to currency, net currency and foreign exchange services. In order to provide these services, we collect and process the personal data that you provide when contacting us via the FOREX website, email, telephone and visits to our stores.

When using our insurance services, it is also possible for you to take out insurance for travelling companions, which means that in addition to your personal data, we must also process personal data attributable to the relevant travelling companion(s). When you provide information about other people, you must ensure that these people are informed and that you have permission to provide the information. You should also ensure that these travelling companions have read the privacy information and understand how their personal data may be used by us.

The main purpose of FOREX's processing of your personal data is to collect, check and register the data required to enter into agreements with you and for the purpose of documenting, administering and fulfilling such agreements.

The legal basis for the processing of your personal data is that this is necessary to *fulfil our* agreement with you as a customer.

The following personal data is processed for this purpose:

- Identity data, such as name, personal identity number and customer number.
- Contact information, such as email address, telephone number and address.
- Financial information, such as income and liabilities.
- Customer interactions, such as communication between you and FOREX.
- 4.3 Management of the customer relationship and conduct customer service



We process personal data in ongoing contact with you as a customer, prospective customer or former customer in order to manage customer relationships, answer questions about our products and services, send you information about changes in our products and services or answer general enquiries about our product and service range via e.g. email, phone, chat or our social channels.

The *main purpose* of FOREX's processing of your personal data is to manage past, ongoing and potential customer relationships and to conduct customer service.

The legal basis for our processing of your personal data is that this is necessary for the *fulfilment* of our contract with you as a customer or to take steps at your request before entering into such a contract. Some processing may also take place on the basis of our *legitimate interest*, consisting of handling requests for you and providing you with our products and services. In cases where we, base our processing on a balance of interests, assess that our legitimate interest outweighs the rights and freedoms of data subjects.

The following personal data is processed for this purpose:

- Identity data, such as name, personal identity number and customer number.
- Contact information, such as email address, telephone number and address.
- Financial information, such as information on income and liabilities and information on completed transactions.
- Customer interactions, such as communication between you and FOREX.

### 4.4 When you integrate with our website and mobile application

In connection with your visit to our website and/or our mobile application, we may process your personal data in the form of, for example, identity data for the purpose of providing you with access, improving and simplifying the experience, adapting our digital services based on your personal choices and analysing your use of and how you integrate our website/mobile application for our own business development, as well as improving and streamlining our marketing.

The processing takes place using cookies and similar tracking technologies to which you consent and can manage the settings in our interfaces.

The processing that is necessary to provide you access to and ensure the functionality of our website and mobile application, improve and simplify the experience, adapt our digital services based on your personal choices and analyse your use of our digital services, and is supported on the legal basis of legitimate interest. In this case, we have assessed that our interest in being able to provide error-free, simple and user-friendly digital services outweighs your interest in not having your personal data processed.

Processing that is made possible by the placement of cookies and other tracking technologies and that takes place for analysis and marketing purposes is supported by the legal basis of legitimate interest, where we have made the assessment that our interest in targeting relevant



offers to you and adapting our digital services based on your personal preferences outweighs your interest in not having your personal data processed.

As a general rule, FOREX does not track individuals and their behaviour on several different websites for the purpose of using this data for targeted advertising or direct marketing. In the event that such processing is relevant, FOREX always ensures that you have given your consent to such processing, which consequently is also the legal basis.

You can limit our ability to collect certain device and usage data at any time through cookies in our interface. For more information on how we use cookies and other tracking technologies, please see our cookie policy available <a href="https://www.forex.se/en/customer-service/Terms-and-policies/">www.forex.se/en/customer-service/Terms-and-policies/</a>.

The following personal data is processed for the above purposes:

- Identity data, such as IP address.
- Digital information related to your use of our website, other platforms and digital applications including traffic data, location data, behavioural data and other communication information.

### 4.5 Communication and targeted offers.

We want to be able to communicate with you and send you targeted offers. We therefore process your personal data for marketing purposes, namely to communicate personal and relevant information with you and to provide you with offers about our products and services, for example via letters, emails, social media and other digital channels.

If you have an existing customer relationship with FOREX, the legal basis for processing your personal data for marketing purposes is our *legitimate interest* in communicating personal and relevant information and offers to you. We consider that our legitimate interest in this case outweighs the rights and freedoms of the data subjects.

If you are not a FOREX customer, we will only send marketing via email and text messages, etc. after you have given your consent in advance. If you have given such consent, the legal basis for our processing of personal data is the consent you have given. FOREX may also send direct marketing with offers to companies. The processing of personal data associated with such mailings takes place on the legal basis of legitimate interest, where we have made the assessment that our interest in targeting relevant offers to companies outweighs the rights and freedoms of the recipients.

Regardless of whether you are a customer or not, you can unsubscribe from future mailings at any time.

The following personal data is processed for this purpose:

- Identity data, such as name, personal identity number and customer number.
- Contact information, such as email address, telephone number and address.
- Customer interactions and engagement: Such as communication between you and FOREX and information about which products and services you have.



• Digital information related to your use of our website, other platforms and digital applications including traffic data, location data, behavioural data and other communication information.

Further information about our direct marketing can be found in section 7 below.

4.6 Business development, market and customer analysis, and training.

We carry out various types of market and customer analyses on an ongoing basis in order to develop our products, services and offers. We may therefore process your personal data on a general level for the purpose of producing reports and statistics for the purpose of monitoring and evaluating our activities.

The purpose of this is improving our product and service offering, optimising our various offers, adapting content, marketing and improving the user experience. Your personal data is also processed for the purpose of training our staff and developing our customer service.

For this purpose, we process your personal data on the basis of our *legitimate interest*, namely our interest in following up and evaluating our business, offers and marketing. We consider that our legitimate interest in this case outweighs the rights and freedoms of the data subjects.

On certain occasions, FOREX also asks for your consent to process your personal data. This may be, for example, in the case of certain processing of special categories of personal data and in the case of certain mailings for marketing purposes.

The following personal data is processed for this purpose:

- Identity data, such as name, personal identity number and customer number.
- Contact information, such as email address, telephone number and address.
- Customer interactions and engagement: Such as communication between you and FOREX, call recordings, notes about you as a customer and information about the products and services you have.
- Financial information, such as transactions, credits, income and liabilities.
- Digital information related to your use of our website, other platforms and digital applications including traffic data, location data, behavioural data and other communication information.

### 4.7 Investigation and security reasons

We process your personal data for investigation and security reasons such as preventing, detecting and reporting fraud and protecting your assets and those of FOREX. We also need to check data against sanctions lists in order to detect, prevent, manage and minimise risks of financial crime. In addition, we need to protect your interests and those of FOREX and FOREX employees, which includes various physical security measures and camera surveillance.

We also process their personal data to improve, develop and manage the security of our technical systems and IT infrastructure, and to perform various risk assessments.



For these purposes, we process your personal data on the basis of our *legitimate interest*, namely our interest in ensuring a high level of security for natural persons and assets and in being able to investigate and follow up on any security incidents. We consider that our legitimate interest in this case outweighs the rights and freedoms of the data subjects.

Some processing of this type also takes place in order for FOREX to be able to fulfil its legal obligations, as further described in section 4.8 below.

The following personal data is processed for this purpose:

- Identity data, such as name, personal identity number and customer number.
- Contact information, such as email address, telephone number and address.
- Customer interactions and engagement: Such as communication between you and FOREX, call recordings, notes about you as a customer and information about the products and services you have.
- Financial information, such as transactions, credits, income and liabilities.
- Data on credibility: Such as payment behaviour, data that enables FOREX to conduct investigations regarding money laundering and the prevention of the financing of terrorism and to ensure compliance with international sanctions and whether you are a politically exposed person.
- Digital information related to your use of our website, other platforms and digital applications including IP address, traffic data, location data, behavioural data and other communication information.

### 4.8 Fulfilment of legal obligations

In certain cases, FOREX is obliged by law to process personal data in order to fulfil legal obligations in relation to both Swedish and foreign authorities, including but not limited to the Swedish Financial Supervisory Authority, the Police, the Swedish Tax Agency, the Swedish Pensions Agency and the Swedish Enforcement Authority. FOREX is also obliged to ensure that controls are carried out in accordance with the rules on accounting, the Money Laundering Act and other applicable regulations concerning payment services, transaction monitoring and fraud control. FOREX may check customer information against sanctions lists that we are obliged or entitled to apply by law or official decision in order to ensure that there are no deficient conditions for performing certain payment services.

For these purposes, we need to check and verify your identity, monitor and analyse how you use your accounts in order to prevent or detect fraud, money laundering and other crimes and to fulfil our obligations under the Money Laundering Act and to document and store personal data related to credit checks.

For these purposes, your personal data may also be disclosed to both Swedish and foreign authorities, including but not limited to the Swedish Financial Supervisory Authority, the Police, the Swedish Tax Agency, the Swedish Pension Agency and the Swedish Enforcement Authority.

The processing of your personal data for the aforementioned purposes takes place for us to fulfil our legal obligations.



We process the following personal data we process for the above purposes:

- Identity data: Such as name, date of birth, personal identity number, IP number, customer number, citizenship.
- Your details: Such as e-mail address, telephone number, address.
- Financial information: Such as ownership details, transactions, credits, executed transactions, income, liabilities.
- Data on credibility: Such as payment behaviour, data that enables FOREX to conduct investigations regarding money laundering and the prevention of the financing of terrorism and to ensure compliance with international sanctions and whether you are a politically exposed person.
- Customer interactions and engagement: Such as communication between you and FOREX, call recordings, notes about you as a customer and information about the products and services you have.
- Digital information related to your use of our website, other platforms and digital applications including traffic data, location data, behavioural data and other communication information.

# 4.9 Establishment, assertion and exercise of legal claims

FOREX may process your personal data for the purpose of establishing, exercising or exercising legal claims, for example to process complaints, in connection with legal proceedings or otherwise to prevent the use of FOREX products and services in violation of applicable terms and conditions.

For these purposes, we process your personal data on the basis of our *legitimate interest*, namely our interest in safeguarding our rights and defending ourselves against complaints or legal claims. We consider that our legitimate interest in this case outweighs the rights and freedoms of the data subjects.

We process the following personal data we process for the above purposes:

- Identity data: Such as name, date of birth, personal identity number, IP number, customer number, citizenship.
- Your details: Such as e-mail address, telephone number, address.
- Financial information: Such as ownership details, transactions, credits, executed transactions, income, liabilities.
- Data on credibility: Such as payment behaviour, data that enables FOREX to conduct investigations regarding money laundering and the prevention of the financing of terrorism and to ensure compliance with international sanctions and whether you are a politically exposed person.
- Customer interactions and engagement: Such as communication between you and FOREX, call recordings, notes about you as a customer and information about the products and services you have.
- Digital information related to your use of our website, other platforms and digital applications including traffic data, location data, behavioural data and other communication information.



### 5. HOW LONG IS YOUR DATA STORED?

How long we store your personal data depends on the purpose for which the data is used.

- a) If you are a customer of FOREX, for example through currency exchange or online currency, we store your personal data for as long as the customer relationship is ongoing, i.e. for the entire duration of the agreement between you and FOREX. Upon termination of the customer relationship and the agreement, FOREX may store your data for a further ten (10) years, for the purpose of fulfilling legal obligations under applicable archiving and accounting legislation and in order to be able to assert any legal claims, exercise our rights and fulfil our obligations in relation to any claims and questions from previous currency exchange customers and in relation to authorities.
- b) If you are in contact with FOREX but do not enter into an agreement and thus do not become a customer, your personal data will generally be stored for a maximum of three (3) months, unless further processing is necessary as a result of a legal obligation incumbent on FOREX.
- c) If you, as a customer, do not object to receiving direct marketing, we process your personal data for marketing purposes for the duration of the customer relationship and for a period of not more than twenty-four (24) months from the last customer engagement. However, your personal data will be deleted immediately if you unsubscribe from receiving direct marketing, unless FOREX has another legal basis to support the processing.
- d) If you have not become a customer, but have consented to receiving direct marketing from FOREX, we process your personal data for marketing purposes for a period of three (3) years. However, your personal data will be deleted immediately if you unsubscribe from receiving direct marketing, unless FOREX has another legal basis to support the processing.

For more information about the retention periods of certain identity data and digital information related to your use of our website, other platforms and digital applications, please see our cookie policy available at <a href="https://www.forex.se/en/customer-service/Terms-and-policies/">www.forex.se/en/customer-service/Terms-and-policies/</a>.

For personal data linked to a scanned ID document, such as name and personal identification number, the main rule is that the data must not be stored if the bill of exchange transaction falls below the threshold value. However, an exception is made if the ID document is judged to be invalid or suspected to be falsified. In this case, a copy of an ID is stored for a maximum of thirty (30) days before it is deleted. The purpose of the retention is for us to be able to hand over the copy of the ID to the police in the event of a suspected offence in accordance with the Money Laundering Act.

After the time periods indicated above, FOREX will securely delete or de-identify your personal data so that it can no longer be linked to you.

### 6. SPECIFICALLY FOR YOU AS A CURRENCY CUSTOMER

As a currency customer, FOREX may request your contact details such as e-mail address and telephone number. You choose whether you wish to provide your contact details and, if so, which ones. If your consent is requested in the store, you will also receive additional information



about the purpose and manner in which the personal data will be processed. The contact details you provide may be used to reach you with information about the service you are using. The data may also be used for direct marketing and offers via email and text message concerning similar products or services from FOREX. The mailings will only be sent as long as you do not opt-out of future marketing.

Among other things, you can buy and sell currency at our exchange offices. If you wish to carry out an individual or several separate transactions with us, and if you otherwise wish to enter into a business relationship with FOREX, we may need to check your identity, age and principal. For example, in accordance with the Money Laundering Act we are obliged to identify our customers and check their identity when establishing a permanent customer relationship. The same obligation applies to individual transactions that exceed the amounts mentioned in the third chapter of the Money Laundering Act (so-called "thresholds") or to individual transactions that we otherwise suspect or have reasonable grounds to suspect constitute an element of money laundering or the financing of terrorism and which we are therefore obliged to report in accordance with the Money Laundering Act. Suspicious transactions include transactions that are exceptional in terms of their economic value.

In addition, we may need to check whether you are a politically exposed person and which country your business is established in, perform checks against European sanctions lists and obtain information about the purpose and nature of the business relationship. FOREX is obliged to carry out these measures as part of our work against money laundering risks and the financing of terrorism, and to fulfil the requirements for customer due diligence and customer relations set out in the Money Laundering Act. Such data is processed on the basis of legal obligations, see section 4.8 above.

You are not obliged to disclose your personal data to us, but if you choose not to do so, FOREX may not be able to offer currency services. When assessing risks and deviations relating to transactions, FOREX may be obliged to report to the finance police. Information in such reports is confidential.

FOREX may request that you show ID to verify your age – we are not able to enter into agreements with persons under the age of 16 (Sweden and Norway) and 15 (Finland and Denmark).

### 7. MARKETING

#### 7.1 General

In accordance with what has been set out under point 4.5 above, we may process your personal data for marketing purposes, namely to communicate personal and relevant information with you and to provide offers to you regarding our products and services, for example via letters, email, social media and other digital channels.

As stated in section 4.6, we also conduct various types of market and customer analyses on an ongoing basis and we may therefore also process your personal data for the purpose of optimising our various offers, adapting our content and marketing.

### 7.2 Unsubscribing from direct marketing



You have the right to object at any time, free of charge, to FOREX's processing of your personal data for the purpose of sending you direct marketing messages. This applies regardless of whether you receive communication to your company address, are an existing or former customer of FOREX or because you have otherwise consented to it in advance. You can unsubscribe from future mailings by following the link in the email or by sending your request to info@forex.se or by post to FOREX AB, Stora Nygatan 27, 111 27 Stockholm, Sweden.

Advertising that does not constitute direct marketing, for example by letter, may be sent to you whether or not you are a customer, provided that you have not signed up for a restriction service or otherwise opted out of such advertising.

### 7.3 Profiling

Profiling refers to the automated processing of personal data that is used to assess certain personal characteristics of a natural person, in particular to analyse or predict, for example, their financial situation, personal preferences, interests and location.

FOREX uses profiling to be able to deliver customised marketing to you. Profiling consists of, for example, internal categorisation and analysis of customer groups, consumer and customer behaviour at a general level.

In addition, profiling is carried out for documentation and statistical conclusions on customer analysis prior to marketing, method and business development. The personal data processed is such data that you have provided to FOREX and supplementary data from public registers such as the Swedish state personal address register (SPAR), other authorities and financial institutions.

Profiling may result in you receiving marketing tailored to you.

The legal grounds on which we base this processing are described in sections 4.5 and 4.6 above.

When profiling is supported by the legal basis of legitimate interest, you have the right to object to profiling at any time. FOREX may then no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing that outweigh your interests, rights and freedoms or if it is for the establishment, exercise or defence of legal claims.

#### 8. PROCESSING BY OTHER PARTIES

FOREX may disclose your personal data to authorities in order to comply with laws or other regulations relating to, for example, taxes, the prevention of money laundering or the financing of terrorism. FOREX may also disclose your personal data in order to provide our services and otherwise conduct our business, for example suppliers of IT services, payment services, administration and finance, etc.

In order to fulfil product and service agreements, FOREX may disclose personal data relating to you to other companies in the FOREX Group and sometimes to external companies we collaborate with, such as payment intermediaries, payment recipients, clearing centres, suppliers and to parties acting on your behalf.



The categories of recipients of personal data are:

- Authorities: tax authorities, regulatory authorities and judicial authorities.
  - Sharing of personal data with authorities takes place when FOREX is required to do so by law. An examples of a legal obligation to provide information is taking measures against money laundering and terrorist financing. Personal data is only transferred if there is a legal basis to support the processing, which in the present situation is that the processing is necessary to fulfil a legal obligation, fulfil the agreement or that FOREX has a legitimate interest in protecting both you and FOREX's operations.
- Companies within the FOREX Group: We share personal data internally within our Group if it is necessary for FOREX to provide its services and functionalities to you and provided that this is permitted by law.
  - FOREX has a legitimate interest in being able to access and provide these services, and this may also be necessary for FOREX to be able to fulfil contractual obligations towards you as a customer.
- Suppliers, subcontractors and partners: These are companies that are only entitled to
  process your personal data on behalf of FOREX and in accordance with our instructions,
  called "data processors". Examples include suppliers of software and data storage
  providers, business consultants, marketing and analysis partners, and companies that
  assist FOREX with the development and improvement of the products and services we
  provide.

FOREX has a legitimate interest in obtaining access to services and functionality that FOREX itself cannot offer. We ensure that all processing by our suppliers and partners is necessary to fulfil this interest and that the interest outweighs your right not to have your data processed for this purpose.

### TRANSFER OF PERSONAL DATA OUTSIDE THE EU/EEA

In certain cases, FOREX is obliged, in cooperation with authorities, to transfer personal data abroad and outside the European Union and the European Economic Area ("EU" and "EEA" respectively). Transfers may also take place to companies with which FOREX collaborates to provide its services, such as suppliers, subcontractors and partners outside the EU/EEA.

In cases where personal data for which FOREX is responsible will be transferred to a country outside the EU/EEA, the transfer takes place in accordance with the GDPR and other supplementary legislation, such as the Data Protection Act, in order to maintain equivalent privacy protection. For example, a transfer may take place if there is a decision from the European Commission that the country in question ensures an adequate level of protection. In the absence of such a decision, appropriate safeguards can be taken, for example by the receiving organisation abroad acting under legally binding standard contractual clauses or company regulations. In the absence of such appropriate safeguards, exceptions to the transfer may be made in certain special situations, for example by FOREX obtaining special permission



from the supervisory authority or your express consent to the transfer of personal data. Where your consent to such transfer is requested, you will be informed of any risks associated with the transfer.

If you wish to receive more information about applicable safeguards when transferring your personal data outside the EU/EEA, please contact us at dataskyddsombud@forex.se.

### 10. YOUR RIGHTS

### 10.1 Right of access

You have the right to request a register extract free of charge, which contains a summary of the personal data processed about you by FOREX and information on how the processing is carried out. To ensure a high level of security and that the register extract reaches the correct recipient, the register extract will be sent to you by registered letter.

In some cases, the right of access may be restricted, for example due to other legislation if it concerns confidential information or business secrets. Internal information that is part of preparatory work to ensure proper case handling or information that is kept secret to prevent, investigate and reveal criminal activity are other examples of when access to information is restricted.

# 10.2 Right to rectification

You have the right to request rectification of personal data, which means that we will correct or supplement inaccurate data.

# 10.3 Right to erasure

In certain cases, you have the right to have your personal data deleted without undue delay. You have the right to have your personal data deleted if:

- a. the personal data is no longer necessary for us to process for the purpose for which it was collected;
- b. you withdraw your consent on which the processing is based and there is no other legal basis to support the processing;
- c. if you object to the processing of the data based on our legitimate interest and there are no legitimate reasons that outweigh your interest in having your data protected;
- d. you object to processing for direct marketing purposes;
- e. the personal data has been processed in an unlawful manner.

To the extent that it is necessary to continue processing your personal data, for example to fulfil our legal obligations, we are not obliged to delete your personal data. This means that certain data may be stored until we are no longer obliged to process it.

### 10.4 Right to restriction

In certain cases, you have the right to request that our processing of your personal data be restricted. A restriction can be imposed for several reasons.



- a. If you believe that the personal data we process about you is inaccurate and you have requested rectification, you can request that processing be restricted during the time we are working to check whether the personal data is correct.
- b. The processing is unlawful and you object to the erasure of the personal data and instead request a restriction of its use.
- c. We no longer need the personal data for the purposes of the processing, but you need it to establish, exercise or defend legal claims.
- d. If you have objected to processing based on a balancing of interests (legitimate interest), you can request limited processing during the time we are working to check whether our legitimate interests outweigh your legitimate interests.

In the event that processing has been restricted in accordance with one of the above situations, we may only process the data in addition to the actual storage in order to establish, exercise or defend legal claims, to protect the rights of another person or because you have given your consent.

# 10.5 Right to data portability

In certain cases, you have the right to data portability, i.e. the right to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format and the right to transfer this data to another data controller. A prerequisite for data portability is that the transfer is technically feasible and can take place automatically and that we process the personal data on the basis of your consent or in order to fulfil a contract.

# 10.6 Right to objection

You have the right to object at any time to FOREX processing of your personal data based on a balance of interests as a legal basis (legitimate interest). The continued processing of your personal data requires that we demonstrate a legitimate reason for the processing in question. Otherwise, we may only process the data for the establishment, exercise or defence of legal claims. For reasons relating to the customer's specific situation, the customer also has the right to object to profiling and other processing of personal data concerning you, where the processing of the data is based on the customer relationship.

As a data subject, you also have the right to not be subject to decisions based solely on automated decision-making, if such decision-making has legal consequences or in a similar way significantly affects the customer. You have the right to object to such processing, including profiling. However, this right does not apply if the decision-making is necessary for the conclusion or fulfilment of a contract with the customer or if the customer has given express consent.

# 10.7 Right to withdraw consent

If you have given us your consent for the processing of your personal data, you have the right to withdraw your consent at any time. You can withdraw your consent by contacting us via the contact details above. However, such a revocation will not affect the lawfulness of the processing carried out up to the point of revocation.

#### 11. DATA PROTECTION OFFICER



FOREX has appointed a data protection officer who monitors and checks that all personal data processing takes place in accordance with the GDPR and other supplementary legislation. If you cannot find the information you are looking for in this Privacy Policy, or if you otherwise have questions regarding how your personal data is processed by FOREX, you have the option of contacting our data protection officer via e-mail: dataskyddsombud@forex.se or by telephone +46 771–22 22 21 (customer service).

### 12. COMPLAINTS

The Swedish Authority for Privacy Protection ("IMY") is responsible for monitoring the application of the GDPR and other complementary legislation. If you believe that FOREX handles personal data incorrectly, you can submit a complaint to IMY via IMY@IMY.se or by telephone on +46 (0) 8 – 657 61 00.

### 13. AMENDMENTS

This Privacy Policy may be subject to change from time to time. In the event of amendments, an updated version of the privacy information will be made available at <a href="https://www.forex.se/en/">www.forex.se/en/</a>.

and otherwise communicated with you in an appropriate manner in accordance with the requirements set out in the GDPR.

Last updated June 12, 2024.