

## General Information on AS SEB Pank

### 1. General information on AS SEB Pank (hereinafter “the Bank” or “SEB”) and on the services offered by the Bank

The Bank operates in Estonia on the basis of an activity license as a credit institution and is allowed to provide banking and investment services. In addition, the Bank is authorised to provide personal pension savings products. As regards investment services, the Bank offers the following:

- acceptance and forwarding orders relating to securities;
- execution of orders on behalf or at the account of clients;
- trading in securities for its own account;
- management of a securities portfolio;
- investment advice;
- organisation of offerings or issues of securities.

The Bank belongs to the Skandinaviska Enskilda Banken AB Group. Further details regarding general information on the Bank, including information on organisation structure, management and shareholders, [are available at: >>](#)

The activity licence of SEB has been issued and supervision over the activities of SEB is performed by the Financial Supervisory Authority, Sakala 4, 15030 Tallinn, Republic of Estonia, [www.fi.ee](http://www.fi.ee).

### 2. Language and forwarding of information

In communication and documents between the Bank and its clients Estonian, Russian and English are used, unless agreed otherwise. Upon respective consent, the Bank provides the client with information about investment services electronically and/or on paper via: e-mail, the U-Net Internet bank or U-Net Business, bank offices or the Bank’s website.

### 3. Processing personal data

According to the Personal Data Protection Act, personal data is any data concerning a natural person, regardless of the form or format in which such data exists (name, personal identification code, address, audio or visual data, etc.) When processing the personal data of clients collected by the Bank (either submitted by the clients themselves or obtained in any other way), the Bank shall proceed from the provisions set forth in legislation (in particular, the Credit Institutions Act and the Personal Data Protection Act), the General Terms and Conditions of the Bank (clause 4.2) and the contracts signed with the client.

The Bank shall process personal data to the extent that it is necessary for the performance of the contract signed with the client and rendering the services related thereto. The Bank may also process such data in order to enable it to perform its other legal obligations. The Bank also processes client data for the purpose of conducting statistical surveys and analyses of the market shares and other financial indicators of client groups, products and services, and risk management.

The Bank has the right to process personal data within the SEB Group with the aim of effectively using personal data and financial information in order to provide the client with harmonised financial services. The Bank may use client data for the purpose of providing and advertising the products or services of a legal person belonging to the SEB Group or, on rare occasions, another contractual partner. The Bank is entitled to save any notifications, applications, orders and other operations forwarded by the client via any means of communication and the personal data contained therein. In order to retain up-to-date records and improve the service to its clients, the Bank may complement its client records through use of public databases or state or local authority databases.

In the cases specified by law the Bank may be obligated to disclose client data to competent persons or authorities, e.g. the Financial Supervision Authority. A client who objects to the processing of its personal data for the purpose of the Bank’s direct advertising, or wishes to request information

regarding the personal data processed by the Bank in relation to it, or request a correction of incorrect personal data held by the Bank, shall submit a written and personally signed request to the Bank.

#### **4. Complaints and claims**

##### **4.1 Filing a complaint**

If the client is not satisfied with the information given or services rendered by the Bank, the client shall address a customer representative via a bank branch, electronic channel or telephone bank for the purpose of resolution of the complaint. A complaint is submitted to the Bank via direct contact orally or by a written notice. A customer representative identifies the substance and essence of the complaint and tries to resolve the complaint immediately or, if necessary, refers the complaint to a competent bank employee or department. It will be attempted to resolve a complaint in favour of the client as soon as possible.

The customer support and assistance unit is the Bank's Customer Support Department (address: Tornimäe 2, 15010 Tallinn, phone +372 665 5100). Clients who wish to talk to an independent party may contact the local FIN-Net body, this being the EC and EEA financial services consumer complaints handling network. Local contacts can be found by visiting the FIN-Net website, [http://ec.europa.eu/internal\\_market/finservicesretail/finnet/index\\_en.htm](http://ec.europa.eu/internal_market/finservicesretail/finnet/index_en.htm).

##### **4.2 Service documentation**

The client is recommended to keep all documentation provided to it by SEB, such as transaction confirmations, periodic statements, prospectuses and the like. They should also keep records of any instructions or orders which they may have given to the Bank, for example by retaining notes, photo copies, copies of electronic records and the like.

##### **4.3 Disputes**

Any disputes between the client and the Bank shall be subject to resolution by way of negotiations. Failing agreement, the interested party shall file a claim with a court. Upon filing an action with a court, it is advisable to use legal assistance in order to assess the case and its possible outcome. Clients considering initiating such proceedings should consider that SEB Pank will contest such claims vigorously, to the full extent of the law, in all cases where it believes that it has fulfilled its obligations and that its actions have been beyond reproach.