

# SEB's Terms and Conditions for Processing Personal Data

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## SEB's Terms and Conditions for Processing Personal Data

SEB's greatest value is reliable relationships with customers and individuals who want to establish an employment relationship with SEB. In order to provide you better service and to properly fulfil all contractual relations and legal requirements, we collect and retain your personal data in accordance with the legislation. We handle the information you have entrusted to SEB with full care and responsibility. When processing personal data, SEB is guided by the EU General Data Protection Regulation (EU 2016/679) (hereinafter "GDPR"), the Personal Data Protection Act and other applicable legislation. This document provides an overview of how and for what purposes SEB processes your data and what your rights are and how you can exercise them.

### 1. General Principles

- 1.1 SEB processes your personal data in accordance with these terms and conditions for processing personal data (hereinafter "Terms and Conditions"). The Terms and Conditions apply to you if you are a customer or have expressed your intention to use SEB's products or services, visit our website, apply for a job at SEB or have signed up with SEB's Talent Academy (see clause 11 Data Processing when applying for a job).
- 1.2 Additional requirements and conditions for processing your personal data may be agreed upon in agreements concluded with you. In the event of any inconsistency, first, the additional requirements specified in an agreement shall apply, followed by the Terms and Conditions.
- 1.3 The processing of personal data within SEB Group is governed by mutual personal data processing agreements which specify at least the purpose, scope, means and liability of processing the personal data. SEB may transfer your data to other SEB Group companies with your consent or also to third parties for the fulfilment of obligations arising from legislation (for example, a requirement arising from the Money Laundering and Terrorist Financing Prevention Act).
- 1.4 SEB ensures secure processing of personal data by implementing the best practices and international standards for providing IT services and information security. SEB also requires the implementation of the necessary organisational, physical, and IT security measures from their partners and other SEB Group companies to whom personal data is forwarded in accordance with these Terms and Conditions.
- 1.5 If SEB amends the terms and conditions of processing personal data, it publishes the amendments on the website of SEB at [www.seb.ee](http://www.seb.ee) at least one month before they enter into force.
- 1.6 The contact address of the Data Protection Officer of SEB is [dpo@seb.ee](mailto:dpo@seb.ee). Other contact details are available at [www.seb.ee](http://www.seb.ee).

## 2. Terms and Definitions

**Personal Data** (hereinafter also the "Data") are any information on a person that enable to directly or indirectly identify that person. It is possible to identify a person directly, for example, by name or personal identification code, indirectly, for example, by location information, network identifier or physiological, genetic, mental, economic, cultural or social characteristics.<sup>1</sup>

**Special categories of personal data** are personal data, which reveal the racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, biometric data for the purpose of uniquely identifying a natural person (such as irises, face recognition or finger print), data concerning health or data concerning a person's sex life or sexual orientation.

**Customer** is a person who has expressed their wish to use the services of the bank (e.g., submitted an application for entering into an agreement) or who uses or has used a service provided by the bank or is otherwise connected to the services provided by the bank (e.g., insured person in an insurance agreement, representative of a legal person, provider of collateral to an agreement, beneficiary or remitter, who are customers of another payment institution).

**A decision based on automated processing** is made with IT tools without human intervention, which allows decisions to be made faster.

**Profiling** means automated processing of personal data, during which SEB assesses the circumstances related to you (e.g., age, gender) in order to predict your personal preferences and possible pattern of behaviour.

**SEB** means an undertaking or a branch, belonging to SEB Group that is registered in Estonia: AS SEB Pank, AS SEB Liising, SEB Life and Pension Baltic SE Estonia branch, AS SEB Varahaldus, MTÜ SEB Heategevusfond, and AS Rentacar.

**SEB Group** is Skandinaviska Enskilda Banken AB (publ) and all its subsidiaries.

**Service** is any service provided or offered by SEB and its chosen partner, which SEB provides or mediates to the customer in the branch office, mobile application, on the website, by phone or video or in other channels.

**Terms and Conditions** is a document, which describes the terms and conditions of processing personal data at SEB.

**Job applicant** is a person who has expressed his or her wish to apply for a job at SEB.

**Processing** means any operation performed on personal data manually or automatically (such as collecting, recording, retaining, using, transmitting and deleting data).

## 3. Categories of personal data being processed and sources

3.1 SEB mainly processes the following personal data in its activity (the list is not exhaustive).

**Data on the right of representation**, e.g., information on the legal representative (e.g., parent, guardian or member of the management board of a legal person) and the person represented (child or ward), relationship with the successor or bequeather;

**Audio-visual data**, e.g., video and audio recordings, CCTV recordings, photos taken by ATM cameras, photo and video recordings made during the establishment of initial customer relationship through video meetings to establish the identity;

**Biometric data**, e.g., photo and video recordings made during the establishment of initial customer relationship via mobile application to establish the identity;

**Financial data**, e.g., income, assets, liabilities, investment goals, risk tolerance, previous payment behaviour, information on payment default, transactions on the account, information on the performance of concluded agreements;

**Education and experience**, e.g., school education, insurance experience, investment knowledge and experience;

**Identification data**, e.g., name and surname, personal identification code, date of birth, citizenship, identity document data, face image, photo, Internet Bank login data;

**Contact data**, e.g., phone number, address, e-mail address, preferred communication channel, communication language;

**Account information and payment initiation data (API)**, e.g., data on IBAN in another bank, currency, balance, account statement, IP address, web browser, payment amount, remitter's name;

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<sup>1</sup> For details, see Article 4 (1) of the GDPR: personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, personal identification code, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**KredEx guarantee target group data**, studies' data, data on serving in the Defence Forces, birth certificate data of a minor child;

**Payment default information**, e.g., debt amount, duration of debt, payment default data, past and present debts owed to SEB and other financial institutions, information on the concluded underlying agreement, date on which the default occurred and ended;

**Information related to payment transactions**, such as name of the remitter and beneficiary, account number, account balance, transaction amount, transaction limits, payment explanation, ATM transaction data, payment inquiries, chargebacks;

**Residence for tax purposes**, e.g., country of residence, tax identification number;

Family data, e.g., marital status, number of dependants;

**Communication data**, e.g., recordings of calls and meetings with an SEB employee, data on data exchange, incl. forwarded correspondence/documents;

**Offence data**, information on economic, proprietary, professional and other offenses in the commission of which financial services are or may be used (e.g., terrorist financing), decisions made in relation to the offense with the grounds thereof, pending offenses;

**Data related to the use of service or visiting the SEB website**, such as data on transactions made in Internet Bank and mobile application, activity logs, login information, cookies and IP address, location, web browser information, information about used services, service activity, preference, habits, satisfaction, inquiries and complaints made;

**Data related to the activity and origin of assets**, such as studies, workplace, occupation, business information (self-employed), information on payment practices, establishment and termination of business relationships and occasional transactions;

**Your affiliation with legal entities**, such as the beneficial owner, a member of the management or supervisory board, a counterparty.

**Details of private persons related to you**, e.g., beneficiaries in the insurance contract, provider of collateral, beneficiary of the guarantee/letter of credit, successors, persons indicated in the vehicle registration certificate (in case of a lease contract);

**Health data\***, e.g., medical history, results of examinations, diagnoses, assigned treatment;

**Data related to securities and pension systems**, e.g., amount and currency, volumes and values of transactions, other information that may be requested by the registrar of the securities register or the pension register based on legislation.

*\*Health data, which are special category of personal data, are processed by SEB Life and Pension Baltic SE Estonia branch in its main activity as the provider of insurance service. Health data may also be processed by other SEB companies if you or persons related to you disclose this data when using the service (for example, when applying for a grace period due to health reasons. Processing of health data is necessary in such situations, as our decision is based on the information given by you or your representative).*

3.2 SEB receives your personal data mainly in the following ways:

**from you** when you submit requests, applications and other mandatory document forms required by the service agreement for the preparation and/or conclusion of agreements. If necessary, SEB will ask you to provide additional information (e.g., to prevent money laundering or assess creditworthiness);

**When providing the service**, if you use SEB's service (e.g., make transfers, card payments, place securities orders and make other operations related to the services), when communicating with SEB in the course of customer communication (e.g., recordings of phone calls, communication by e-mail, data and documents submitted in the course of communication) or, if you are otherwise connected to the service provided by SEB (e.g., person insured/beneficiary in the insurance contract, provider of collateral, guaranteed person, co-borrower, beneficiary of guarantee/letter of credit, representative of legal person, signatory of account, ultimate beneficial owner, etc.).

**from other sources**, such as:

- other financial institutions, e.g., correspondent banks, payment service providers, securities intermediaries;
- SEB Group companies;
- health care providers;
- public and private registers (such as Commercial Register, registers maintained by the Tax and Customs Board, Population Register, Land Register, register of securities, registers maintained by the Police and Border Guard Board, payment default register);
- public sources (e.g., Internet search engines);

## 4. Purposes and legal basis of personal data processing

SEB processes your data only, if we have a clear purpose, processing is justified and there is legal basis for processing. We collect and process your data within the extent which is necessary for the fulfilment of defined objectives. We process your data for the following legal bases and main purposes (the list of purposes is not exhaustive):

- 4.1 **For the performance of contract** – the need to prepare an agreement to be concluded with you or on your behalf (e.g., to establish the identity, process an application, prepare a credit decision, etc.), perform the concluded agreement (e.g., make payments, communicate contract-related information) and manage the agreement (e.g., administer, store, archive, etc. in the banking system);
- 4.2 **On the basis of law** – in order to fulfil the obligations arising from legislation, such as different Estonian and European Union legislation; also, there are various obligations established to SEB, arising from the instructions of regulatory authorities to process customers' data. For example, SEB has to follow the Money Laundering and Terrorist Financing Prevention Act, the International Sanctions Act, the responsible lending principle, arising from the Law of Obligations Act and Credit Institutions Act, when providing the payment and financial services, the requirements arising from the Securities Market Act, Payment Institutions and E-money Institutions Act, Funded Pensions Act and Credit Institutions Act.
- 4.3 **On the basis of consent** – on some occasions, SEB processes your personal data also on the basis of voluntary consent (e.g., for sending direct marketing messages). The content, scope, and purposes of processing are specified in the described consent, which you may withdraw at any time. Withdrawal of consent does not affect the data processing that has already taken place, but SEB will not continue the processing of your data, unless there is another legal basis for this.
- 4.4 **Based on legitimate interest** – processing of personal data is necessary based on the legitimate interest of SEB or a third party related to its business activities; however, provided that the legitimate interest of SEB or a third party in no case outweighs your fundamental rights and freedoms. Legitimate interest may include e.g., ensuring security (implementing security measures to protect the interests of a customer and SEB's employees), researching customers' consumption habits to improve the service experience and provide suitable services and secure remote channel solutions (incl. improvement and development of SEB website, Internet Bank, mobile application, etc.), in proving and defending SEB's claims in court or out of court.

The below table sets out the general cases of personal data processing – the main purposes of data processing, a list of categories of personal data and the legal basis for processing.

Purpose	Category of data	Legal basis	Data obtained from
<b>For establishing your identity when providing the services.</b> Please note! If initial customer relationship is established via SEB's mobile application, the analysis of your presented photo and video images will be performed using special technological tools that allow personal identification on the basis of biometric parameters.	Personal identification data Biometric data	Money Laundering and Terrorist Financing Prevention Act; Agreement; Consent	You
<b>For providing the service (incl. to assess your submitted applications) and due performance</b> (incl. for the conclusion, preparation, performance of agreements, exchange of information in the branch office or via a website, Internet Bank, mobile application, phone, video meeting, e-mail or postal service).	Personal identification data Contact information Financial data Family data Job profile Data on the right of representation Data on the target group of KredEx guarantee Data of persons related to you Information related to payment transactions Data on securities and pension system Data on account information and payment initiation (API) Audio-visual data	Agreement; Law (e.g., Creditors and Credit Intermediaries Act, Credit Institutions Act, Insurance Activities Act, Accounting Act, Securities Market Act)	You Other sources
<b>For advisory services and fulfilment of contractual information obligations, e.g., investment advice, portfolio management</b>	Personal identification data Audio-visual data Data relating to securities and pension system  Education and experience Family data	Agreement; Law (e.g., Securities Market Act, Insurance Activities Act, Law of Obligations Act); legitimate interest	You During providing the services

<b>For the prevention of money laundering and terrorist financing and implementation of international sanctions</b> , inter alia for implementing diligence measures upon establishment and monitoring of business relationship	Personal identification data Contact information Education and experience Data relating to activities and the origin of funds Job profile Your affiliation with legal persons Data on securities and pension system Data on the right of representation Data relating to the use of service Data on offence	Money Laundering and Terrorist Financing Prevention Act; International Sanctions Act	You During providing the services Other sources
<b>For exchanging tax information</b> for the compliance with the Tax Information Exchange Act	Personal identification data Residence for tax purpose Contact information Information related to payment transactions Data on securities and pension system	Tax Information Exchange Act	You During providing the services
<b>For the assessment of suitability and relevance when providing the investment, credit, securities or insurance services</b>	Financial data Education and experience Job profile Data relating to securities and pension system	Securities Market Act, Insurance Activities Act, Creditors and Credit Intermediaries Act, Law of Obligations Act, Commission Delegated Regulation (EU) 2017/565	You During providing the services
<b>For disclosure of debt data in the payment default register to Creditinfo Eesti AS</b> (disclosure of debt data of at least 30 euros and overdue for 45 days in the payment default register)	Payment default data	Legitimate interest	You During providing the services
<b>For the assessment of creditworthiness and credit risk management</b> , to ensure responsible lending and efficient risk management	Financial data Payment default data Your affiliation with legal persons Family data Job profile	Creditors and Credit Intermediaries Act Law of Obligations Act, legitimate interest	You During providing the services Other sources (e.g., Creditinfo Eesti AS)
<b>For monitoring the payment transactions</b> to identify tax fraud and preventing misuse, to ensure greater security of the payment service and risk management and to comply with the requirements laid down by the Payment Institutions and E-money Institutions Act	Personal identification data Information related to payment transactions Data relating to the use of service	Commission Delegated Regulation (EU) 2018/389, Credit Institutions Act, Payment Institutions and E-money Institutions Act, Financial Supervision Authority advisory guidelines; Legitimate interest	During provision of services
<b>For monitoring and reporting unusual and suspicious transactions referring to market abuse</b> , to prevent abuse and ensure exchange of information and cooperation in the prevention of money laundering and terrorist financing	Personal identification data Information related to securities transactions Data relating to the use of service Data on securities and pension system	Regulation of the European Parliament and of the Council (EU) No 596/2014 Money Laundering and Terrorist Financing Prevention Act	During provision of services
<b>For promoting SEB's business activity, inter alia, for improving the quality of products and service, developing the systems, offering personalised services and similar products and services to customers.</b> <b>For that, SEB examines and analyses inter alia your consumption patterns, user experience, history of using the service, statistics, etc.</b>	Financial data Data relating to the use of service	Legitimate interest	During providing the services
<b>For mediating information on pension account and investment account for pension</b>	Data on securities and pension systems	Securities Market Act, Funded Pensions Act	You During providing the services Other sources
<b>For sending direct marketing offers</b>	Contact information Data relating to the use of service	Consent; Legitimate interest (for selling similar products or services or for telephone sales)	You During providing the services

<b>For participating in market research</b>	Contact information	Consent	You During providing the services
<b>For conducting campaigns, raffling, lotteries for customers</b>	Contact information Data relating to the use of service Communication Data	Legitimate interest, consent	You During provision of services Other sources
<b>For the provision of assistance to the customer in using a service, for analysing service interruptions</b>	Data relating to the use of service	Legitimate interest, Consent	During providing the services
<b>For ensuring physical security and data- and information security For the protection of customers, employees, and property of SEB</b>	Audiovisual data (CCTV recordings, photo from ATM camera)	Security Act, legitimate interest	During providing the services
<b>For the assessment of insurance risk, conclusion and performance of insurance contract and for claim settlement</b>	Financial data Health data Personal identification data Contact information Data relating to the use of service Communication data Data of loss event	Agreement; Insurance Activities Act, Law of Obligations Act, Consent	You Other sources

## 5. Profiling and automated decision-making

SEB uses profiling and automated decision-making to improve the efficiency of service offering, improve the user experience of services, create suitable offers, advertise all services, etc.

Such data processing may take place either:

- on the basis of customer's consent, e.g., for direct marketing,
- for compliance with legal obligations, e.g., for the fulfilment of an obligation arising from the Money Laundering and Terrorist Financing Prevention Act and Securities Market Act,
- On the basis of SEB's legitimate interests, considering the customer's preferences, e.g., for offering and promoting similar services in case of a customer relationship.

5.1. SEB uses automated decisions when assessing the probability of default and making certain credit decisions (e.g. hire-purchase, small loan), recommending investment services or securities to you when providing the respective investment services (e.g. investment advisory service, robo-advisor service) and offering life insurance products, but also, when establishing a customer relationship via SEB's mobile application, in the course of which biometric data is analysed and it is decided whether your identity is true and whether it is possible to establish a customer relationship via a remote channel.

5.2. You have a right to request reviewing of an offer and/or decision made based on automated processing if you disagree with the offer/decision or its underlying data.

## 6. Transmission of personal data

6.1. When processing your personal data, SEB has a right to transmit your personal data to third parties, i.e., recipients, if there is a purpose and legal basis for that.

6.2. SEB transmits your personal data to the following recipients:

- **Legal persons belonging to SEB Group** for providing their services, for more efficient arrangement of our provided services, for the functioning of group-wide general and risk management systems on the basis of legitimate interest and for the compliance with a legal obligation. The processing of personal data within SEB Group is governed by mutual personal data processing agreements which specify at least the purpose, scope, means and liability of processing the personal data;
- **Authorities** – SEB is obliged to disclose and transmit customer data in order to fulfil obligations arising from legislation and international mutual legal assistance agreements (e.g., transmission of data to investigative bodies, notaries, bankruptcy trustees, bailiffs, Tax and Customs Board, Financial Intelligence Unit, supervisory authorities);
- **Credit and financing institutions**, correspondent banks, custodian banks, payment service providers (parties to the interbank payment systems, e.g. SWIFT, EBA Clearing, European Central Bank), financial intermediaries and trading venues, for the execution of payment, trading or transfer orders and the provision of related services (e.g., guarantees/letters of credit, issued through other banks, collection) and for the provision of reporting services, to assess a person's credibility and risks or to exchange information provided for in the Money Laundering and Terrorist Financing Prevention Act, respectively, in order to fulfil an obligation arising from an agreement and/or law;

- **Companies, persons and organisations to perform agreements concluded with the customer, to provide contractual information and file claims and to provide services** - e.g., international card organisations for processing card transactions, merchants, payment intermediaries, ATM managers, bankcard personalisation service providers, providers of surety, guarantee, owners of collateral, co-borrowers, e-invoice operators, courier and postal service providers, archival centre, customer survey providers, insurers, valuers of collateral and leased items, providers of electronic identification and digital signing services, providers of communications and IT service, SWIFT, handlers of debt claims, SA KredEx, Rural Development Foundation, non-profit organisation Federation of Estonian Student Unions, Ministry of Education and Science, Social Insurance Board in connection with student loan, companies involved in leasing assets,
- **Auditors and legal advisers** – for conducting audits and legal consultations for the fulfilment of legal obligations or on the basis of legitimate interest,
- **Persons maintaining databases and registrars** – e.g., population register, commercial register, depository of securities, pension centre and other registries, which keep the data of customers, payment default register for the purpose of implementing the responsible lending principle, for the fulfilment of legal obligations, legitimate interest or on the basis of your consent.

## 7. Transfer of personal data outside the European Union or the European Economic Area

- 7.1 On certain occasions, SEB may transfer your personal data outside the European Union or the European Economic Area. For example, if the processor involved by SEB is located outside the given region, transmission of personal data is necessary for the provision of service, for implementing measures on the basis of your request (e.g., using correspondent banks for cross-border payments, processing of card transactions by international card organisations Mastercard/Visa).
- 7.2 SEB may transfer your personal data outside the European Union or the European Economic Area only if there is a legal basis for transmitting the data and SEB implements relevant safeguards, such as:
- There is a valid agreement between SEB and the recipient that includes the use of standard data protection clauses developed by the European Commission;
  - A country outside the European Union or the European Economic Area where the recipient is located, has an adequate level of data protection in accordance with the decision of the European Commission.
- 7.3 For more detailed information about the transmission of personal data outside the European Union or the European Economic Area, please contact SEB.

## 8. Use of cookies

- 8.1 SEB uses on its website cookies and other similar applications, which help to identify the behaviour of customers on our website.
- 8.2 The purposes of using the cookies and similar applications and their types are described in a procedure, which is available at [www.seb.ee/kupsised-teade](http://www.seb.ee/kupsised-teade).

## 9. Retention of data

- 9.1 SEB retains personal data for the fulfilment of the data retention obligations stipulated in law and for the establishment, exercise or defence of legal claims based on SEB's legitimate interest.
- 9.2 As a rule, SEB retains
- the personal data collected upon conclusion and performance of the agreements for up to ten years after the termination of the customer relationship (from the moment all agreements concluded with you have ended);
  - audio and/or video recordings for ten years after recording; five years after recording by SEB Liising;
  - CCTV recordings for three months, unless a right or obligation to maintain the records for a different term arises from the legislation;
  - the data that you provide in your applications for establishing customer relationship or using a service or product (e.g., a loan application) and which are not followed by the establishment of a customer relationship or conclusion of a service agreement with SEB, for six months. In certain cases, we must retain the data longer, e.g., pursuant to the Money Laundering and Terrorist Financing Prevention Act;
  - the personal data transmitted to the virtual assistant for 12 months;
  - data on a single transaction (e.g., currency exchange, cash payment to another account), 10 years from the execution of the transaction.

## 10. Customer's rights in connection with personal data processing

- 10.1 You have all the rights arising from the GDPR, incl. the right:
- 10.1.1 to receive information on whether SEB processes your personal data and, if yes, to receive a copy of or access to your personal data. Access to the data may be restricted due to circumstances arising from law, with the rights of other persons to their privacy or for the purpose of protecting SEB's trade secret;
  - 10.1.2 to request immediately the rectification of your personal data if these have changed or are otherwise inaccurate. In the event of changes in personal data, SEB must be notified as soon as possible thereof;
  - 10.1.3 to object to the processing of your personal data, including to profiling;
  - 10.1.4 to restrict processing of your personal data, e.g., at the time when SEB is examining the lawfulness of the processing of personal data of the data subject;
  - 10.1.5 to withdraw the consent given for the processing of personal data and forwarding offers;
  - 10.1.6 demand deletion of your personal data, e.g., if SEB has no legal basis for processing such data or, if SEB processes the data on the basis of consent and you withdraw the consent. Deletion cannot be requested when or to the extent that SEB has a right or obligation to process your personal data (e.g., for the performance of agreement or legal obligation).
- 10.2 The rights of a data subject arising from the GDPR may be restricted by other laws which SEB must comply with. For example, the Money Laundering and Terrorist Financing Prevention Act.
- 10.3 To exercise your rights, incl. to withdraw your consent, you may:
- contact a branch office of SEB;
  - submit a digitally signed application at [info@seb.ee](mailto:info@seb.ee);
  - perform the respective action (e.g., withdraw consent in electronic format or send a message to the bank) in the Internet Bank.
- 10.4 SEB will respond to your request or application as soon as possible, however no later than within one month after receipt of the request or application. If circumstances need to be clarified and checked more thoroughly to prepare a response, SEB may extend the deadline of replying.
- 10.5 SEB aims at resolving disagreements related to the processing of personal data through negotiations first. You always have a right to lodge a complaint with the Data Protection Inspectorate ([www.aki.ee](http://www.aki.ee)) if you find that processing of your personal data violates your rights and interests under applicable law. You have a right to bring an action before a court.

## 11. Data processing if you have applied for a job at SEB

In this chapter, we describe how SEB processes your personal data during and after the recruitment process, if you have applied for a job at SEB. SEB collects and processes personal data in a manner described in this chapter also when you have signed up for SEB Talent Academy. In particular, we provide an overview of from where we obtain the personal data and for what purposes SEB processes the personal data of a job applicant and what the legal bases are for processing the personal data.

- 11.1 The recruitment process is carried out by AS SEB Pank. The companies registered in Estonia and belonging to SEB Group (AS SEB Liising, AS SEB Varahaldus, SEB Life and Pension Baltic SE Estonia branch, MTÜ SEB Heategevusfond) may transmit your personal data to AS SEB Pank for conducting the recruitment process.
- 11.2 SEB mainly processes the following personal data in the recruitment process (the list is not exhaustive).
- Personal data** – name and surname, date of birth, citizenship, photo;
  - Contact data** – phone number, address, e-mail address, LinkedIn profile data;
  - Education and experience** – education, previous employers, duration of employment, reason for leaving;
  - Data of referrers** – name, phone number, e-mail address, employer, position;
  - Payment default data** – personal details, starting and ending dates of the default, amount of debt, origin of debt;
  - Your affiliation with legal persons** – beneficial owner, member of the management or supervisory board, counterparty;
  - Data on previous convictions in criminal proceedings**, data on ongoing court, enforcement and bankruptcy proceedings, data on international sanctions.
- 11.3 SEB obtains personal data at the beginning of the recruitment process:

- **from you**, e.g., when you submit to SEB your CV when applying for a job, certificates related to your job application, references, etc.; video interviews conducted during the recruitment process;
- **from a third party** whom you have asked to transmit your data to SEB, e.g., when you submit your data through a job portal or recruitment (head hunting) service provider;
- **from public online** sources and social media websites (such as LinkedIn);
- **from a third party**, who is a partner of SEB (e.g., the results of suitability tests and assessment, conducted during the recruitment process);
- **from the referrers designated by you**, if you have authorised SEB to contact them to obtain additional information regarding the job application (e.g., former employer).

11.4 SEB obtains personal data in the final round of the recruitment process:

- **from public registers** (e.g., Commercial Register, Criminal Records Database);
- **from private registers** (e.g., Creditinfo Eesti AS);
- **from the referrers designated by you**, if you have authorised SEB to contact them to obtain additional information regarding the job application;
- **from your previous and current employers**, if you have authorised SEB to contact them to obtain additional information regarding the job application.

11.5 The legal basis for data processing when organising the recruitment process and assessing qualifications is to prepare for the conclusion of an employment contract.

11.6 Contacting the referrers and participating in future recruitments (talent pool) is based on your consent.

11.7 The below table sets out the general cases for personal data processing, the list of categories of personal data and the main purposes, for which SEB processes the personal data and the legal basis for processing.

Purpose	Category of data	Legal basis	Data obtained from
<b>Organising the recruitment process</b>	Personal data Contact information	Consent; Preparing for the conclusion of employment contract	You Public online resources
<b>Considering previous applicant in future recruitments</b>	Personal data Contact information Education and experience	Consent	You Third parties
<b>Screening Only those applicants are subject to screening, who have successfully passed the previous stages of recruitment and where SEB has readiness to recruit them.</b>	Personal data Contact information Education and experience Data of referrers Payment default data Your affiliation with legal persons Data on previous punishments	Consent; Fulfilment of legal requirement when applying for specific positions	You Public registers; private registers Public online resources Your designated referrers Your previous and current employees
<b>Assessment of qualification and suitability</b>	Education and experience Data of referrers	Preparing for the conclusion of employment contract; Consent	You

11.8 Your data is classified information which can only be accessed by

- the recruiting staff of SEB;
- third parties that are legally authorised to access the data.

11.9 Your personal data, collected within the recruitment process, is retained for a maximum of one year to protect the rights of SEB in the event of possible dispute or complaint.

11.10 If an employment contract has been concluded with you, the rules of work organisation of AS SEB Pank and the companies belonging to its group apply to the processing of your personal data.