

SweepBank's Principles of Processing its Clients Personal Data (Privacy Policy)

These principles of Processing the Clients' Personal Data (hereinafter also **principles**) describe how we, SweepBank (hereinafter also **we, us or our**) process Personal Data of our Clients and any other Data Subjects (hereinafter also **you**) in relation to the services and products we offer. These principles apply if you use, have used, have expressed an intention to use or are in any other way related to our products or services, or in case you have expressed your wish to receive any information about our products or services.

1. Definitions

- 1.1. **Client** – A natural person who uses, has used or has expressed an intention to use the products or services offered by SweepBank or to conclude a guarantee or warranty agreement with SweepBank or expressed a wish to receive information about SweepBank's products or services;
- 1.2. **Contract** – A contract concluded between SweepBank and the Client;
- 1.3. **Data Protection Regulations** – Any applicable laws and regulations regulating the processing of Personal Data, including but not limited to the GDPR;
- 1.4. **Data Subject** - an identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, 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;
- 1.5. **Multitude Group** – SweepBank together with companies the majority shareholder of which is directly or indirectly SweepBank's parent undertaking Multitude Oyj (Finnish Trade Register code 1950969-1, address Ratamestarinkatu 11 A, Helsinki, Republic of Finland);
- 1.6. **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);
- 1.7. **Personal Data** – Any information relating to Data Subject. Data which is protected by banking secrecy may also include Personal Data;
- 1.8. **Processing** – Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, storing, alteration, granting access to, making enquiries, transfer, viewing, etc.;
- 1.9. **SweepBank** – Multitude Bank p.l.c., Malta Registry of Companies code C 56251 with address ST Business Centre 120, The Strand, Gzira, GZR 1027, Malta; phone +35627781088; e-mail help@sweepbank.com.

2. Data Controller

- 2.1. SweepBank is responsible for the Processing of your Personal Data and for those reasons we are the data controller under the GDPR.

2.2. As SweepBank is a company established under the laws of Republic of Malta, then the Processing of your Personal Data shall be governed by the laws of Malta and the main language governing the relationship between you and SweepBank shall be English. In the event of inconsistency or discrepancy between the English version and any of the other linguistic versions of these principles, the English language version shall prevail.

3. Collecting your Personal Data

3.1. SweepBank collects your Personal Data in the following ways:

3.1.1. In case you apply for a loan or request other services or products from us, you provide your Personal Data directly to us and additionally we collect it from Multitude Group (from your previous use of its services or products) and from external sources. Such external sources include but are not limited to public and private registers (e.g., Asiakastieto, CREFO or other similar databases) which SweepBank uses to identify you and verify your identity and perform credit and risk assessments. The Personal Data required depends on the services or products requested by you, e.g., whether you are applying for a loan, depositing money, or acting as a personal guarantor;

3.1.2. By automatic means when you use SweepBank's website. Such Processing is further explained in our Cookie Declaration available at [SweepBank's Cookies Declaration](#).

4. Personal Data Processed

4.1. Considering the financial nature of our services and products, SweepBank Processes Personal Data collected for the following purposes:

4.1.1. concluding and performing the Contract with our Client. This includes properly identifying the Client and performing credit and risk checks and assessments on the Client to determine whether and on which conditions to conclude the Contract. The legal basis for such Processing is either entering into and performing the Contract with the Client or SweepBank's legitimate interests to ensure the Client is trust- and creditworthy as well as to collect amounts due;

4.1.2. performance of our obligations arising from law (e.g., anti-money laundering (AML) and terrorist financing rules and regulations to properly identify the Client (KYC) and ensure the trust- and creditworthiness of the Client);

4.1.3. safeguarding our rights (establishing, exercising, and defending legal claims). The legal basis for such Processing is SweepBank's legitimate interest;

4.1.4. assessing and developing further the quality of our services and products, e.g., customer support service and quality assurance service. The legal basis for such processing is the legitimate interest of SweepBank;

4.1.5. assessing the quality of our (potential) service providers services which enables us to evaluate and develop further the quality of the services and products we offer to our Clients. The legal basis for such processing is the legitimate interest of SweepBank.

4.2. For the foregoing, SweepBank Processes the following Personal Data:

4.2.1. identification data (e.g., name, personal identification code, date of birth, place of birth, nationality, information about and copy of identification document, results of face/ID recognition, voice, picture, video, signature, address);

4.2.2. contact data (e.g., address, phone number, e-mail address, language of communication);

4.2.3. bank data (e.g., bank ID, account holder, account number, transaction information from your bank account, if you have consented to this);

4.2.4. professional data (e.g., current and former employer and position);

4.2.5. financial data (e.g., salary, income, assets, liabilities, properties, tax data);

4.2.6. data concerning origin of assets (e.g., data concerning employer, transaction partners, business activities and actual beneficiaries, data showing the source of your income and wealth);

4.2.7. data concerning creditworthiness/trustworthiness (e.g., data concerning payment behaviour, damages caused to SweepBank or other persons, data that enables SweepBank to perform the due diligence measures regarding money laundering and terrorist financing prevention and to ensure the compliance with international sanctions, including the purpose of the business relationship and whether the Client is a politically exposed person);

4.2.8. data obtained when performing an obligation arising from the law (e.g., information received from enquiries submitted by investigative bodies, notaries, tax authorities, courts and bailiffs);

4.2.9. communications data (e.g., e-mails, phone call recordings);

4.2.10. your personal SweepBank's account log-in data;

4.2.11. data related to the products and services of SweepBank (e.g., performance of the Contract or the failure thereof, transactions history, submitted applications, requests and complaints).

5. Processing based on consent

5.1. SweepBank also processes your Personal Data based on your consent (e.g., for direct marketing purposes, preparing and building lookalike audience groups, etc.).

5.2. When the Processing is based on your consent, you can withdraw your consent at any time by contacting SweepBank on the contact details provided below in Section 11. Please note that withdrawing your consent does not affect the lawfulness of Processing based on consent before its withdrawal.

5.3. As for direct marketing messages received by e-mail, you can also withdraw consent and unsubscribe from receiving any further e-mails by clicking on the 'unsubscribe' link at the end of each e-mail.

6. Automated decision-making and profiling

6.1. SweepBank decides based on profiling and automated decision-making whether the Client's application to receive our products or services is fully or partially accepted or rejected.

6.2. The decision is made based on information received from your application, information received from external sources and other third parties, as well as the Client's previous payment behaviour with us, Multitude Group company and other financial service providers. No special categories of Personal Data (eg. data concerning health, genetic data) are Processed.

6.3. Profiling and automated decision-making are necessary for entering the Contract, to meet SweepBank's legal obligations to properly identify the Client, for assessing the creditworthiness of the Client, fraud prevention and money laundering. Automated decision-making helps SweepBank to verify your identity and whether you are trust- and creditworthy to fulfil your obligations under the Contract. Automated decision-making helps us to make fair and responsible decisions and reduce the potential for human error, discrimination, and abuse of power, as well as enables to deliver decision-making within a shorter period, taking into account the volume of applications received by SweepBank.

6.4. Because the decision-making is automated, the Client might not be eligible for our products or services. We have implemented suitable measures to safeguard the Client's rights and freedoms and legitimate interests and can assure that we regularly test our automated methods, e.g., credit scoring methods, to ensure they remain fair, effective, and unbiased. However, if you want to contest an automated decision made or express your point of view, please contact us on the contact details provided below in Section 11.

6.5. SweepBank uses profiling in addition to above to decide based on the Client's financial soundness in using our products and services whether to offer on our own initiative a higher credit amount or other services and products to the existing Client. We have based such Processing on our legitimate interest to market our services and products. As a result of described profiling, some Clients may not receive such offers. However, such profiling does not directly produce any legal effects on the Client or otherwise significantly affect the Client, as this does not influence the already existing Contract and the Client has the chance to apply for a new loan on her/his own initiative.

7. Disclosing the Personal Data

7.1. The financial nature of SweepBank's products and services require us to share your Personal Data to run our everyday business to process transactions, maintain customer accounts, and report to public institutions. We will always ensure to respect relevant financial industry secrecy obligations before sharing any Personal Data.

7.2. We only share your Personal Data with those carefully selected and trusted partners to whom SweepBank wishes to entrust or has entrusted the provision of services and with the third parties performing functions delegated to them by law, if stipulated herein, required under the applicable law (e.g., when SweepBank is obligated to share Personal Data with the authorities) or with your consent.

7.3. SweepBank may share your Personal Data with the following partners and third parties:

7.3.1. other Multitude Group entities. The legal basis for such sharing is the legitimate interests of SweepBank to ensure the performance of the Contract or the legal obligation to ensure the services provided by SweepBank would be suitable and proportionate for the Client;

7.3.2. SweepBank cooperation partners with whom SweepBank offers co-branded products and services for providing and marketing those services and products. The legal basis for such sharing is either your consent or our legitimate interest to offer you those product and services if you are our existing Client or used recently our products or services;

7.3.3. Personal Data processors and their sub-processors, e.g., legal and other advisors, data storage providers, telemarketing, marketing and surveys service providers, communication service providers, identification and certification service providers, card management service providers, invoicing and payment service providers, credit and financial institutions, bank data scraping, scoring and credit check service providers, online and offline intermediaries, IT service providers, etc. The legal basis for such sharing is either your consent or our legitimate interests to ensure the continuity of our business and the continued provision of our products and services, including the necessary financing for offering our products and services and the return of loans granted by us;

7.3.4. credit reference agencies who provide credit reports. The legal basis for such sharing is our legitimate interests to ensure the performance of the Contract or the legal obligation to follow the principles of responsible lending;

7.3.5. persons maintaining databases of defaulted payments. The legal basis for such sharing is our legitimate interests to ensure the performance of the Contract or the legal obligation to ensure the services provided by SweepBank would be suitable and proportionate for the Client;

7.3.6. the Central Bank of Malta for the purpose of inclusion in the Central Credit Register in case you have been granted loans which exceed €5 000. The legal basis for such processing is the legal obligation to follow the Central Bank of Malta Directive No. 14;

7.3.7. debt collection agencies and bailiffs. The legal basis for such sharing is our legitimate interests to ensure the performance of the Contract;

7.3.8. SweepBank's auditors and regulators. The legal basis for such sharing is our legal obligations we are subject to;

7.3.9. other partners and third parties to which we may assign, pledge, or transfer our rights and obligations to the extent required or allowed under the legislation applicable to SweepBank or according to the agreement concluded with you. The legal basis for such sharing is either your consent or our legitimate interests of ensuring the continuity of our business.

7.4. If you submit an open banking request for which you gave your consent to, we will transfer the requested data to the payment service provider via SweepBank's API interfaces to comply with a request to access your SweepBank bank account for payment initiation services, account information services and confirmation on the availability of funds. We transfer the Personal Data to comply with our legal obligation under the Directive (EU) 2015/2366 on payment services (PSD2) to provide an interface for communication with regulated payment service providers of your choice.

7.5. When registering for or using the services of SweepBank Card through Apple Pay, through the SweepBank Platform for Mobile Contactless Payments or through Google Pay, your Personal Data shall be shared with those third

parties as independent controllers and then respectively processed according to the provisions of Annex I to these Principals.

8. Transferring Personal Data outside the EEA

8.1. SweepBank transfers Personal Data outside of the European Economic Area only where we have a lawful basis to do so, i.e., to a recipient who is: (i) in a country which provides an adequate level of protection for Personal Data; or (ii) under an instrument which covers the European Union requirements for the transfer of Personal Data outside the European Economic Area.

9. Protection of Personal Data

9.1. SweepBank endeavours to maintain physical, technical, and procedural safeguards appropriate to the sensitivity of the Personal Data in question. These safeguards are designed to protect your Personal Data from loss and unauthorized access, copying, use, modification, or disclosure. Despite these safeguards, please note that no method of transmission over the internet or data storage is fully secure. Should we be required by law to inform you of a breach to your Personal Data we may notify you electronically, in writing, or by phone.

10. Data retention

10.1. SweepBank retains your Personal Data in accordance with industry guidelines for as long as necessary for the purposes for which they were collected, or for as long as necessary to safeguard our rights, or for as long as required by applicable legal acts. Kindly note that if the same Personal Data is Processed for several purposes, we will retain the Personal Data for the longest retention period applicable. For us, the maximum period applicable is the limitation period for claims arising from transactions, which is up to 10 years from the date of your last transaction or closure of the account, whichever is the latest.

11. Your rights

11.1. To the extent required by applicable Data Protection Regulations, you have all the rights of a Data Subject as regards your Personal Data. This includes the right to:

- 11.1.1. request access to your Personal Data;
- 11.1.2. obtain a copy of your Personal Data;
- 11.1.3. rectify inaccurate or incomplete Personal Data relating to you;
- 11.1.4. erase your Personal Data;
- 11.1.5. restrict the Processing of your Personal Data;
- 11.1.6. portability of your Personal Data;
- 11.1.7. object to Processing of your Personal Data which is based on your overriding legitimate interest and which is Processed for direct marketing purposes;
- 11.1.8. should you believe that your rights have been violated, you have the right to lodge a complaint with:
 - SweepBank customer support service at help@sweepbank.com; or
 - SweepBank data protection officer at DPO@sweepbank.com; or
 - The Office of the Information and Data Protection Commissioner, Address: Floor 2, Airways House, Triq II - Kbira, Tas-Sliema SLM 1549, Phone: 2328 7100; or
 - Data Protection Supervisory Authority of your country; or

- the courts of your country should you believe that your rights have been violated.

11.2. When requesting access to, or rectification or deletion of your Personal Data, please note that we shall request specific information from you to enable us to confirm your identity and right to access, rectify or delete, as well as to search for and provide you with the Personal Data that we hold about you.

11.3. Kindly note that your right to access, rectify, or delete your Personal Data we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse your request. In addition, the Personal data may have already been destroyed, erased, or made anonymous in accordance with our record retention obligations and practices as described above in Section 10.

11.4. If we cannot provide you with access to, or rectification or deletion of your Personal Data, we will inform you of the reasons why, subject to any legal or regulatory restrictions. We can assure you we will not discriminate you for exercising any of your rights described in these Principles.

11.5. To exercise your rights, please contact SweepBank on the contact details above. Please note that you can exercise some rights by logging into your SweepBank personal user account.

12. Amending these principles

12.1. Should our Personal Data Processing practices change or there shall be a need to amend these principles under the applicable law, case-law or guidelines issued by competent authorities, we are entitled to unilaterally amend these principles at any time. Our most recent principles will always be published on our website and we urge you to check this at least once a month.

13. Contact

13.1. In case you have any question regarding the Processing of your Personal Data by SweepBank or you would like to exercise your rights as a Data Subject, please contact us on contact details provided above in Section 11.

13.2. SweepBank has appointed a data protection officer whom you also may contact regarding the same on the contact details provided above in Section 11.

Annex I to SweepBank's Principles of Processing the Personal Data - Personal Data Processing for Apple Pay, for SweepBank's Platform for Mobile Contactless Payments and for Google Pay

1. Application

1.1. This Annex I explains how your Personal Data is processed when you as a SweepBank Client register for or use SweepBank Card through Apple Pay or through the SweepBank's Platform for Mobile Contactless Payments or through Google Pay (hereinafter altogether named as Platforms) according to the applicable provisions of SweepBank's General Terms and Conditions.

1.2. This Annex I complement the SweepBank's principles of Processing the Personal Data as stated above, SweepBank's General Terms and Conditions and in addition should be read by the Client along with the terms and conditions and the privacy policy of:

- a) Apple Pay available on <https://support.apple.com/en-us/HT203027>; and

b) Google Pay available on https://payments.google.com/payments/apis-secure/get_legal_document?ldo=0&ldt=privacynotice&ldl=en-GB.

2. Personal Data subject to Processing

2.1. When you register for and use the Platforms as described in Clause 1.1. of this Annex I, SweepBank shall collect and process your following Personal Data:

- a) your name, surname and phone number;
- b) the details of your transactions made through Platforms;
- c) the contact and shipping details for those payment transactions made at participating merchants;
- d) the details of your SweepBank Card and any other card registered for use through Platforms;
- e) location data in case you switch on any location service in your device.

3. Purposes of Processing

3.1. Your Personal Data will be processed for the following purposes:

- to verify your SweepBank Card or any other card to be registered for use through Platforms;
- to facilitate the use of SweepBank Card or of any other card registered for use through Platforms;
- to deal with queries from Apple Pay and Google Pay;
- to authorise payments through Platforms on the dedicated section of SweepBank Mobile App;
- to prevent and detect fraud;
- to comply with legal requirements and industry standards; and
- to help us develop, maintain, and improve our products and services.

4. Retrieval of Data

4.1. You shall be able to retrieve on your Mobile Account information concerning each card registered for use through Platforms on the dedicated section of the SweepBank Mobile App, including, but not limited to, your ten (10) most recent transactions, the merchant's name and location, each transaction amount and part of the number identifying your SweepBank Current Account. You can choose not to have such information displayed, by suspending the use of SweepBank Card of any other card registered for use through Platforms.

5. Sharing your Personal Data with third parties

5.1. Kindly note that Apple Pay and Google Pay are separate data controllers under GDPR while Processing your Personal Data to provide you with their services. Therefore, SweepBank is not responsible for the data processing activities of Apple Pay and Google Pay, including any of the services and/or products provided by their partners. Any Personal Data (including the details of your SweepBank Card or of any other card registered for use through Apple Pay and/or Google Pay) given to such separate data controller shall be subject on an exclusive basis to their own terms and conditions and privacy policies. For more information, please refer to Clause 1.2 of this Annex I.

5.2. In addition, please note that any of your Personal Data (including the details of your SweepBank Card or of any other card registered for use through Platforms) that is collected by your device provider while you use your SweepBank Card or other cards through Platforms, shall be subject on an exclusive basis to the terms and conditions and privacy policies of your device provider and, to the applicable extent, of any other involved third-party.

5.3. For SweepBank to be able to provide the services to you under Schedule B.1., Schedule B.2. and/or Schedule B.3., your Personal Data shall be shared with:

- MeaWallet A.S. (a corporation, with offices located at Drengsrudbekken 12, N-1371 Asker, Norway), in order to ensure the operativity of the dedicated section of the SweepBank Mobile App for payment transactions. This applies only when the registration process and/or the card payment orders is/are made on such dedicated section, as the software running it is provided to SweepBank by MeaWallet A.S;
- MasterCard Europe SA (a Belgian limited liability company, with Belgian enterprise number RPR 0448038446, having its registered office at 198/A, Chaussée de Tervuren, 1410 Waterloo, Belgium), in order to process the relevant transactions the details of your SweepBank Card or of any other card registered on the dedicated section of SweepBank Mobile App shall be shared with MasterCard. Mastercard has established a comprehensive privacy and data protection program to ensure compliance with applicable data protection laws and have embedded privacy and data protection into the design of their products and services. For more information, please refer to the Binding Corporate Rules of Mastercard available on <https://www.mastercard.us/content/dam/mccom/global/documents/mastercard-bcrs.pdf>.