



Fotografi: Brian Buchardt

## Privacy Policy and Cookies – Nykredit Bank

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## **PROCESSING OF PERSONAL DATA**

In the following, you will find information about the personal data Nykredit Bank A/S ("Nykredit Bank") collects about you, why we need to collect your personal data, and how we store the data. You will also find information about your rights in respect of our processing of your personal data.

### **1. COLLECTION AND PURPOSE**

Nykredit Bank collects personal data on our customers<sup>1</sup> and persons related to our customers, such as staff and guarantors. We use personal data in connection with financial service offerings of all kinds and any related advisory, customer care, administration and credit workout services. We also use personal data for statistical and marketing purposes, prevention of misuse and loss and when filing statutory reports. Moreover, we use personal data for profiling and data modelling to be able to offer you services and products that meet your preferences and for optimising Nykredit's internal processes.

#### **1.1 DATA RECEIVED FROM YOU**

We need specific data on you when you become a customer with Nykredit Bank and while you are a customer. If you wish to borrow money, we need your civil registration (CPR) no and information about your financial position, including your tax assessment notices from the Danish tax authorities (SKAT), financial statements and budgets.

We use your CPR no when filing statutory reports with the tax authorities. If you have an address abroad, we also need information about your home country and foreign tax identification number.

Under the Danish Act on Measures to Prevent Money Laundering and Financing of Terrorism (the "Anti-Money Laundering Act"), you are obliged to verify your name and CPR no using your passport or driver's licence and other official document, such as your national health insurance card. Nykredit Bank is also required to know the purposes and intended nature of your customer relationship with us. Anyone with access to your accounts, including joint account holders/agents, must supply the same details as well as proof of identity.

We must obtain information about the source of your funds and any unusual transactions and patterns of transactions. If you are a business customer, we are required to obtain information about the legal structure, controlling owners, management and beneficial owners of the business as well as the provisions regulating the power to bind the business.

If Nykredit Bank knows, suspects or has reasonable grounds for assuming that transactions, funds or activities are or have been related to money laundering or terrorist financing, Nykredit Bank is under an obligation to report this to the authorities.

Nykredit Bank is obliged to store data collected in accordance with the Anti-Money Laundering Act, including copies of the proofs of identity. Nykredit Bank must also store other data, documents and recordings collected or made to comply with the rules of the Anti-Money Laundering Act.

Data collected with the sole purpose of complying with the rules of the Anti-Money Laundering Act are only used for the prevention of money laundering and terrorist financing.

Nykredit Bank sometimes records our telephone and video conversations with you together with other electronic communication as proof of what we have agreed and proof that we have offered you proper advice on foreign exchange trading, for example. We record and keep records of all telephone conversations and electronic communication which will or may result in a securities transaction.

Whenever you use a debit or a credit card, we register the card number, the transaction amount and the time and place of use.

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<sup>1</sup> We collect data on you when you become a customer and while you are a customer.

## **1.2 DATA RECEIVED FROM OTHERS – ABOUT YOU**

In addition to the data Nykredit Bank receives from you, we obtain property and personal data from public property and civil registers, including the Danish Civil Registration System and other sources and registers available to the public.

We also receive data on you from companies in the Nykredit Group and other business partners (including banks and other correspondents<sup>2</sup>) subject to your prior consent or if we are required to do so by law.

In connection with payment handling, such as the execution of payment orders, Nykredit Bank collects data from points of sale, banks and others for the purpose of completing payments and preparing bank statements, pre-notification statements etc.

When you wish to borrow money, we will search for any data recorded about you by credit rating agencies and credit default registers, including international data providers and other publicly available resources, and, subject to your prior consent, by Group companies and business partners.

We receive data from Nykredit Group companies when they file reports with the Money Laundering Secretariat under the State Prosecutor for Serious Economic and International Crime in accordance with the Anti-Money Laundering Act.

## **1.3 STORAGE**

We store your personal data as long as they are required for the purposes for which they were collected, processed and stored.

Nykredit Bank must comply with the storage requirements set out in financial legislation, including the Act on Payments, the Anti-Money Laundering Act, the Capital Markets Act, the Credit Agreement Act, the Capital Requirements Regulation and other relevant legislation, such as the Tax Control Act and the Bookkeeping Act. Consequently, we may be obliged to store your personal data for a certain period of time, even though you are no longer a customer of ours. For example, the Anti-Money Laundering Act requires that we store your personal data for five years after termination of our customer relationship if the data were obtained for the purpose of complying with the anti-money laundering rules.

## **2. DISCLOSURE AND TRANSFER**

Data are only disclosed to other commercial banks, mortgage banks, payees, APIs and other financial infrastructure businesses such as Nets if required for the purpose of fulfilling our agreement with you. Examples include case processing and payment handling. If, for example, you have asked us to transfer an amount to someone, we will only disclose the data needed to identify you and complete the transfer.

Subject to your consent or if possible under applicable legislation, we also disclose personal data internally within the Nykredit Group and to Nykredit Bank's external business partners, including banks and other correspondents.

Nykredit Bank only discloses your personal data to public authorities if we are required to do so by law. This is relevant with respect to the Danish Financial Supervisory Authority in accordance with the Danish Financial Business Act, the State Prosecutor for Serious Economic and International Crime in accordance with the Anti-Money Laundering Act, the Danish tax authority (SKAT) in accordance with the Tax Control Act, Danmarks Nationalbank for statistical and other purposes and the courts of law in connection with lawsuits. We make international transfers of money via SWIFT, which is a collaboration between financial institutions worldwide. Under US legislation, SWIFT is obliged to disclose data to the US authorities on international money transfers in the event of suspicion of money laundering or financing of criminal or terrorist activities.

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<sup>2</sup> A foreign financial business working together with a Danish financial business on international credit mediation and payment handling.

In case of default, Nykredit Bank may disclose your personal data to credit rating agencies, debt collection agencies and credit default registers, including Experian A/S (formerly RKI Kredit Information A/S).

We will transfer personal data to processors in the context of IT development, hosting and support, including processors in countries outside the EU and the EEA, for instance India, the US, Brazil, Japan and Costa Rica. You can find a complete list of third countries to which we transfer personal data at [nykredit.dk/personoplysninger](https://nykredit.dk/personoplysninger). We use standard contracts approved by the European Commission or the Danish Data Protection Agency. This is to ensure that your rights and the level of protection follow your personal data. The standard contracts we use are available at [nykredit.dk/personoplysninger](https://nykredit.dk/personoplysninger).

### **3. YOUR RIGHTS**

#### **3.1 RIGHT OF ACCESS**

You are entitled to get access to the personal data we process about you and to obtain information about their origin, how long we store them and what we use them for. You can also obtain information about who receives your personal data and which personal data we are entitled – subject to your consent – to disclose when and to whom. Your right of access may, however, be restricted by legislation and by our need to protect the privacy of other persons or Nykredit Bank's business concept or practice. Also, Nykredit Bank's know-how, trade secrets as well as internal assessments and material may be exempt from your right of access.

#### **3.2 AUTOMATED DECISION-MAKING, INCLUDING PROFILING**

If you have been registered as a debtor with a credit rating agency, any loan applications filed by you via the mobile app Lunar Way will be rejected by default. Your application may, upon your request, be reassessed by a Nykredit staff member to ensure that the default rejection will not affect you negatively.

#### **3.3 DATA PORTABILITY**

If Nykredit Bank processes personal data on the basis of your consent or further to agreement, and where such processing is automated, you are entitled to receive the data you have given us in electronic format.

#### **3.4 INACCURATE/MISLEADING INFORMATION**

If you inform Nykredit Bank that your data are inaccurate or misleading, we will correct them.

#### **3.5 ERASURE OF DATA**

In special circumstances, you have a right to request erasure of your personal data. You may do so if, for example, data are no longer required for the purposes for which they were collected, processed and stored.

#### **3.6 RIGHT OF OBJECTION**

In certain cases, you are entitled to object to our otherwise lawful processing of your personal data. You are at all times entitled to object to our use of your data for direct marketing.

#### **3.7 RESTRICTED PROCESSING**

In certain cases, you may demand that we restrict the use of your data to storage. If, for example, you are entitled to have your personal data erased, you may instead request that we restrict the use of your personal data to storage. Please note that such a restriction will not

prevent Nykredit Bank from using your personal data if necessary for the purpose of asserting a legal claim or if you have given your consent to such use.

### **3.8 WITHDRAWAL OF CONSENT**

You can at any time stop the disclosure of personal data that are subject to your consent by withdrawing the consent you have given us. If you withdraw your consent, we may not know the full extent of your business with the Nykredit Group and may therefore not be able to offer you optimum advisory services or the best terms.

## **4. SPECIFICALLY ON COOKIES**

When you visit Nykredit online, you will encounter cookies.

### **4.1 WHAT IS A COOKIE?**

A cookie is a text file placed on your computer or another IT device. This will allow recognition of your computer or logging of data on which Nykredit websites and features you visit with your browser – but not on who you are, what your name is, where you live or whether the computer is being used by one or more persons. A cookie cannot spread computer viruses or other malware.

### **4.2 WHAT DO WE USE COOKIES FOR?**

Cookies are used on almost all websites, and some websites will not work without cookies.

On Nykredit's websites, we use cookies for the following purposes:

- Improvement of technical functionality and performance. This means that we use cookies to optimise the way we deliver the website to you.
- Measuring traffic
- Advertising management, so that we can control how often the same advertisement is shown to the same user and register how many people click the advertisement
- Behaviour-based individual targeting of advertisements, so that you only see the advertisements we believe to be of most relevance to you

Nykredit uses Adtech, Dansk Udgivernetværk, nugg.ad, OpenAdExchange and other networks in connection with advertising. You can find a list of advertising networks here: [nykredit.dk/personoplysninger](http://nykredit.dk/personoplysninger).

The data we obtain about you via cookies include:

- Which webpage you visited before you visited Nykredit
- Which Nykredit webpages you have browsed and when
- Which browser you are using
- Your IP address
- Your operating system (eg Windows XP).

### **4.3 ACCEPTANCE, REJECTION AND DELETION OF COOKIES**

The first time you visit a Nykredit website, you are informed that we use cookies. You accept the use of cookies by clicking "Jeg accepterer cookies" (I accept cookies). If you do want us to use only functionality-dependent cookies, click "Indstillinger" (Options). Here you can view and adjust the cookies you receive. You cannot disable the cookies required for proper functionality of the site. The list of relevant cookies is available at [Nykredit.dk](http://Nykredit.dk).

We do, however, save a cookie to remember your choice.

You can withdraw your acceptance at any time or avoid cookies entirely by disabling them in your browser. Please note that if you withdraw your acceptance, your access to [nykredit.dk](http://nykredit.dk) and [mitnykredit.dk](http://mitnykredit.dk) will be limited.

You can always reject cookies on your computer by changing your browser settings. The location of your settings depends on the browser you use. However, please note that if you reject cookies, you will be unable to use many functionalities and services as they work only if the website can remember your clicks.

All browsers permit you to delete cookies individually or en bloc; however, the method used depends on your browser. If you are using several browsers, you must delete cookies in them all. Most browsers allow you to delete your cookies by using the shortcut keys: CTRL+SHIFT+Delete.

Guides on how to delete cookies in:

- Internet Explorer
- Chrome
- Firefox
- Safari
- Flash cookies (all browsers)
- iPhone, iPad and other Apple devices
- Smartphones with Android operating system
- Smartphones with Windows 7

are available at: [nykredit.dk/personoplysninger](http://nykredit.dk/personoplysninger)

#### **4.4 FACEBOOK, TWITTER AND LINKEDIN (THIRD-PARTY COOKIES)**

On some of our websites, you can link to/use the Like button for Facebook, Twitter and LinkedIn. Please note that if you do so, Facebook, Twitter and LinkedIn will receive technical data on your browser, IP address and the websites you visit. When you use these services/websites, their cookie rules apply.

For further information about cookies and the legal basis for using them, see the Executive Order on Information and Consent Required in Case of Storing or Accessing Information in End-User Terminal Equipment at the website of the Danish Business Authority ([erhvervsstyrelsen.dk](http://erhvervsstyrelsen.dk)).

### **5. CONTACT NYKREDIT**

If you have any questions about the way we process your data or wish to withdraw your consent or exercise your rights, do not hesitate to contact:

Nykredit Bank A/S  
Kalvebod Brygge 1-3  
DK-1780 Copenhagen V  
CVR no 10 51 96 08  
Tel +45 70 10 90 00  
[kundeservice@nykredit.dk](mailto:kundeservice@nykredit.dk)

or contact our Data Protection Officer:

Nykredit Bank's Data Protection Officer  
Kalvebod Brygge 1-3  
DK-1780 Copenhagen V  
[databeskyttelsesraadgiver@nykredit.dk](mailto:databeskyttelsesraadgiver@nykredit.dk)

### **6. HOW TO FILE A COMPLAINT**

If you are dissatisfied with the way we process your personal data, you can file a complaint with:

Nykredit Bank A/S  
Klageservice  
Kalvebod Brygge 1-3  
DK-1780 Copenhagen V  
klageansvarlig@nykredit.dk

or:

The Danish Data Protection Agency  
Borgergade 28, 5.  
DK-1300 Copenhagen K  
dt@datatilsynet.dk

## **7. CHANGES**

This policy will take effect as from 15 April 2019 and replaces any information on the processing of personal data that you received previously.

We will inform you via Nykredit's online banking service, e-Boks or ordinary post if we make any significant changes to this policy.