

Privacy Notice

Your Privacy Matters at TF Bank

At TF Bank, protecting your privacy is a fundamental part of our business. Whether you're a customer, a partner, or someone who has interacted with us, we want you to feel confident about how we handle your personal data.

This privacy notice is designed to give you clear and transparent information about how we collect, use, and safeguard your personal data. It also outlines your rights and how you can exercise them. All data processing is carried out in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and other applicable data protection laws.

TF Bank provides financial services and payment solutions in Sweden and internationally, including in Norway, Finland, Denmark, Germany, Austria, Spain, Italy, Poland, Lithuania, Latvia, Estonia, the Netherlands and Ireland. These services are delivered through companies within the TF Bank Group, as well as through branches and cross-border operations.

This notice applies to all personal data processing within TF Bank, whether you:

- are a customer,
- have applied for one of our products or services,
- are a supplier or business partner,
- or have been in contact with us without establishing a customer relationship.

We are committed to handling your information with the highest level of care and respect. If you have any questions or concerns about how we process your personal data, please don't hesitate to contact us. You'll find our contact details in Section 12 of this notice.

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1 Definitions

The following definitions apply throughout this privacy notice:

TF Bank	Secondary trade name of Avarda Bank AB (publ), corporate registration number 556158-104.
Avarda Group	Subsidiaries and branches fully owned by Avarda Bank AB (publ). For a complete and official list of subsidiaries and branches fully owned by Avarda Bank AB (publ), please visit our 2024 Annual and Sustainability Report .
AML/CTF	Anti-Money Laundering (AML) refers to the laws, regulations, and procedures designed to prevent criminals from disguising illegally obtained funds as legitimate income. Counter-Terrorism Financing (CTF) involves measures to detect and prevent the use of financial systems to fund terrorist activities.
DPO	Data Protection Officer
Customer	An individual that has entered into, or has expressed the intention to enter into, a contractual relationship with TF Bank.
Merchant	An online retailer or business that uses TF Bank's checkout solution to offer and process purchases through its e-commerce platform.

2 Data controller

TF Bank is the data controller for the processing of your personal data in accordance with the General Data Protection Regulation (GDPR). TF Bank has its primary place of business in Sweden, which is why TF Bank considers that TF Bank's responsible supervisory authority is the Swedish Data Protection Authority (IMY).

You will find contact information for TF Bank and IMY in Section 12.

3 Categories of personal data

In this section, we describe the categories of personal data that TF Bank processes about its Customers.

TF Bank also processes personal data about data subjects who have applied for TF Bank's products or services but for various reasons have not entered into a customer relationship with TF Bank.

Categories and examples of datapoints	
<p>Contact and identification Data</p> <ul style="list-style-type: none"> • Full name • Phone number • Email address • National ID number • Date of birth • Passport number • ID document photocopy • E-signature 	<p>This category includes personal identifiers and contact details used to verify identity and maintain communication. It covers for example names, contact information, official ID numbers, biometric data (like e-signatures and video identification), and residency or tax-related documents.</p>

<ul style="list-style-type: none"> • Social security number • Title • Residency certificate • Customer number • Tax ID • Video identification data • Power of attorney documents 	
<p>Compliance screening data</p> <ul style="list-style-type: none"> • Information from external sanctions lists • Politically Exposed Person (PEP) status • FATCA information • Conflict of interest information 	<p>Covers information related to legal compliance and risk assessment, such as sanctions list checks, politically exposed person (PEP) status, FATCA compliance, and potential conflicts of interest.</p>
<p>Payment data</p> <ul style="list-style-type: none"> • Transaction data • reitingas • Invoices • Purpose of transactions • Payment history • Interest and fees • Account number • Virtual IBAN 	<p>Payment data refers to a category of financial information that includes details necessary for processing and analyzing monetary transactions.</p>
<p>Credit assessment data</p> <ul style="list-style-type: none"> • TF Bank products and services usage • Credit score • Credit capacity and limit • Income information • Payment history 	<p>Credit assessment data refers to information used to evaluate an individual's financial reliability and borrowing capacity.</p>
<p>Socio-demographic data</p> <ul style="list-style-type: none"> • Nationality • Marital status • Number of children • Gender • Occupation • Employment status 	<p>Includes personal background information such as nationality, family status, gender, and employment details, which may be used for profiling or service personalization.</p>
<p>Online behavior and device information</p> <ul style="list-style-type: none"> • IP address • Mobile or computer device ID • Language preference • Browser settings • Time zone • Operating system • Screen resolution • TF Bank website and app usage 	<p>Captures technical and behavioral data from digital interactions, including device identifiers, browser and system settings, and usage patterns on the TF Bank's website and app.</p>
<p>Communication data</p> <ul style="list-style-type: none"> • Email correspondence • SMS messages • Call and video recordings • Chat transcripts • Paper letters 	<p>Refers to all forms of communication between the individual and TF Bank, including emails, messages, calls, chats, and physical correspondence.</p>

Legal case records <ul style="list-style-type: none">• Court rulings and decisions• Complaints• Written statements• Summons documents• Debt enforcement documents	Includes documentation and records related to legal matters, such as court decisions, complaints, and enforcement actions.
Information about goods and services <ul style="list-style-type: none">• Merchant details• Purchased goods or services• Delivery information• Tracking number	Details the nature of purchases made through TF Bank's services, including Merchant information, product or service descriptions, and delivery tracking data.

4 What personal data is used for which purposes and on what legal basis?

4.1 Ecommerce Solutions

TF Bank is operating its Ecommerce Solutions segment under the brand Avarda. In this section the brand name Avarda is used when referring to TF Bank.

This section of the notice explains the purposes for which we process your personal data, the sources from which the data is collected, and the legal basis for processing when you use Avarda’s checkout and choose a credit option to pay for goods or services at Merchants partnered with Avarda.

	Processing activity and purpose	Categories of personal data	Legal basis
1.1	<p>Customer relationship management. In accordance with the contract between you and Avarda, we process your personal data to administer and fulfill our contractual relationship with you. This includes, for example, creating and administering your customer account, providing customer service, sending contract-related information and communicating about your services. The processing is necessary for us to fulfill our obligations under the contract entered into with you.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Agreement and explicit consent (Article 6.1(b) and Article 9.2(a) GDPR) We process your personal data because it is necessary to perform our agreement with you – for example, to deliver a requested service or product.</p> <p>If the service processes data that constitutes sensitive personal data (for example, from material you choose to upload), our processing is based on your explicit consent.</p>

1.2	<p>Payment processing</p> <p>We process your personal data in order to handle and execute payments connected to your use of our services. This includes, for example, registering and verifying payment details, processing transactions, managing refunds and chargebacks. The processing is necessary for us to fulfill our obligations under the contract entered into with you.</p>	<p>From other sources</p> <ul style="list-style-type: none"> • Payment data 	<p>Agreement (Article. 6.1(b) GDPR)</p> <p>We process your personal data for payment purposes because it is necessary to perform our agreement with you – for example, to register and verify your payment details, process transactions, and manage refunds or chargebacks. The processing is therefore based on the necessity to fulfil our contractual obligations.</p>
1.3	<p>Credit assessment prior to and during a contractual customer relationship</p> <p>We process your personal data to carry out necessary credit assessments, either as part of assessing your application for our financial services or to follow up on an ongoing contractual relationship. This includes, for example and to the extent authorized by law, obtaining and analyzing information about your payment capacity, creditworthiness and financial situation to make informed decisions about granting credit or other financial products. This processing constitutes profiling and automated decision-making.</p> <p>For more information on profiling and automated decision-making, please see Section 7.</p> <p>For more information about the credit bureaus we use, please see Section 6.6.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Socio-demographic data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services. 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR) and Legitimate interest (Article 6.1 (f))</p> <p>The processing of your personal data is necessary to fulfil our legal obligations to carry out credit assessments when examining credit applications and to continuously monitor and manage credit risks during an ongoing customer relationship. These obligations follow from the Consumer Credit Act and other applicable financial market regulations and constitute a fundamental part of a responsible credit granting procedure. The processing is therefore a prerequisite for us to be able to conduct our credit operations in a safe and legal manner, and to safeguard both our own and our customers' financial stability.</p>

1.4	<p>Identification</p> <p>We process your personal data to identify you and verify your identity. This is necessary to ensure that it is indeed you who is using our services and to prevent unauthorized access, fraud or other improper use. By validating your identity, we contribute to a safer customer experience and strengthen the protection of both you and our business.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification Data • Compliance screening data • Financial data • Socio-demographical data • On-line behavior and device information • Communication data 	<p>Legal basis: Agreement and explicit consent (Article 6.1(b) and Article 9.2(a) GDPR)</p> <p>The processing of your personal data is necessary for us to fulfil our contractual obligations towards you, for example to provide the financial services you have requested or contracted for. In cases where we process sensitive personal data, this is only done with your consent, which we obtain and inform you of when the data is collected.</p>
1.5	<p>Risk assessment, fraud prevention and operational and financial risk management</p> <p>For the purpose of verifying identity, ensuring the accuracy of data provided and detecting and preventing potential irregularities or criminal activity. The processing may include profiling and automated decision-making to assess the likelihood of fraud risks. Further information on such processing can be found in Section 7.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR)</p> <p>We process your personal data based on our legal obligation to identify, prevent and manage fraud and operational and financial risks. These obligations follow from applicable financial market regulation and are a fundamental prerequisite for a safe and stable financial system. The processing is therefore necessary for us to be able to conduct our business in a responsible manner and to protect both our customers and our organization. If you have any questions about this processing, please contact us. See contact details in Section 12.</p>
1.6	<p>To prevent money laundering and terrorist financing (AML/CTF)</p> <p>We process personal data for the purpose of complying with our legal obligations under the AML/CTF framework. This includes verifying your identity, assessing customer risk, and detecting and preventing suspicious or improper activity.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR)</p> <p>The processing of your personal data is necessary to comply with our legal obligations to identify, prevent and combat money laundering and terrorist financing. These obligations follow from the Act on Measures Against Money Laundering and Terrorist Financing and other applicable</p>

	The processing may include profiling and automated decision-making to assess the risk of you being involved in activities that violate money laundering laws. For more information on profiling and automated decision-making, please see Section 7.	<ul style="list-style-type: none"> • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	regulations within financial market law and constitute a central part of a safe and transparent financial system. The processing is therefore a prerequisite for us to be able to conduct our business in a responsible and lawful manner, and to protect the safety of both our customers and society.
1.7	<p>To conduct customer surveys and collect your feedback</p> <p>Personal data is processed to enable the sending of surveys, invitations to customer interviews and requests for reviews via email, text message, telephone or other relevant communication channels. The purpose is to collect feedback that contributes to the improvement of services and customer experience.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Information about goods and services • Socio-demographic data 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>We process your personal data based on our legitimate interest in conducting customer satisfaction surveys and consumer analysis. After weighing up our interests, we have concluded that this processing is necessary to improve our products and services, and that our interest outweighs the potential intrusion into your personal privacy that the processing may entail. If you would like more information about this assessment or wish to object to the processing, please contact us. See contact details in Section 12.</p>
1.8	<p>Maintaining network and information security</p> <p>We process your personal data to ensure the security of our IT systems and services. This includes monitoring network traffic, detecting and preventing unauthorized access, malware, phishing, and other security threats. We apply technical and organizational measures such as encryption, access control, and system logging to protect the confidentiality, integrity, and availability of information.</p> <p>Your data may also be used in security audits, incident management, and compliance with legal and regulatory requirements, including those related to financial supervision and cybersecurity standards and regulations. The</p>	<p>From you:</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources:</p> <ul style="list-style-type: none"> • Contact and identification data • Payment data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR) and Legal obligation (Article 6.1 (c))</p> <p>Avarda processes your data to help maintain strong network and information security. This is essential for protecting our systems and ensuring that your personal information remains safe. We've carefully considered the impact of this processing and believe it's necessary to safeguard both our services and your experience as a customer. If you would like more information about this assessment or wish to object to the processing, please contact us. See contact details in Section 12.</p>

	purpose is to protect both our Customers, Merchants and Avarda from data breaches, disruptions, and other security risks.		
1.9	<p>Anonymization for service development and analysis</p> <p>We process your personal data by anonymizing it in order to be able to develop and improve our services and products, as well as to analyze customer behavior at an aggregate level. Anonymization ensures that the data can no longer be linked to you as an individual, which means that the information no longer constitutes personal data under data protection legislation.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>This processing is based on our legitimate interest in anonymizing personal data to enable product development and analysis of customer behavior. After weighing up our interests, we have assessed that the processing is necessary to achieve this purpose, and that our interest in developing and improving our services outweighs the intrusion into the privacy of the data subject that the processing may entail. By anonymizing the data, we also ensure that the use of personal data is limited to a minimum.</p> <p>If you would like to know more about how this assessment was made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
1.10	<p>Analytics to improve marketing and marketing channels</p> <p>We process your personal data to conduct customer segmentation and analysis to better understand different customer groups and their needs. This enables us to adapt our products, services, and communication to specific segments, ensuring that our offerings are relevant and aligned with customer preferences. The processing helps us identify patterns in customer behavior and improve our overall service experience. This processing may involve profiling and automated decision-making. For more information on profiling and automated decision-making, please see Section 7</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>This processing is based on our legitimate interest in analyzing the results of our marketing and improving content, channels and customer communication. After weighing up our interests, we have assessed that the processing is necessary to achieve this purpose, and that our interest in streamlining and adapting our marketing outweighs the intrusion into the privacy of the data subject that the processing may entail. The analysis also contributes to a more relevant experience for you as a customer.</p> <p>If you would like to know more about how this assessment has been made or if you wish to</p>

			object to the processing, you are welcome to contact us. See contact details in Section 12.
1.11	<p>Marketing and customer surveys</p> <p>We process your personal data to provide and customize marketing, offers and customer surveys related to our products and services. This applies to both services you already use and similar offers within our consumer offering. The aim is to make the information more relevant to you, based on your interests and previous interactions.</p> <p>If you do not want to receive marketing from us, you can let us know at any time. We will then stop processing your personal data for this purpose. Contact details can be found in Section 12.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Online behavior and device information 	<p>Legal basis: Legitimate interest and consent (Article 6.1(f) and Article 6.1(a) GDPR)</p> <p>The processing of your personal data for the purpose of providing marketing and customer surveys is based on our legitimate interest in communicating with you in a relevant, effective and personalized manner. After weighing up our interests, we have assessed that this processing is necessary to achieve this purpose, and that our interest in improving the customer experience through personalized marketing outweighs the intrusion on the privacy of the data subject that the processing may entail.</p> <p>If you would like to know more about how this assessment has been made, or if you would like to object to the processing, you are welcome to contact us. See contact details in Section 12. Depending on the channel we use, we might base our processing on your consent.</p> <p>You can withdraw your consent at any time. This does not affect the lawfulness of processing already carried out on the basis of consent.</p>
1.12	<p>Analytics to develop services</p> <p>We process your personal data, including recording calls, to conduct analytics to develop and test our services and improve our risk management, fraud prevention and credit assessment models. This processing gives us better insight into how our services work in practice, which allows us to identify areas for improvement, ensure a safe user experience and make more informed business decisions.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>This processing is based on our legitimate interest in analyzing data for the purpose of developing, improving and validating our risk management, fraud prevention and credit assessment models. After weighing up our interests, we have assessed that the processing is necessary to achieve this purpose, and that our interest in ensuring accurate and reliable models outweighs the intrusion into the privacy of the data subject that the processing may entail. The work also contributes to increased</p>

		<ul style="list-style-type: none"> • Communication data • Legal case records • Information about goods and services 	<p>financial stability and a fairer treatment of our customers.</p> <p>If you would like to know more about how this assessment has been made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
1.13	<p>Debt management and collection of overdue debts</p> <p>We process your personal data for the purpose of administering and collecting overdue debts, which may include reminders, collection requests, terminations and assignment of the claim to a third party. The processing is necessary to ensure the legal and efficient management of unpaid debts and to fulfill our contractual and commercial obligations. The purpose is to maintain credit discipline and safeguard the financial stability of our business.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>The processing of your personal data for the purpose of administering and collecting overdue debts is based on our legitimate interest in ensuring that outstanding receivables are handled efficiently and legally. After weighing up our interests, we have assessed that this processing is necessary to maintain payment discipline, safeguard our financial stability and fulfil our contractual rights. Our interest outweighs the infringement of the data subject's privacy that the processing may entail, especially since the measures are a natural part of the financial contractual relationship.</p> <p>If you would like to know more about how this assessment has been made, or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
1.14	<p>Protection of legal interests and management of legal claims</p> <p>We process your personal data to protect our legal interests, manage potential or actual litigation, and exercise, establish or defend legal claims. The processing enables us to act in disputes, comply with legal obligations, and responsibly manage risks that may affect our business or the rights of our customers.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>The processing of personal data for the purposes of protecting our legal interests and dealing with potential or actual disputes is based on our legitimate interest in being able to establish, exercise or defend legal claims. After weighing up our interests, we have assessed that the processing is necessary for this purpose and that our interest outweighs the intrusion on the privacy of the data subject that the processing may entail.</p>

		<ul style="list-style-type: none"> • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>In connection with a dispute, we may also need to collect additional personal data concerning you, in addition to those already specified in Section 3. If necessary for handling legal proceedings, sensitive personal data may also be processed, in accordance with Article 9.2(f) GDPR.</p> <p>If you would like to know more about how this assessment has been made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
1.15	<p>Handling of data subject rights under data protection law</p> <p>We process your personal data in order to exercise and manage the rights you have as a data subject under data protection law, such as the right to access your data, have inaccurate data corrected, object to processing or request erasure. This processing enables us to respond to your requests in an accurate, secure and efficient manner, and to comply with our obligations under applicable data protection law.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR)</p> <p>The processing of your personal data to manage your rights as a data subject – such as the right of access, rectification, erasure, data portability, objection and restriction – is based on our legal obligation under the General Data Protection Regulation (GDPR). These obligations follow directly from applicable law and require us to be able to respond to and handle your requests in an accurate and documented manner.</p> <p>The processing is therefore necessary for us to be able to fulfill our obligations as a data controller and is a central part of ensuring your rights and our compliance with data protection law.</p> <p>If you have any questions about how we manage your rights, you are welcome to contact us. See contact details in Section 12.</p>
1.16	<p>Accounting and statutory accounting</p> <p>We process your personal data in order to fulfil our obligations under accounting legislation, including to prepare, document and maintain accounting records in accordance with applicable regulations. The processing is necessary to ensure accurate financial accounting, enable audits and meet our legal</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Payment data • Legal case records • Information about goods and services 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR)</p> <p>The processing of your personal data for accounting and bookkeeping purposes is based on our legal obligation under the Accounting Act and other applicable accounting legislation. These obligations include that we must document, store</p>

	requirements to archive accounting data for statutory periods. This is a fundamental part of responsible and transparent financial management.		and in some cases report financial information that may contain personal data. The processing is necessary for us to be able to fulfill our obligations as a company subject to accounting obligations, and to ensure correct financial reporting and auditing. This is a central part of our obligation to conduct business in a lawful and transparent manner. If you have any questions about how we process personal data for accounting purposes, you are welcome to contact us. See contact details in Section 12.
1.17	<p>Transfer of claims to a new creditor</p> <p>We process your personal data in connection with the transfer of claims to a new owner, for example within the framework of agreements on single sales of credit portfolios or ongoing transfers of claims. The processing is necessary to ensure the correct administration of the claim even after it has been transferred, and to enable the new creditor to take the necessary measures to handle the payment. The purpose is to ensure continuity in the management of your debt and to fulfill our contractual and commercial obligations.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>The processing of your personal data in connection with the assignment of claims is based on our legitimate interest in being able to sell and administer credit claims in a commercially viable and efficient manner. This processing is necessary to fulfill our contractual and financial obligations and to ensure that the new creditor can handle the payment correctly. After weighing up our interests, we have assessed that our interest outweighs the infringement of the data subject's privacy that the processing may entail. If you would like to know more about how this assessment has been made, or if you would like to object to the processing, you are welcome to contact us. See contact details in Section 12</p>

1.18	<p>Acquisition of receivables in connection with purchases</p> <p>We process your personal data to administer the acquisition of the Merchant's receivables for payment of your purchase. This means that we become the new creditor and are responsible for handling payments towards you. This processing is necessary to enable us to fulfil our obligations in connection with the purchase, ensure correct invoicing and enable efficient handling of your payment.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Payment data • Credit assessment data • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>The processing of your personal data in connection with the assignment of a claim is based on our and the Merchant's legitimate interest in being able to sell or acquire an outstanding debt. After weighing up our interests, we have assessed that the processing is necessary to achieve this purpose, and that our interest in handling claims in an efficient and legally secure manner outweighs the infringement of the data subject's privacy that the processing may entail. If you would like to know more about how this assessment has been made, or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
1.19	<p>Calculation of commissions to Merchants and partners</p> <p>We process your personal data for the purpose of calculating remuneration and commissions to be paid to our Merchants, partners or other business relationships. The processing enables the correct, transparent and efficient management of commercial terms and conditions associated with your use of our services. Where possible, we anonymize the data before the analysis is carried out, which means that the information no longer constitutes personal data under data protection law. The aim is to maintain a fair and accurate financial accounting of our business transactions.</p>	<p>From other sources</p> <ul style="list-style-type: none"> • Payment data • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>The processing of your personal data for the purpose of calculating commissions and remuneration to suppliers or partners is based on our legitimate interest in ensuring correct and fair remuneration. After weighing up the interests, we have assessed that this processing is necessary to fulfil business contracts and administer our commercial relationships, without significantly affecting your privacy. If you would like to know more about this assessment or object to the processing, please see the contact details in Section 12.</p>

4.2 Credit cards

This section of the notice explains the purposes for which we process your personal data, the sources from which the data is collected, and the legal basis for processing when you apply for and use a credit card issued by TF Bank.

	Processing activity and purpose	Categories of personal data	Legal basis
2.1	<p>Customer relationship management. In accordance with the contract between you and TF Bank, we process your personal data in order to administer and fulfill our contractual relationship with you, depending on which of our services you use. This includes, for example, creating and administering your customer account, providing customer service, sending contract-related information and communicating about your services. The processing is necessary for us to fulfill our obligations under the contract entered into with you.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Agreement and explicit consent (Article 6.1(b) and Article 9.2(a) GDPR) We process your personal data because it is necessary to perform our agreement with you – for example, to deliver a requested service or product.</p> <p>If the service processes data that constitutes sensitive personal data (for example, from material you choose to upload), our processing is based on your explicit consent.</p>
2.2	<p>Payment processing We process your personal data in order to handle and execute payments connected to your use of our services. This includes, for example, registering and verifying payment details, processing transactions, managing refunds and chargebacks. The processing is necessary for us to fulfill our obligations under the contract entered into with you.</p>	<p>From you</p> <ul style="list-style-type: none"> • Payment data <p>From other sources</p> <ul style="list-style-type: none"> • Payment data 	<p>Agreement (Article. 6.1(b) GDPR) We process your personal data for payment purposes because it is necessary to perform our agreement with you – for example, to register and verify your payment details, process transactions, and manage refunds or chargebacks. The processing is therefore based on the necessity to fulfill our contractual obligations.</p>

2.3	<p>Credit assessment prior to and during a contractual customer relationship</p> <p>We process your personal data in order to carry out necessary credit assessments, either as part of assessing your application for our financial services or to follow up on an ongoing contractual relationship. This includes, for example and to the extent authorized by law, obtaining and analyzing information about your payment capacity, creditworthiness and financial situation in order to make informed decisions about granting credit or other financial products. This processing constitutes profiling and automated decision-making.</p> <p>For more information on profiling and automated decision-making, please see Section 7.</p> <p>For more information about the credit bureaus we use, please see Section 6.6.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Socio-demographic data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services. 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR) and legitimate interest (Article 6.1(f))</p> <p>The processing of your personal data is necessary to fulfil our legal obligations to carry out credit assessments when examining credit applications and to continuously monitor and manage credit risks during an ongoing customer relationship. These obligations follow from the Consumer Credit Act and other applicable financial market regulations and constitute a fundamental part of a responsible credit granting procedure. The processing is therefore a prerequisite for us to be able to conduct our credit operations in a safe and legal manner, and to safeguard both our own and our customers' financial stability.</p>
2.4	<p>Identification</p> <p>We process your personal data to identify you and verify your identity. This is necessary to ensure that it is indeed you who is using our services and to prevent unauthorized access, fraud or other improper use. By validating your identity, we contribute to a safer customer experience and strengthen the protection of both you and our business.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification Data • Compliance screening data • Financial data • Socio-demographical data • On-line behavior and device information • Communication data 	<p>Legal basis: Agreement and explicit consent (Article 6.1(b) and Article 9.2(a) GDPR)</p> <p>The processing of your personal data is necessary for us to fulfil our contractual obligations towards you, for example to provide the financial services you have requested or contracted for. In cases where we process sensitive personal data, this is only done with your consent, which we obtain and inform you of when the data is collected.</p>
2.5	<p>Risk assessment, fraud prevention and operational and financial risk management</p> <p>For the purpose of verifying identity, ensuring the accuracy of data provided and detecting and</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR)</p> <p>We process your personal data based on our legal obligation to identify, prevent and manage fraud</p>

	<p>preventing potential irregularities or criminal activity. The processing may include profiling and automated decision-making to assess the likelihood of fraud risks. Further information on such processing can be found in Section 7.</p>	<p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>and operational and financial risks. These obligations follow from applicable financial market regulation and are a fundamental prerequisite for a safe and stable financial system. The processing is therefore necessary for us to be able to conduct our business in a responsible manner and to protect both our customers and our organization. If you have any questions about this processing, please contact us. See contact details in Section 12.</p>
2.6	<p>To prevent money laundering and terrorist financing (AML/CTF) We process personal data for the purpose of complying with our legal obligations under the AML/CTF framework. This includes verifying your identity, assessing customer risk, and detecting and preventing suspicious or improper activity. The processing may include profiling and automated decision-making to assess the risk of you being involved in activities that violate money laundering laws. This processing constitutes profiling and automated decision-making. For more information on profiling and automated decision-making, please see Section 7.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR) The processing of your personal data is necessary to comply with our legal obligations to identify, prevent and combat money laundering and terrorist financing. These obligations follow from the EU Anti-Money Laundering Directive, the Anti-Money Laundering Regulation, and their implementation in national legislation, as well as other applicable financial market regulations. They constitute a central part of maintaining a safe, transparent and trustworthy financial system. The processing is therefore a prerequisite for us to conduct our business in a responsible and lawful manner, and to protect the integrity of both our customers and society.</p>
2.7	<p>To conduct customer surveys and collect your feedback Personal data is processed to enable the sending of surveys, invitations to customer interviews and requests for reviews via email, text message, telephone or other relevant communication channels. The purpose is to collect feedback that contributes to the</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR or Consent (Article 6.1 (a)) We process your personal data based on the consent obtained from you or our legitimate interest in conducting customer satisfaction surveys and consumer analysis. After weighing up our interests, we have concluded that this processing is necessary to improve our products</p>

	improvement of services and customer experience.		and services, and that our interest outweighs the potential intrusion into your personal privacy that the processing may entail. If you would like more information about this assessment or wish to object to the processing, please contact us. See contact details in Section 12.
2.8	<p>Maintaining network and information security</p> <p>We process your personal data to ensure the security of our IT systems and services. This includes monitoring network traffic, detecting and preventing unauthorized access, malware, phishing, and other security threats. We apply technical and organizational measures such as encryption, access control, and system logging to protect the confidentiality, integrity, and availability of information.</p> <p>Your data may also be used in security audits, incident management, and compliance with legal and regulatory requirements, including those related to financial supervision and cybersecurity standards and regulations. The purpose is to protect both our Customers and TF Bank from data breaches, disruptions, and other security risks.</p>	<p>From you:</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources:</p> <ul style="list-style-type: none"> • Contact and identification data • Payment data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR) and Legal obligation (Article 6.1 (c) GDPR)</p> <p>TF Bank processes your data to help maintain strong network and information security. This is essential for protecting our systems and ensuring that your personal information remains safe. We've carefully considered the impact of this processing and believe it's necessary to safeguard both our services and your experience as a customer. If you would like more information about this assessment or wish to object to the processing, please contact us. See contact details in Section 12.</p>
2.9	<p>Anonymization for service development and analysis</p> <p>We process your personal data by anonymizing it in order to be able to develop and improve our services and products, as well as to analyze customer behavior at an aggregate level. Anonymization ensures that the data can no longer be linked to you as an individual, which means that the information no longer constitutes personal data under data protection legislation.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>This processing is based on our legitimate interest in anonymizing personal data to enable product development and analysis of customer behavior. After weighing up our interests, we have assessed that the processing is necessary to achieve this purpose, and that our interest in developing and improving our services outweighs the intrusion into the privacy of the data subject that the processing may entail. By anonymizing the data, we also</p>

		<ul style="list-style-type: none"> • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>ensure that the use of personal data is limited to a minimum.</p> <p>If you would like to know more about how this assessment was made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
2.10	<p>Analytics to improve marketing and marketing channels</p> <p>We process your personal data to conduct customer segmentation and analysis to better understand different customer groups and their needs. This enables us to adapt our products, services, and communication to specific segments, ensuring that our offerings are relevant and aligned with customer preferences. The processing helps us identify patterns in customer behaviour and improve our overall service experience. This processing may involve profiling and automated decision-making. For more information on profiling and automated decision-making, please see Section 7</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>This processing is based on our legitimate interest in analyzing the results of our marketing and improving content, channels and customer communication. After weighing up our interests, we have assessed that the processing is necessary to achieve this purpose, and that our interest in streamlining and adapting our marketing outweighs the intrusion into the privacy of the data subject that the processing may entail. The analysis also contributes to a more relevant experience for you as a customer.</p> <p>If you would like to know more about how this assessment has been made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
2.11	<p>Marketing and customer surveys</p> <p>We process your personal data to provide and customize marketing, offers and customer surveys related to our products and services. This applies to both services you already use and similar offers within our consumer offering. The aim is to make the information more relevant to you, based on your interests and previous interactions.</p> <p>If you do not want to receive marketing from us, you can let us know at any time. We will then stop processing your personal data for this</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Online behavior and device information 	<p>Legal basis: Legitimate interest and consent (Article 6.1(f) and Article 6.1(a) GDPR)</p> <p>The processing of your personal data for the purpose of providing marketing and customer surveys is based on our legitimate interest in communicating with you in a relevant, effective and personalized manner. After weighing up our interests, we have assessed that this processing is necessary to achieve this purpose, and that our interest in improving the customer experience through personalized marketing outweighs the intrusion on the privacy of the data subject that the processing may entail.</p>

	purpose. Contact details can be found in Section 12.		If you would like to know more about how this assessment has been made, or if you would like to object to the processing, you are welcome to contact us. See contact details in Section 12. Depending on the channel we use, we might base our processing on your consent. You can withdraw your consent at any time. This does not affect the lawfulness of processing already carried out on the basis of consent.
2.12	<p>Analytics to develop services</p> <p>We process your personal data, including recording calls, to conduct analytics to develop and test our services and improve our risk management, fraud prevention and credit assessment models. This processing gives us better insight into how our services work in practice, which allows us to identify areas for improvement, ensure a safe user experience and make more informed business decisions.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>This processing is based on our legitimate interest in analyzing data for the purpose of developing, improving and validating our risk management, fraud prevention and credit assessment models. After weighing up our interests, we have assessed that the processing is necessary to achieve this purpose, and that our interest in ensuring accurate and reliable models outweighs the intrusion into the privacy of the data subject that the processing may entail. The work also contributes to increased financial stability and a fairer treatment of our customers.</p> <p>If you would like to know more about how this assessment has been made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
2.13	<p>Debt management and collection of overdue debts</p> <p>We process your personal data for the purpose of administering and collecting overdue debts, which may include reminders, collection requests, terminations and assignment of the claim to a third party. The processing is necessary to ensure the legal and efficient management of unpaid debts and to fulfill our</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>The processing of your personal data for the purpose of administering and collecting overdue debts is based on our legitimate interest in ensuring that outstanding receivables are handled efficiently and legally. After weighing up our interests, we have assessed that this processing is necessary to maintain payment discipline,</p>

	contractual and commercial obligations. The purpose is to maintain credit discipline and safeguard the financial stability of our business.	<ul style="list-style-type: none"> • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>safeguard our financial stability and fulfil our contractual rights. Our interest outweighs the infringement of the data subject's privacy that the processing may entail, especially since the measures are a natural part of the financial contractual relationship.</p> <p>If you would like to know more about how this assessment has been made, or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
2.14	<p>Protection of legal interests and management of legal claims</p> <p>We process your personal data to protect our legal interests, manage potential or actual litigation, and exercise, establish or defend legal claims. The processing enables us to act in disputes, comply with legal obligations, and responsibly manage risks that may affect our business or the rights of our customers.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>The processing of personal data for the purposes of protecting our legal interests and dealing with potential or actual disputes is based on our legitimate interest in being able to establish, exercise or defend legal claims. After weighing up our interests, we have assessed that the processing is necessary for this purpose and that our interest outweighs the intrusion on the privacy of the data subject that the processing may entail. In connection with a dispute, we may also need to collect additional personal data concerning you, in addition to those already specified in Section 3. If necessary for handling legal proceedings, sensitive personal data may also be processed, in accordance with Article 9.2(f) GDPR.</p> <p>If you would like to know more about how this assessment has been made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
2.15	<p>Communication via social media and messaging apps</p> <p>We process your personal data when you contact us via social media and messaging apps such as facebook, instagram and whatsapp. The</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data 	<p>Legal basis: Legitimate Interest and Agreement (Article 6.1(f) and Article. 6.1(b) GDPR)</p> <p>The processing of your personal data in connection with interactions via social media and messaging apps is either in order for us to perform</p>

	<p>purpose is to be able to handle and answer your questions or comments correctly and to be able to leave you messages. The data you share with us on these channels is also processed by the respective platform providers in accordance with their own data protection policies. This also applies to any responses we may have to you via the same channel. The processing enables efficient and accessible customer dialogue where you choose the contact method yourself.</p> <p>Please note that we will not be able to respond to your enquiries as a customer via social media, since it does not allow for proper identification.</p>	<ul style="list-style-type: none"> • Online behavior and device information • Communication data 	<p>a contract with you or based on our legitimate interest.</p> <p>For example, when you contact us to register for an event or request information, we process the data to provide the requested service and fulfill our contractual obligations.</p>
2.16	<p>Handling of data subject rights under data protection law</p> <p>We process your personal data in order to exercise and manage the rights you have as a data subject under data protection law, such as the right to access your data, have inaccurate data corrected, object to processing or request erasure. This processing enables us to respond to your requests in an accurate, secure and efficient manner, and to comply with our obligations under applicable data protection law.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR)</p> <p>The processing of your personal data to manage your rights as a data subject – such as the right of access, rectification, erasure, data portability, objection and restriction – is based on our legal obligation under the General Data Protection Regulation (GDPR). These obligations follow directly from applicable law and require us to be able to respond to and handle your requests in an accurate and documented manner.</p> <p>The processing is therefore necessary for us to be able to fulfill our obligations as a data controller and is a central part of ensuring your rights and our compliance with data protection law.</p> <p>If you have any questions about how we manage your rights, you are welcome to contact us. See contact details in Section 12.</p>
2.17	<p>Accounting and statutory accounting</p> <p>We process your personal data in order to fulfil our obligations under accounting legislation, including preparing, document and maintain</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR)</p> <p>The processing of your personal data for accounting and bookkeeping purposes is based on</p>

	<p>accounting records in accordance with applicable regulations. The processing is necessary to ensure accurate financial accounting, enable audits and meet our legal requirements to archive accounting data for statutory periods. This is a fundamental part of responsible and transparent financial management.</p>	<ul style="list-style-type: none"> • Payment data • Legal case records • Information about goods and services 	<p>our legal obligation under the Accounting Act and other applicable accounting legislation. These obligations include that we must document, store and in some cases report financial information that may contain personal data. The processing is necessary for us to be able to fulfill our obligations as a company subject to accounting obligations, and to ensure correct financial reporting and auditing. This is a central part of our obligation to conduct business in a lawful and transparent manner. If you have any questions about how we process personal data for accounting purposes, you are welcome to contact us. See contact details in Section 12.</p>
2.18	<p>Transfer of claims to a new creditor We process your personal data in connection with the transfer of claims to a new owner, for example within the framework of agreements on single sales of credit portfolios or ongoing transfers of claims. The processing is necessary to ensure the correct administration of the claim even after it has been transferred, and to enable the new creditor to take the necessary measures to handle the payment. The purpose is to ensure continuity in the management of your debt and to fulfill our contractual and commercial obligations.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR) The processing of your personal data in connection with the assignment of claims is based on our legitimate interest in being able to sell and administer credit claims in a commercially viable and efficient manner. This processing is necessary to fulfill our contractual and financial obligations and to ensure that the new creditor can handle the payment correctly. After weighing up our interests, we have assessed that our interest outweighs the infringement of the data subject's privacy that the processing may entail. If you would like to know more about how this assessment has been made, or if you would like to object to the processing, you are welcome to contact us. See contact details in Section 12</p>

4.3 Consumer lending

This section of the notice explains the purposes for which we process your personal data, the sources from which the data is collected, and the legal basis for processing when you apply for and use an unsecured loan provided by TF Bank. This includes the assessment of your creditworthiness, identity verification, and the management of your loan throughout its lifecycle.

	Processing activity and purpose	Categories of personal data	Legal basis
3.1	<p>Customer relationship management.</p> <p>In accordance with the contract between you and TF Bank, we process your personal data in order to administer and fulfill our contractual relationship with you, depending on which of our services you use. This includes, for example, creating and administering your customer account, providing customer service, sending contract-related information and communicating about your services. The processing is necessary for us to fulfill our obligations under the contract entered into with you.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Agreement and explicit consent (Article 6.1(b) and Article 9.2(a) GDPR)</p> <p>We process your personal data because it is necessary to perform our agreement with you – for example, to deliver a requested service or product.</p> <p>If the service processes data that constitutes sensitive personal data (for example, from material you choose to upload), our processing is based on your explicit consent.</p>
3.2	<p>Payment processing</p> <p>We process your personal data to handle and execute payments connected to your use of our services. This includes, for example, registering and verifying payment details, processing transactions, managing refunds and chargebacks. The processing is necessary for us to fulfill our obligations under the contract entered into with you.</p>	<p>From you</p> <ul style="list-style-type: none"> • Payment data <p>From other sources</p> <ul style="list-style-type: none"> • Payment data 	<p>Agreement (Article. 6.1(b) GDPR)</p> <p>We process your personal data for payment purposes because it is necessary to perform our agreement with you – for example, to register and verify your payment details, process transactions, and manage refunds or chargebacks. The processing is therefore based on the necessity to fulfill our contractual obligations.</p>

3.3	<p>Credit assessment prior to and during a contractual customer relationship We process your personal data to carry out necessary credit assessments, either as part of assessing your application for our financial services or to follow up on an ongoing contractual relationship. This includes, for example and to the extent authorized by law, obtaining and analyzing information about your payment capacity, creditworthiness and financial situation in order to make informed decisions about granting credit or other financial products. This processing constitutes profiling and automated decision-making.</p> <p>For more information on profiling and automated decision-making, please see Section 7.</p> <p>For more information about the credit bureaus we use, please see Section 6.6.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Socio-demographic data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services. 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR) and Legitimate Interest (Article 6.1.(f) GDPR) The processing of your personal data is necessary to fulfil our legal obligations to carry out credit assessments when examining credit applications and to continuously monitor and manage credit risks during an ongoing customer relationship. These obligations follow from the Consumer Credit Act and other applicable financial market regulations and constitute a fundamental part of a responsible credit granting procedure. The processing is therefore a prerequisite for us to be able to conduct our credit operations in a safe and legal manner, and to safeguard both our own and our customers' financial stability.</p>
3.4	<p>Identification We process your personal data to identify you and verify your identity. This is necessary to ensure that it is indeed you who is using our services and to prevent unauthorized access, fraud or other improper use. By validating your identity, we contribute to a safer customer experience and strengthen the protection of both you and our business.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification Data • Compliance screening data • Financial data • Socio-demographical data • On-line behavior and device information • Communication data 	<p>Legal basis: Agreement and explicit consent (Article 6.1(b) and Article 9.2(a) GDPR) The processing of your personal data is necessary for us to fulfil our contractual obligations towards you, for example to provide the financial services you have requested or contracted for. In cases where we process sensitive personal data, this is only done with your consent, which we obtain and inform you of when the data is collected.</p>
3.5	<p>Risk assessment, fraud prevention and operational and financial risk management For the purpose of verifying identity, ensuring the accuracy of data provided and detecting and preventing potential irregularities or criminal</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p>	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR) We process your personal data based on our legal obligation to identify, prevent and manage fraud and operational and financial risks. These</p>

	<p>activity. The processing may include profiling and automated decision-making to assess the likelihood of fraud risks. Further information on such processing can be found in Section 7.</p>	<ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>obligations follow from applicable financial market regulation and are a fundamental prerequisite for a safe and stable financial system. The processing is therefore necessary for us to be able to conduct our business in a responsible manner and to protect both our customers and our organization. If you have any questions about this processing, please contact us. See contact details in Section 12.</p>
3.6	<p>To prevent money laundering and terrorist financing (AML/CTF) We process personal data for the purpose of complying with our legal obligations under the AML/CTF framework. This includes verifying your identity, assessing customer risk, and detecting and preventing suspicious or improper activity. The processing may include profiling and automated decision-making to assess the risk of you being involved in activities that violate money laundering laws. This processing constitutes profiling and automated decision-making. For more information on profiling and automated decision-making, please see Section 7.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR) The processing of your personal data is necessary to comply with our legal obligations to identify, prevent and combat money laundering and terrorist financing. These obligations follow from the Act on Measures Against Money Laundering and Terrorist Financing and other applicable regulations within financial market law and constitute a central part of a safe and transparent financial system. The processing is therefore a prerequisite for us to be able to conduct our business in a responsible and lawful manner, and to protect the safety of both our customers and society.</p>
3.7	<p>To conduct customer surveys and collect your feedback Personal data is processed to enable the sending of surveys, invitations to customer interviews and requests for reviews via email, text message, telephone or other relevant communication channels. The purpose is to collect feedback that contributes to the improvement of services and customer experience.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR) We process your personal data based on our legitimate interest in conducting customer satisfaction surveys and consumer analysis. After weighing up our interests, we have concluded that this processing is necessary to improve our products and services, and that our interest outweighs the potential intrusion into your personal privacy that the processing may entail.</p>

			If you would like more information about this assessment or wish to object to the processing, please contact us. See contact details in Section 12.
3.8	<p>Maintaining network and information security</p> <p>We process your personal data to ensure the security of our IT systems and services. This includes monitoring network traffic, detecting and preventing unauthorized access, malware, phishing, and other security threats. We apply technical and organizational measures such as encryption, access control, and system logging to protect the confidentiality, integrity, and availability of information.</p> <p>Your data may also be used in security audits, incident management, and compliance with legal and regulatory requirements, including those related to financial supervision and cybersecurity standards and regulations. The purpose is to protect both our Customers and TF Bank from data breaches, disruptions, and other security risks.</p>	<p>From you:</p> <ul style="list-style-type: none"> Contact and identification data <p>From other sources:</p> <ul style="list-style-type: none"> Contact and identification data Payment data Online behavior and device information Communication data Legal case records Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR) and Legal obligations (Article 6.1 (c) GDPR)</p> <p>TF Bank processes your data to help maintain strong network and information security. This is essential for protecting our systems and ensuring that your personal information remains safe. We've carefully considered the impact of this processing and believe it's necessary to safeguard both our services and your experience as a customer. If you would like more information about this assessment or wish to object to the processing, please contact us. See contact details in Section 12.</p>
3.9	<p>Anonymization for service development and analysis</p> <p>We process your personal data by anonymizing it in order to be able to develop and improve our services and products, as well as to analyze customer behavior at an aggregate level. Anonymization ensures that the data can no longer be linked to you as an individual, which means that the information no longer constitutes personal data under data protection legislation.</p>	<p>From you</p> <ul style="list-style-type: none"> Contact and identification data Socio-demographic data Communication data <p>From other sources</p> <ul style="list-style-type: none"> Contact and identification data Compliance screening data Payment data Credit assessment data Socio-demographic data Online behavior and device information Communication data Legal case records 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>This processing is based on our legitimate interest in anonymizing personal data to enable product development and analysis of customer behavior. After weighing up our interests, we have assessed that the processing is necessary to achieve this purpose, and that our interest in developing and improving our services outweighs the intrusion into the privacy of the data subject that the processing may entail. By anonymizing the data, we also ensure that the use of personal data is limited to a minimum.</p>

		<ul style="list-style-type: none"> Information about goods and services 	<p>If you would like to know more about how this assessment was made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
3.10	<p>Analytics to improve marketing and marketing channels</p> <p>We process your personal data to conduct customer segmentation and analysis to better understand different customer groups and their needs. This enables us to adapt our products, services, and communication to specific segments, ensuring that our offerings are relevant and aligned with customer preferences. The processing helps us identify patterns in customer behaviour and improve our overall service experience. This processing may involve profiling and automated decision-making. For more information on profiling and automated decision-making, please see Section 7.</p>	<p>From you</p> <ul style="list-style-type: none"> Contact and identification data Socio-demographic data Communication data <p>From other sources</p> <ul style="list-style-type: none"> Contact and identification data Compliance screening data Payment data Credit assessment data Socio-demographic data Online behavior and device information Communication data Legal case records Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>This processing is based on our legitimate interest in analyzing the results of our marketing and improving content, channels and customer communication. After weighing up our interests, we have assessed that the processing is necessary to achieve this purpose, and that our interest in streamlining and adapting our marketing outweighs the intrusion into the privacy of the data subject that the processing may entail. The analysis also contributes to a more relevant experience for you as a customer.</p> <p>If you would like to know more about how this assessment has been made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
3.11	<p>Marketing and customer surveys</p> <p>We process your personal data to provide and customize marketing, offers and customer surveys related to our products and services. This applies to both services you already use and similar offers within our consumer offering. The aim is to make the information more relevant to you, based on your interests and previous interactions.</p> <p>If you do not want to receive marketing from us, you can let us know at any time. We will then stop processing your personal data for this purpose. Contact details can be found in Section 12.</p>	<p>From you</p> <ul style="list-style-type: none"> Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> Contact and identification data Online behavior and device information 	<p>Legal basis: Legitimate interest and consent (Article 6.1(f) and Article 6.1(a) GDPR)</p> <p>The processing of your personal data for the purpose of providing marketing and customer surveys is based on our legitimate interest in communicating with you in a relevant, effective and personalized manner. After weighing up our interests, we have assessed that this processing is necessary to achieve this purpose, and that our interest in improving the customer experience through personalized marketing outweighs the intrusion on the privacy of the data subject that the processing may entail.</p> <p>If you would like to know more about how this assessment has been made, or if you would like to</p>

			<p>object to the processing, you are welcome to contact us. See contact details in Section 12. Depending on the channel we use, we might base our processing on your consent. You can withdraw your consent at any time. This does not affect the lawfulness of processing already carried out on the basis of consent.</p>
3.12	<p>Analytics to develop services We process your personal data, including recording calls, to conduct analytics to develop and test our services and improve our risk management, fraud prevention and credit assessment models. This processing gives us better insight into how our services work in practice, which allows us to identify areas for improvement, ensure a safe user experience and make more informed business decisions.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR) This processing is based on our legitimate interest in analyzing data for the purpose of developing, improving and validating our risk management, fraud prevention and credit assessment models. After weighing up our interests, we have assessed that the processing is necessary to achieve this purpose, and that our interest in ensuring accurate and reliable models outweighs the intrusion into the privacy of the data subject that the processing may entail. The work also contributes to increased financial stability and a fairer treatment of our customers. If you would like to know more about how this assessment has been made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
3.13	<p>Debt management and collection of overdue debts We process your personal data for the purpose of administering and collecting overdue debts, which may include reminders, collection requests, terminations and assignment of the claim to a third party. The processing is necessary to ensure the legal and efficient management of unpaid debts and to fulfill our contractual and commercial obligations. The</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR) The processing of your personal data for the purpose of administering and collecting overdue debts is based on our legitimate interest in ensuring that outstanding receivables are handled efficiently and legally. After weighing up our interests, we have assessed that this processing is necessary to maintain payment discipline, safeguard our financial stability and fulfil our contractual rights. Our interest outweighs the</p>

	purpose is to maintain credit discipline and safeguard the financial stability of our business.	<ul style="list-style-type: none"> • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>infringement of the data subject's privacy that the processing may entail, especially since the measures are a natural part of the financial contractual relationship.</p> <p>If you would like to know more about how this assessment has been made, or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
3.14	<p>Protection of legal interests and management of legal claims</p> <p>We process your personal data to protect our legal interests, manage potential or actual litigation, and exercise, establish or defend legal claims. The processing enables us to act in disputes, comply with legal obligations, and responsibly manage risks that may affect our business or the rights of our customers.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>The processing of personal data for the purposes of protecting our legal interests and dealing with potential or actual disputes is based on our legitimate interest in being able to establish, exercise or defend legal claims. After weighing up our interests, we have assessed that the processing is necessary for this purpose and that our interest outweighs the intrusion on the privacy of the data subject that the processing may entail. In connection with a dispute, we may also need to collect additional personal data concerning you, in addition to those already specified in Section 3. If necessary for handling legal proceedings, sensitive personal data may also be processed, in accordance with Article 9.2(f) GDPR. If you would like to know more about how this assessment has been made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
3.15	<p>Communication via social media and messaging apps</p> <p>We process your personal data when you contact us via social media and messaging apps such as Facebook, Instagram, and WhatsApp. The purpose is to be able to handle and answer your questions or comments correctly and to be</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Online behavior and device information • Communication data 	<p>Legal basis: Legitimate Interest and Agreement (Article 6.1(f) and Article. 6.1(b) GDPR)</p> <p>The processing of your personal data in connection with interactions via social media and messaging apps is either in order for us to perform a contract with you or based on our legitimate interest.</p>

	<p>able to leave you messages. The data you share with us on these channels is also processed by the respective platform providers in accordance with their own data protection policies. This also applies to any responses we may have to you via the same channel. The processing enables efficient and accessible customer dialogue where you choose the contact method yourself.</p> <p>Please note that we will not be able to respond to your enquiries as a customer via social media, since it does not allow for proper identification.</p>		<p>For example, when you contact us to register for an event or request information, we process the data to provide the requested service and fulfill our contractual obligations.</p>
3.16	<p>Handling of data subject rights under data protection law</p> <p>We process your personal data in order to exercise and manage the rights you have as a data subject under data protection law, such as the right to access your data, have inaccurate data corrected, object to processing or request erasure. This processing enables us to respond to your requests in an accurate, secure and efficient manner, and to comply with our obligations under applicable data protection law.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Credit assessment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR)</p> <p>The processing of your personal data to manage your rights as a data subject – such as the right of access, rectification, erasure, data portability, objection and restriction – is based on our legal obligation under the General Data Protection Regulation (GDPR). These obligations follow directly from applicable law and require us to be able to respond to and handle your requests in an accurate and documented manner. The processing is therefore necessary for us to be able to fulfill our obligations as a data controller and is a central part of ensuring your rights and our compliance with data protection law. If you have any questions about how we manage your rights, you are welcome to contact us. See contact details in Section 12.</p>
3.17	<p>Accounting and statutory accounting</p> <p>We process your personal data in order to fulfil our obligations under accounting legislation, including to prepare, document and maintain accounting records in accordance with applicable regulations. The processing is</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Payment data • Legal case records 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR)</p> <p>The processing of your personal data for accounting and bookkeeping purposes is based on our legal obligation under the Accounting Act and other applicable accounting legislation. These</p>

	necessary to ensure accurate financial accounting, enable audits and meet our legal requirements to archive accounting data for statutory periods. This is a fundamental part of responsible and transparent financial management.	<ul style="list-style-type: none"> Information about goods and services 	<p>obligations include that we must document, store and in some cases report financial information that may contain personal data.</p> <p>The processing is necessary for us to be able to fulfill our obligations as a company subject to accounting obligations, and to ensure correct financial reporting and auditing. This is a central part of our obligation to conduct business in a lawful and transparent manner.</p> <p>If you have any questions about how we process personal data for accounting purposes, you are welcome to contact us. See contact details in Section 12.</p>
3.18	<p>Transfer of claims to a new creditor</p> <p>We process your personal data in connection with the transfer of claims to a new owner, for example within the framework of agreements on single sales of credit portfolios or ongoing transfers of claims. The processing is necessary to ensure the correct administration of the claim even after it has been transferred, and to enable the new creditor to take the necessary measures to handle the payment. The purpose is to ensure continuity in the management of your debt and to fulfill our contractual and commercial obligations.</p>	<p>From you</p> <ul style="list-style-type: none"> Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> Contact and identification data Compliance screening data Payment data Credit assessment data Socio-demographic data Online behavior and device information Communication data Legal case records Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>The processing of your personal data in connection with the assignment of claims is based on our legitimate interest in being able to sell and administer credit claims in a commercially viable and efficient manner. This processing is necessary to fulfill our contractual and financial obligations and to ensure that the new creditor can handle the payment correctly. After weighing up our interests, we have assessed that our interest outweighs the infringement of the data subject's privacy that the processing may entail.</p> <p>If you would like to know more about how this assessment has been made, or if you would like to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>

4.4 Deposits

This section of the notice explains the purposes for which we process your personal data, the sources from which the data is collected, and the legal basis for processing when you open and manage a deposit account with TF Bank. This includes verifying your identity, fulfilling regulatory obligations, and administering your account and related transactions.

	Processing activity and purpose	Categories of personal data	Legal basis
4.1	<p>Customer relationship management. In accordance with the contract between you and TF Bank, we process your personal data in order to administer and fulfill our contractual relationship with you, depending on which of our services you use. This includes, for example, creating and administering your customer account, providing customer service, sending contract-related information and communicating about your services. The processing is necessary for us to fulfill our obligations under the contract entered into with you.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Deposits and withdrawals data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records 	<p>Agreement and explicit consent (Article 6.1(b) and Article 9.2(a) GDPR) We process your personal data because it is necessary to perform our agreement with you – for example, to deliver a requested service or product.</p> <p>If the service processes data that constitutes sensitive personal data (for example, from material you choose to upload), our processing is based on your explicit consent.</p>
4.2	<p>Deposits and withdrawals processing We process your personal data in order to handle and execute deposits and withdrawals connected to your use of our services. This includes, for example, registering and verifying payment details, processing, deposits and withdrawals. The processing is necessary for us to fulfill our obligations under the contract entered into with you.</p>	<p>From you</p> <ul style="list-style-type: none"> • Payment data <p>From other sources</p> <ul style="list-style-type: none"> • Payment data 	<p>Agreement (Article. 6.1(b) GDPR) We process your personal data for payment purposes because it is necessary to perform our agreement with you – for example, to register and verify your payment details, process transactions, and manage refunds or chargebacks. The processing is therefore based on the necessity to fulfill our contractual obligations.</p>

4.3	<p>Identification</p> <p>We process your personal data to identify you and verify your identity. This is necessary to ensure that it is indeed you who is using our services and to prevent unauthorized access, fraud or other improper use. By validating your identity, we contribute to a safer customer experience and strengthen the protection of both you and our business.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification Data • Compliance screening data • Financial data • Socio-demographical data • On-line behavior and device information • Communication data 	<p>Legal basis: Agreement and explicit consent (Article 6.1(b) and Article 9.2(a) GDPR)</p> <p>The processing of your personal data is necessary for us to fulfil our contractual obligations towards you, for example to provide the financial services you have requested or contracted for. In cases where we process sensitive personal data, this is only done with your consent, which we obtain and inform you of when the data is collected.</p>
4.4	<p>Risk assessment, fraud prevention and operational and financial risk management</p> <p>For the purpose of verifying identity, ensuring the accuracy of data provided and detecting and preventing potential irregularities or criminal activity. The processing may include profiling and automated decision-making to assess the likelihood of fraud risks. Further information on such processing can be found in Section 7.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Deposits and withdrawals data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR)</p> <p>We process your personal data based on our legal obligation to identify, prevent and manage fraud and operational and financial risks. These obligations follow from applicable financial market regulation and are a fundamental prerequisite for a safe and stable financial system. The processing is therefore necessary for us to be able to conduct our business in a responsible manner and to protect both our customers and our organization. If you have any questions about this processing, please contact us. See contact details in Section 12.</p>
4.5	<p>To prevent money laundering and terrorist financing (AML/CTF)</p> <p>We process personal data for the purpose of complying with our legal obligations under the AML/CTF framework. This includes verifying your identity, assessing customer risk, and detecting and preventing suspicious or improper activity. The processing may include profiling and automated decision-making to assess the risk of</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Deposits and withdrawals data 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR)</p> <p>The processing of your personal data is necessary to comply with our legal obligations to identify, prevent and combat money laundering and terrorist financing. These obligations follow from the Act on Measures Against Money Laundering and Terrorist Financing and other applicable regulations within financial market law and</p>

	<p>you being involved in activities that violate money laundering laws.</p> <p>This processing constitutes profiling and automated decision-making. For more information on profiling and automated decision-making, please see Section 7.</p>	<ul style="list-style-type: none"> • Socio-demographic data • Online behavior and device information • Communication data • Legal case records 	<p>constitute a central part of a safe and transparent financial system. The processing is therefore a prerequisite for us to be able to conduct our business in a responsible and lawful manner, and to protect the safety of both our customers and society.</p>
4.6	<p>Maintaining network and information security</p> <p>We process your personal data to ensure the security of our IT systems and services. This includes monitoring network traffic, detecting and preventing unauthorized access, malware, phishing, and other security threats. We apply technical and organizational measures such as encryption, access control, and system logging to protect the confidentiality, integrity, and availability of information.</p> <p>Your data may also be used in security audits, incident management, and compliance with legal and regulatory requirements, including those related to financial supervision and cybersecurity standards and regulations. The purpose is to protect both our Customers and TF Bank from data breaches, disruptions, and other security risks.</p>	<p>From you:</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources:</p> <ul style="list-style-type: none"> • Contact and identification data • Deposits and withdrawals data • Online behavior and device information • Communication data • Legal case records 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>TF Bank processes your data to help maintain strong network and information security. This is essential for protecting our systems and ensuring that your personal information remains safe. We've carefully considered the impact of this processing and believe it's necessary to safeguard both our services and your experience as a customer. If you would like more information about this assessment or wish to object to the processing, please contact us. See contact details in Section 12.</p>
4.7	<p>Anonymization for service development and analysis</p> <p>We process your personal data by anonymizing it in order to be able to develop and improve our services and products, as well as to analyze customer behavior at an aggregate level. Anonymization ensures that the data can no longer be linked to you as an individual, which means that the information no longer constitutes personal data under data protection legislation.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Socio-demographic data • Online behavior and device information • Communication data 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>This processing is based on our legitimate interest in anonymizing personal data to enable product development and analysis of customer behavior. After weighing up our interests, we have assessed that the processing is necessary to achieve this purpose, and that our interest in developing and improving our services outweighs the intrusion into the privacy of the data subject that the processing may entail. By anonymizing the data, we also</p>

		<ul style="list-style-type: none"> Legal case records 	<p>ensure that the use of personal data is limited to a minimum.</p> <p>If you would like to know more about how this assessment was made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
4.8	<p>Analytics to improve marketing and marketing channels</p> <p>We process your personal data to conduct customer segmentation and analysis to better understand different customer groups and their needs. This enables us to adapt our products, services, and communication to specific segments, ensuring that our offerings are relevant and aligned with customer preferences. The processing helps us identify patterns in customer behaviour and improve our overall service experience. This processing may involve profiling and automated decision-making. For more information on profiling and automated decision-making, please see Section 7.</p>	<p>From you</p> <ul style="list-style-type: none"> Contact and identification data Socio-demographic data Communication data <p>From other sources</p> <ul style="list-style-type: none"> Contact and identification data Compliance screening data Payment data Credit assessment data Socio-demographic data Online behavior and device information Communication data Legal case records Information about goods and services 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>This processing is based on our legitimate interest in analyzing the results of our marketing and improving content, channels and customer communication. After weighing up our interests, we have assessed that the processing is necessary to achieve this purpose, and that our interest in streamlining and adapting our marketing outweighs the intrusion into the privacy of the data subject that the processing may entail. The analysis also contributes to a more relevant experience for you as a customer.</p> <p>If you would like to know more about how this assessment has been made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
4.9	<p>Marketing and customer surveys</p> <p>We process your personal data to provide and customize marketing, offers and customer surveys related to our products and services. This applies to both services you already use and similar offers within our consumer offering. The aim is to make the information more relevant to you, based on your interests and previous interactions.</p> <p>If you do not want to receive marketing from us, you can let us know at any time. We will then stop processing your personal data for this</p>	<p>From you</p> <ul style="list-style-type: none"> Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> Contact and identification data Online behavior and device information 	<p>Legal basis: Legitimate interest and consent (Article 6.1(f) and Article 6.1(a) GDPR)</p> <p>The processing of your personal data for the purpose of providing marketing and customer surveys is based on our legitimate interest in communicating with you in a relevant, effective and personalized manner. After weighing up our interests, we have assessed that this processing is necessary to achieve this purpose, and that our interest in improving the customer experience through personalized marketing outweighs the intrusion on the privacy of the data subject that the processing may entail.</p>

	purpose. Contact details can be found in Section 12.		If you would like to know more about how this assessment has been made, or if you would like to object to the processing, you are welcome to contact us. See contact details in Section 12. Depending on the channel we use, we might base our processing on your consent. You can withdraw your consent at any time. This does not affect the lawfulness of processing already carried out on the basis of consent.
4.10	<p>Analytics to develop services</p> <p>We process your personal data, including recording calls, to conduct analytics to develop and test our services and improve our risk management, fraud prevention and credit assessment models. This processing gives us better insight into how our services work in practice, which allows us to identify areas for improvement, ensure a safe user experience and make more informed business decisions.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data Socio-demographic data • Online behavior and device information • Communication data • Legal case records 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>This processing is based on our legitimate interest in analyzing data for the purpose of developing, improving and validating our risk management, fraud prevention and credit assessment models. After weighing up our interests, we have assessed that the processing is necessary to achieve this purpose, and that our interest in ensuring accurate and reliable models outweighs the intrusion into the privacy of the data subject that the processing may entail. The work also contributes to increased financial stability and a fairer treatment of our customers.</p> <p>If you would like to know more about how this assessment has been made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
4.11	<p>Protection of legal interests and management of legal claims</p> <p>We process your personal data to protect our legal interests, manage potential or actual litigation, and exercise, establish or defend legal claims. The processing enables us to act in disputes, comply with legal obligations, and responsibly manage risks that may affect our business or the rights of our customers.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data 	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>The processing of personal data for the purposes of protecting our legal interests and dealing with potential or actual disputes is based on our legitimate interest in being able to establish, exercise or defend legal claims. After weighing up our interests, we have assessed that the processing is necessary for this purpose and that</p>

		<ul style="list-style-type: none"> • Socio-demographic data • Online behavior and device information • Communication data • Legal case records 	<p>our interest outweighs the intrusion on the privacy of the data subject that the processing may entail. In connection with a dispute, we may also need to collect additional personal data concerning you, in addition to those already specified in Section 3. If necessary for handling legal proceedings, sensitive personal data may also be processed, in accordance with Article 9.2(f) GDPR. If you would like to know more about how this assessment has been made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
4.12	<p>Handling of data subject rights under data protection law</p> <p>We process your personal data in order to exercise and manage the rights you have as a data subject under data protection law, such as the right to access your data, have inaccurate data corrected, object to processing or request erasure. This processing enables us to respond to your requests in an accurate, secure and efficient manner, and to comply with our obligations under applicable data protection law.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Compliance screening data • Payment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR)</p> <p>The processing of your personal data to manage your rights as a data subject – such as the right of access, rectification, erasure, data portability, objection and restriction – is based on our legal obligation under the General Data Protection Regulation (GDPR). These obligations follow directly from applicable law and require us to be able to respond to and handle your requests in an accurate and documented manner. The processing is therefore necessary for us to be able to fulfill our obligations as a data controller and is a central part of ensuring your rights and our compliance with data protection law. If you have any questions about how we manage your rights, you are welcome to contact us. See contact details in Section 12.</p>
4.13	<p>Accounting and statutory accounting</p> <p>We process your personal data in order to fulfil our obligations under accounting legislation, including to prepare, document and maintain accounting records in accordance with applicable regulations. The processing is</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Deposits and withdrawals data • Legal case records 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR)</p> <p>The processing of your personal data for accounting and bookkeeping purposes is based on our legal obligation under the Accounting Act and other applicable accounting legislation. These</p>

	<p>necessary to ensure accurate financial accounting, enable audits and meet our legal requirements to archive accounting data for statutory periods. This is a fundamental part of responsible and transparent financial management.</p>		<p>obligations include that we must document, store and in some cases report financial information that may contain personal data.</p> <p>The processing is necessary for us to be able to fulfill our obligations as a company subject to accounting obligations, and to ensure correct financial reporting and auditing. This is a central part of our obligation to conduct business in a lawful and transparent manner.</p> <p>If you have any questions about how we process personal data for accounting purposes, you are welcome to contact us. See contact details in Section 12.</p>
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4.5 Insurance

This section of the notice explains the purposes for which we process your personal data, the sources from which the data is collected, and the legal basis for processing when you apply for and are covered by a Payment Protection Insurance (PPI) policy offered by TF Bank. This includes assessing your eligibility, managing your insurance agreement and claims, and fulfilling regulatory and contractual obligations.

	Processing activity and purpose	Categories of personal data	Legal basis
5.1	<p>Managing an insurance agreement</p> <p>We process your personal data to assist you in managing your insurance agreement. This includes informing the insurance company about the insurance agreement, handling policy changes and renewals, premium payments, as well as responding to service requests and handling potential complaints.</p>	<p>From you</p> <ul style="list-style-type: none"> Contact and identification data Socio-demographic data Communication data <p>From other sources</p> <ul style="list-style-type: none"> Contact and identification data Payment data Socio-demographic data Communication data Legal case records 	<p>Legal basis: Agreement (Article. 6.1(b) GDPR) and legal obligation (Article 6.1(c) GDPR)</p> <p>The processing of your personal data is necessary for us to fulfil our contractual obligations towards you. If we handle a complaint, the processing of personal data is based on a legal obligation. If you have any questions about how we process personal data, you are welcome to contact us. See contact details in Section 12.</p>
5.2	<p>Identification</p> <p>We process your personal data to identify you and verify your identity. This is necessary to ensure that it is indeed you who is using our services and to prevent unauthorized access, fraud or other improper use. By validating your identity, we contribute to a safer customer experience and strengthen the protection of both you and our business.</p>	<p>From you</p> <ul style="list-style-type: none"> Contact and identification data <p>From other sources</p> <ul style="list-style-type: none"> Contact and identification Data 	<p>Legal basis: Legitimate interest and explicit consent (Article 6.1(f) and Article 9.2(a) GDPR)</p> <p>The processing of your personal data is based on our legitimate interest and is necessary for us to fulfil our contractual obligations, for example to provide the insurance distribution you have requested or contracted for. In cases where we process sensitive personal data, this is only done with your explicit consent, which we obtain and inform you of at the time the data is collected.</p>
5.3	<p>Protection of legal interests and management of legal claims</p> <p>We process your personal data to protect our legal interests, manage potential or actual litigation, and exercise, establish or defend legal</p>	<p>From you</p> <ul style="list-style-type: none"> Contact and identification data Socio-demographic data Communication data <p>From other sources</p>	<p>Legal basis: Legitimate interest (Article 6.1(f) GDPR)</p> <p>The processing of personal data for the purposes of protecting our legal interests and dealing with potential or actual disputes is based on our</p>

	<p>claims. The processing enables us to act in disputes, comply with legal obligations, and responsibly manage risks that may affect our business or the rights of our customers.</p>	<ul style="list-style-type: none"> • Contact and identification data • Payment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>legitimate interest in being able to establish, exercise or defend legal claims. After weighing up our interests, we have assessed that the processing is necessary for this purpose and that our interest outweighs the intrusion on the privacy of the data subject that the processing may entail. In connection with a dispute, we may also need to collect additional personal data concerning you, in addition to those already specified in Section 3. If necessary for handling legal proceedings, sensitive personal data may also be processed, in accordance with Article 9.2(f) GDPR. If you would like to know more about how this assessment has been made or if you wish to object to the processing, you are welcome to contact us. See contact details in Section 12.</p>
5.4	<p>Handling of data subject rights under data protection law We process your personal data in order to exercise and manage the rights you have as a data subject under data protection law, such as the right to access your data, have inaccurate data corrected, object to processing or request erasure. This processing enables us to respond to your requests in an accurate, secure and efficient manner, and to comply with our obligations under applicable data protection law.</p>	<p>From you</p> <ul style="list-style-type: none"> • Contact and identification data • Socio-demographic data • Communication data <p>From other sources</p> <ul style="list-style-type: none"> • Contact and identification data • Payment data • Socio-demographic data • Online behavior and device information • Communication data • Legal case records • Information about goods and services 	<p>Legal basis: Legal obligation (Article 6.1(c) GDPR) The processing of your personal data to manage your rights as a data subject – such as the right of access, rectification, erasure, data portability, objection and restriction – is based on our legal obligation under the General Data Protection Regulation (GDPR). These obligations follow directly from applicable law and require us to be able to respond to and handle your requests in an accurate and documented manner. The processing is therefore necessary for us to be able to fulfill our obligations as a data controller and is a central part of ensuring your rights and our compliance with data protection law. If you have any questions about how we manage your rights, you are welcome to contact us. See contact details in Section 12.</p>

5 How long do we store personal data?

TF Bank retains your personal data only for as long as necessary to fulfill the purposes outlined in this notice and in the tables above, unless a longer retention period is required or permitted by applicable law. The duration of data retention depends on the purpose of processing and the legal basis applied:

- **Contractual Relationships:** When personal data is processed to fulfill a contract between you and TF Bank - such as for credit approval, payment processing, or customer service - it is retained for the duration of the contractual relationship.
- **Legal Obligations:** To comply with statutory requirements, such as those under the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF) and the Accounting Act, TF Bank retains relevant personal data for five (5) and seven (7) years respectively, following the end of the customer relationship or the close of the financial year.
- **No Contractual Relationship:** If you have contacted TF Bank without entering into a contractual agreement, and there is no legal obligation to retain your data, your personal information will be stored only for as long as necessary to fulfill the relevant purpose. Typically, this period does not exceed three (3) months, unless a longer retention period is justified.
- **Protection Against Legal Claims:** In certain cases, even where no legal obligation exists, TF Bank may retain personal data based on a legitimate interest in defending against potential legal claims. Such retention is subject to a careful assessment of necessity and proportionality, and the data will be stored in accordance with applicable statutory limitation periods.

Please note that the retention of personal data does not imply that it may be used for purposes beyond those for which it was originally collected. For example, data retained under the Accounting Act may only be used for accounting purposes and cannot be used for marketing, profiling, or any unrelated processing activities.

You always have the right to request the deletion of your personal data, as outlined in Section 10. If we are unable to fulfill your request due to legal obligations, we will inform you of the reason for the denial.

6 Disclosure and transfer of personal data

Your personal data is protected by banking secrecy, which means that TF Bank is not permitted to disclose any personal data to unauthorized parties. Before personal data is disclosed to authorized recipients, TF Bank ensures that adequate measures are taken to ensure legal and secure processing. This includes, among other things, entering into agreements on the transfer of personal data or agreements on personal data processing with the recipients. These agreements include reasonable contractual, legal, technical and organizational measures to ensure that your data is processed with an adequate level of protection and in accordance with applicable law.

Before sharing, TF Bank carefully assesses the necessity and proportionality of the processing to ensure it aligns with your rights under data protection laws. All processing is carried out with appropriate safeguards in place.

Personal data will be disclosed or transferred to the following third-party categories of recipients:

6.1 Suppliers, subcontractors and partners

TF Bank may disclose personal data to trusted suppliers, subcontractors and partners. These recipients support TF Bank by providing essential services and functions that TF Bank cannot perform internally. Examples include providers of software solutions, data storage services, business consultants, and affiliated companies.

Purpose and legal basis: The disclosure of personal data to these parties is based on TF Bank's legitimate interest in accessing necessary services and operational support. TF Bank ensures that such processing is strictly necessary to fulfill this interest and that appropriate safeguards are in place to protect your personal data.

6.2 Companies within the Avarda Group

TF Bank may share personal data with other companies within the Avarda Group. Such sharing enables TF Bank to manage its operations efficiently, provide centralized IT and security services, ensure consistent customer experience, and comply with internal governance, risk management, and regulatory requirements.

Purpose and legal basis: The sharing of personal data within the Avarda Group is based on TF Bank's legitimate interest (Article 6(1)(f) GDPR) in ensuring effective internal administration, centralized IT and security management, consolidated reporting, group-level risk and compliance oversight, and fulfilment of legal and regulatory obligations that apply to the Avarda Group as a whole (e.g. anti-money laundering, credit risk monitoring, capital adequacy, and audit requirements).

6.3 Authorities

TF Bank may disclose personal data to public authorities such as law enforcement agencies, consumer protection authorities, financial supervisory bodies, tax authorities, or courts, where such disclosure is required or permitted by law. This may include, for example, reporting obligations related to anti-money laundering (AML), counter-terrorism financing (CTF), fraud prevention, tax reporting, or other statutory duties.

Purpose and legal basis: The disclosure of personal data to public authorities is primarily based on TF Bank's obligation to comply with applicable laws and regulations (Article 6(1)(c) GDPR). In certain cases, disclosures may also be necessary to fulfil contractual obligations with customers or based on TF Bank's legitimate interest (Article 6(1)(f)) in protecting its operations, customers, and systems against fraud, misuse, or criminal activity.

In addition, TF Bank provides information to tax authorities and to credit reference agencies in accordance with applicable banking, credit reporting, and tax legislation.

6.4 Payment Service Providers and Financial Institutions

TF Bank may share personal data with payment service providers and financial institutions that facilitate electronic payments for you, Merchants, and TF Bank. These services include various payment methods such as credit cards, direct debit, and bank transfers.

Purpose and legal basis: Some Merchants use third-party payment service providers to process payments, and your data may be shared with them for this purpose. Additionally, TF Bank may share your data with financial institutions to complete transactions involving your account. These

disclosures are necessary to carry out payment transactions initiated by you and are based on the legal basis of fulfilling the agreement between you and TF Bank.

6.5 Fraud Prevention Agencies

TF Bank may share personal data with partner agencies that provide fraud prevention and monitoring services. These partners help TF Bank detect and prevent fraudulent behaviour, safeguard customers, and protect the integrity of financial transactions.

Purpose and legal basis: The sharing of personal data with these parties is necessary to identify and prevent fraud, misuse, and other criminal activity. This processing is based on TF Bank's legitimate interest (Article 6(1)(f) GDPR) in protecting its operations, customers, and financial systems against fraud and maintaining the security and reliability of its services.

6.6 Credit Agencies

If you apply for a service from TF Bank that involves the provision of credit, your personal data may be shared with credit reporting agencies.

Purpose and legal basis: Your data is shared with credit reporting to assess your creditworthiness, verify your identity and contact details, and help protect you and other customers from fraud. This exchange of information is required to fulfill TF Bank's legal obligations to conduct credit assessments.

In addition, TF Bank relies on its legitimate interest in ensuring responsible lending practices. Credit agencies hold important financial information that enables TF Bank to make informed credit decisions and avoid granting credit to individuals who may not be able to repay it. This processing is carefully assessed to ensure it is necessary and proportionate, and that your rights under data protection law are respected.

A list of the relevant credit agencies can be found here: [LINK](#).

6.7 Credit Registers

When you apply for a credit product or any service involving deferred payment, TF Bank must in some markets share personal data, including credit data, with national credit registers.

Purpose and legal basis: The sharing of personal data with credit registers is done to comply with mandatory reporting obligations under national credit register legislation. In some markets, financial institutions are legally required (Article 6(1)(c) GDPR) to report consumer credit information to ensure an accurate overview of total credit exposure and support responsible lending.

6.8 Debt Collection Agencies

TF Bank may share your personal data with debt collection agencies, when unpaid and overdue debts are outsourced or sold for collection.

Purpose and legal basis: This data sharing is necessary to recover outstanding debts. Debt collection agencies may process your personal data either on behalf of TF Bank as data processors or under their own responsibility in accordance with their own privacy notices.

The legal basis for this processing is TF Bank's legitimate interest in collecting or selling overdue debts.

6.9 Customers/Merchants

TF Bank shares personal data with the Merchants from whom you have made purchases, to manage payments, returns, complaints, and commission settlements.

Purpose and legal basis: The sharing of personal data is based on TF Bank's legitimate interest (Article 6(1)(f) GDPR) in administering customer and merchant relationships, ensuring correct handling of payments, returns, and complaints, and fulfilling commercial obligations such as commission and reconciliation. The processing is necessary for TF Bank to provide its services efficiently and maintain transparent and accurate cooperation with merchants. All sharing is strictly limited to what is necessary and conducted under appropriate contractual and security safeguards.

7 Profiling and Automated Decision-Making

7.1 Profiling in Connection with Personal Data Processing

When using certain digital services, your personal data may be subject to profiling. Profiling involves the automated analysis of information about your behavior, preferences, or financial situation to tailor services, content, or communication to your likely interests.

For example, profiling may be used to:

- Determine which marketing messages are most relevant to you,
- Optimize customer service interactions,
- Prioritize communication channels for reminders or payment notifications.

These processes may involve the use of machine learning models and other forms of artificial intelligence to improve accuracy and enhance your overall user experience. In some cases, your data may be compared with that of other users who exhibit similar behavior patterns to identify the most suitable offers, communication methods, or service features. TF Bank continuously tests and validates its profiling models to detect potential bias and ensure that all outcomes are fair, accurate, and non-discriminatory.

Even when profiling is used, TF Bank ensures that meaningful human oversight is maintained to monitor outcomes and prevent unfair or unintended effects.

You have the right to object to profiling for marketing purposes at any time. In some cases, you may also choose to discontinue specific services that involve profiling for personalization.

7.2 Automated Decisions with Significant Impact

In certain cases, decisions about you may be made entirely through automated processing. These decisions can have legal effects or otherwise significantly affect you, for example, by determining whether credit is granted or denied, assessing fraud risk, or verifying the legitimacy of a transaction.

Such decisions are based on an evaluation of:

- Information you provide,
- Data from credit reference agencies,
- Internal data from your previous interactions with TF Bank's services.

These assessments often involve profiling, where various factors are weighed using automated models, including machine learning, to form a comprehensive decision basis.

Automated decision-making is carried out only when it is necessary to evaluate your application and to enter into or perform a credit agreement with you, or when required by law (for example, for anti-money-laundering screening).

This processing is based on Article 6(1)(b) and Article 22(2)(a) of the GDPR, as it is required to determine whether we can provide you with credit under responsible lending standards. We do not rely on your consent for these decisions, as they form an essential part of our contractual relationship and regulatory obligations as a credit provider. Examples of automated decisions include:

- Creditworthiness assessments when applying for credit services,
- Identification of potential fraud risks,
- Verification of transaction legitimacy,
- Evaluation of risks related to money laundering or sanctions

To protect your rights and freedoms, TF Bank ensures that appropriate safeguards are in place. These safeguards include the right to human intervention, meaning you can request that a qualified person reviews any automated decision and takes your individual circumstances into account before a final outcome is confirmed. You always have the right to:

- Object to the decision,
- Request a manual review of the decision,
- Submit additional information that may influence the outcome.

TF Bank regularly reviews these automated decision-making models to ensure they are fair, accurate, and compliant with applicable laws. TF Bank also performs regular validation and fairness testing to detect potential bias and to ensure that automated decisions are made in a fair and non-discriminatory manner.

For more information or to exercise these rights, please contact us using the details provided in Section 12.

8 Transfers of Personal Data Outside the EU/EEA

TF Bank strives to process personal data within the EU/EEA whenever possible. However, in certain cases it might be necessary to transfer data to countries outside this area, for example, when shared with suppliers and subcontractors operating outside the EU/EEA.

TF Bank ensures that any such transfer takes place in compliance with the General Data Protection Regulation (GDPR) and that your personal data remains protected at an equivalent level, including respect for your rights as a data subject. Transfers are safeguarded through standard contractual clauses approved by the European Commission or other legally recognized mechanisms ensuring an adequate level of protection.

If you make a purchase from a Merchant located outside the EU/EEA, the transfer of your personal data to that Merchant may be necessary to complete the transaction. This means your data may be processed in a third country.

For more information about the safeguards applied in connection with such transfers, or to request a copy of the relevant protective measures, you are welcome to contact us using the details provided in Section 12. You can also learn more about adequate protection levels, standard contractual clauses, and binding corporate rules on the website of the Swedish Data Protection Authority (IMY).

8.1 Safeguards for Transfers to Third Countries

When personal data is transferred to countries outside the EU/EEA, TF Bank ensures that appropriate safeguards are in place in accordance with applicable data protection regulations. These safeguards may include:

- **Adequacy Decisions:** Transfers may be made to countries that the European Commission has determined offer an adequate level of data protection. In such cases, your rights remain fully protected.
- **Standard Contractual Clauses (SCCs):** TF Bank may enter into SCCs approved by the European Commission with the recipient of the data. These clauses require the recipient to apply the same level of protection as within the EU/EEA. Where necessary, TF Bank also assesses the legal environment of the recipient country and implements additional technical and organizational measures to mitigate any identified risks.
- **Binding Corporate Rules (BCRs)** adopted by some of our service providers, which ensure a consistent level of protection across their global operations.
- **EU-U.S. Data Privacy Framework:** For transfers to certified U.S. companies, TF Bank may rely on the Data Privacy Framework, under which participating organizations commit to specific privacy principles that ensure adequate protection of personal data.

If you have questions about third-country transfers or the safeguards applied, you are welcome to contact us. See Section 12 for contact details.

9 Cookies and web technologies & app techniques

To provide a personalized, secure, and seamless experience, TF Bank uses cookies and similar tracking technologies across our digital platforms, including our website, My Pages, mobile app, and checkout solutions with partner merchants. These technologies help us remember your preferences, improve our services, analyze user behavior, and present offers and content that are relevant to you. In each interface, you can find detailed information about the types of tracking used and how to consent to or refuse such tracking in accordance with applicable regulations.

Legal basis: Legitimate interest and consent (Articles 6.1(f) and 6.1(a) GDPR). The processing of your personal data through cookies and similar technologies is based on our legitimate interest in ensuring the functionality, security, and performance of our digital services, as well as your consent when required — for example, for analytics, personalization, or marketing purposes. We have carefully balanced our interests against your right to privacy and concluded that this processing is necessary to enhance your user experience and to maintain a high standard of service quality.

If you would like to know more about this assessment or wish to withdraw your consent or object to the processing, you are welcome to contact us. See contact details in Section 12.

Detailed information about the types of cookies and tracking technologies we use, their purposes, and how you can manage or decline them is available in each respective interface and in our Cookie Policy.

10 Your rights

10.1 Right to information

You have the right to obtain information about how TF Bank processes your personal data, and you can contact TF Bank if you want detailed information about the processing of your personal data. TF Bank may request that you be specific in that regard.

10.2 Right to withdraw consent

You have the right to withdraw your consent to the processing of personal data for marketing purposes, including both direct marketing and the use of tracking services, such as cookies.

10.3 Right to access

You have the right to request access to your personal data processed by TF Bank, unless TF Bank has a right or legal obligation not to share the personal data or if the data can be not disclosed in a secure manner.

10.4 Right to data portability

You have the right to request a copy of the personal data concerning you that TF Bank holds for the performance of a contract with you, or based on your consent, in a machine-readable format. This allows you to use this data elsewhere, for example to transfer your personal data to another data controller/recipient.

10.5 Right to rectification and deletion

You have the right to rectification or deletion of your personal data if certain requirements are met and if TF Bank can no longer demonstrate a legal basis for the processing, taking into account the provisions of Section 4 of this privacy notice.

10.6 Right to restrict processing

Subject to the statutory requirements, the fulfilment of which must be assessed on a case-by-case basis, the right to restrict processing includes your right to request restriction of data processing.

10.7 Right to file a complaint

You have the right to submit a complaint related to data processing directly to TF Bank, see contact details under Section 2. If you are dissatisfied with the response from TF Bank, you have the right to submit a complaint to the relevant supervisory authority, see contact details under Section 11.

10.8 Right to object

You have the right to object to processing of your personal data based on legitimate interests, unless the legitimate interest outweighs your fundamental rights and freedoms. You also have the right to object to processing for marketing or profiling purposes. If you wish TF Bank to stop sending promotional communications to your email address, you can send us an e-mail or unsubscribe from receiving them by following the instructions under “Unsubscribe” at the end of each communication.

11 Contact to the supervisory authority

Swedish Data Protection Authority:
Box 8114, 104 20 Stockholm, Sweden

12 Contact details

We always strive to handle your personal data with the utmost care and in accordance with high standards. If you have any questions, concerns or comments about how we handle your personal data, you are welcome to contact us. Please find e-mail addresses for all markets we operate in.

Legal Name	Country	Privacy e-mail
Avarda Sweden	Sweden	privacy@avarda.se
Avarda Finland	Finland	privacy@avarda.fi
Avarda Germany	Germany	privacy@avarda.de
Avarda Denmark	Denmark	privacy@avarda.dk
Avarda Norway	Norway	privacy@avarda.no
TF Bank Sweden	Sweden	privacy@tfbank.se
TF Bank Norway	Norway	privacy@tfbank.no
TF Bank Finland	Finland	privacy@tfbank.fi
TF Bank Estonia	Estonia	privacy@tfbank.ee
TF Bank Latvia	Latvia	privacy@tfbank.lv
TF Bank Lithuania	Lithuania	privacy@tfbank.lt
TF Bank Poland	Poland	privacy@tfbank.pl
TF Bank Germany	Germany	privacy@tfbank.de
TF Bank Austria	Austria	privacy@tfbank.at
TF Bank Spain	Spain	privacy@tfbank.es
TF Bank Italy	Italy	privacy@tfbank.it
TF Bank UK	UK	privacy@tfbank.uk
TF Bank Netherlands	Netherlands	privacy@tfbank.nl
TF Bank Ireland	Ireland	privacy@tfbank.ie

We will be happy to help you!

TF Bank has appointed a Data Protection Officer (DPO) who is responsible for monitoring compliance with applicable data protection legislation. You can contact our Data Protection Officer by sending an email to dpo@avarda.com by writing to us at:

Attn: Data Protection Officer
 Avarda Bank AB (publ)
 Box 947
 501 10 Borås, Sweden

If, after contacting us, you remain dissatisfied with how we process your personal data, you have the right to lodge a complaint with the relevant supervisory authority. In Sweden, this is the Swedish Data Protection Authority (Integritetsskyddsmyndigheten, IMY), which is responsible

for ensuring that personal data is processed lawfully and in accordance with applicable regulations. You can find contact details to the IMY in Section 11 above.

We value your feedback and view it as an opportunity to improve our services and data protection practices

13 Other language versions

The original version of this privacy notice is written in Swedish. You can find translations of the privacy notice in local languages on our local websites. You can also always ask us for the language version you prefer.

14 Changes to the Privacy Notice

This privacy notice is reviewed regularly to ensure it remains accurate and up to date. Any changes will be communicated by publishing the updated version on our website.

Date	Change
April 2026	Version 4
November 2025	Version 3
June 2023	Version 2
May 2018	Version 1