



## PRIVACY POLICY FOR THE UNITED BANKERS GROUP COMPANY'S CLIENT REGISTER

### 1 Data Controller

The data controller is the United Bankers group company with which a person (hereinafter, the "data subject") currently has or has previously had a client relationship and to which the data subject has granted their consent for the collection and processing of personal data or that based on valid legislation is obligated to process the data subject's personal data or whose legitimate interests require the processing of the data subject's personal data, for instance because the data subject is in a client relationship with the relevant data controller company.

United Bankers group companies that process personal data for the purposes of the client register, include the following:

- UB Asset Management Ltd
- UB Asset Management Tampere Ltd
- UB Securities Ltd
- UB Fund Management Company Ltd
- UB Corporate Finance Ltd
- UB Nordic Forest Management Ltd
- UB Brokerage Company Ltd
- UB Life Ltd
- UB Finance Ltd
- UB Meklarit Oy

Each of which is individually a data controller.

### 2 Data Controller's Contact Person

Data security matters are managed on behalf of the data controller by the parent company of the United Bankers group, United Bankers Plc.

The contact person in matters concerning the register is:

Sofia Stenius-Linna, Head of Compliance

United Bankers Plc

Aleksanterinkatu 21 A,

00100 Helsinki, Finland

[compliance@unitedbankers.fi](mailto:compliance@unitedbankers.fi)

Tel. 09 2538 0357

### 3 Data Protection Officer's Contact Details

Sofia Stenius-Linna  
Head of Compliance  
compliance@unitedbankers.fi  
Tel. 09 2538 0357

### 4 Name of Register

The United Bankers Group Company's Client Register

### 5 Purpose of Data Processing

Personal data are processed for purposes pertaining to the management, administration and development of the client relationship, sale and provision of services as well as to service development, invoicing and debt collection. Personal data are also processed for purposes required for dealing with any exceptional situations, complaints and other claims, as well as for testing the system. Personal data are processed in communications directed at clients, such as for informational and reporting purposes, marketing as well as in communications regarding exceptional situations. Personal data are also processed in connection with client satisfaction surveys. In addition, personal data are processed to detect, prevent and investigate fraud and other criminal action, claims and liabilities as well as for the purposes of auditing, authority and client reporting. Furthermore, personal data are processed in order to fulfil the statutory obligations pertaining to other group companies.

Profiling refers to the automated processing of personal data. We utilise profiling, for instance, for the purposes of the targeted provision of products and services.

In addition, UB Finance Ltd applies automated decision-making in its services. Automated decision-making entails utilising systems so that decisions can be made based on the information that the client has provided. UB Finance Ltd applies automated decision-making, for instance, in granting loans and in preventing malfeasances. With the aid of automated decision-making, UB Finance Ltd strives to ensure that decisions are rapid, fair, effective and correct.

### 6 Legal Basis for the Processing of Personal Data

Personal data are processed on the following legal bases:

- (a) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- (b) Processing is based upon the unequivocal consent of the data subject, retractable by the data subject at any time.
- (c) Processing is necessary for compliance with a legal obligation to which the data controller is subject (for instance, pursuant to the Act on Preventing Money Laundering and Terrorist Financing, Act on Taxation Procedure, Act on Payment Services or Personal Data Act).
- (d) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, including processing for the purposes of general administration and development of the client relationship as well as the marketing of our services. Such purposes of processing may include, for instance, actions related to marketing or when there is a need to transfer personal data within the corporate group for administrative reasons.
- (e) The social security number is processed in order to carry out a statutory task (e.g. in order to identify the client in accordance with the Act on Preventing Money Laundering and Terrorist Financing (444/2017)).

## 7 Data Content of the Register (Categories of Personal Data to be Processed)

The register contains, *inter alia*, the following personal data concerning the data subjects:

Information collected from the data subjects themselves for the purposes of managing the client relationship, such as

- Basic client identification details, such as their name, date of birth, social security number, marital status, education, profession, taxation country, tax identifier, details of the document used for identification, domicile, nationality
- Contact details such as address, email address, telephone numbers
- Financial information, such as information concerning the financial status and wealth of the client
- Information pertaining to the management of the client relationship, such as the details of the client's representative, service agreements and terms thereof, direct marketing prohibition and permission, reports, client communications, telephone recordings, bank account information
- Information required by the statutory obligations, for instance information required under the Act on Preventing Money Laundering and Terrorist Financing and the Act on Investment Services

Furthermore, other information may also be collected for the purposes of managing the client relationship, such as, for instance, information about the client's objects of interest.

If the client has taken into use the OmaUB online services, the following personal data, connected to the data subject's social security number, are processed in the service:

- Subscriptions, redemptions, swaps, authorisations
- Online payment transactions
- Communications via OmaUB
- Latest log-in (time/ip address)

The provision of certain personal data is a requirement for the conclusion of an agreement, without which the data controller is not able to provide services to the data subject.

## Personal Data Collected from Third Parties

As a point of departure, personal data in the client register is collected from the data subjects themselves or from their trustees, and in practice the collection of personal data occurs in connection with the creation of the customership, registration into the service, utilisation of the service and customer service. In addition to such data, information may also be obtained from public and private sources, such as authority registers (for instance the population register and trade register) and from national and international sanctions lists (FATF, National Bureau of Investigation, EU, UN and OFAC), from credit information services providers and enforcement authorities. Information collected from public sources may constitute clients' identification or contact information, or information required under legislative obligations.

## 8 Personal Data Retention Periods

We retain the personal data of data subjects collected for the purposes of managing the client relationship for the duration of the client relationship. Upon the cessation of the client relationship, we retain certain information owing to legislation, in accordance with the retention period required or permitted by the legislation.

For instance, documents related to the management of the client relationship are retained for ten (10) years after the cessation of the client relationship. Client correspondence (telephone conversations with the client and electronic messages between UB and the client) are retained for a minimum of five (5) years, but may, upon the request of the supervisory authority, be retained for seven (7) years of the recording of same. Material related to accounting is retained for six (6) or ten (10) years, including the current year, as provided for under the Accounting Act (1336/1997).

## 9 Recipients of Personal Data (Categories of Recipients) and Regular Disclosures of Personal Data

The data controller transfers or discloses personal data to other parties when compliance with an agreement or the provision of the service requires the transfer of information. Parties to which information may be disclosed include, for instance, UB group companies and external business and co-operation partners. In addition, information is disclosed to the authorities in accordance with statutory obligations.

When a co-operation partner or service provider is carrying out an agreed task that requires the processing of personal data on behalf of the data controller, the liability of the processor and the purpose of the processing is defined contractually in writing. Such contracts may be concluded, for instance, in order to outsource an IT services provider.

## 10 Transfers of Personal Data Outside of the EU or EEA

As a main rule, the data controller shall not transfer information outside of the EU or EEA (to a "third country"). In case personal data is exceptionally transferred to a third country, this is only done if we are able to ascertain that the data subject's information has been protected at the level required by the General Data Protection Regulation, or if the data subject grants their express consent to same.

## 11 Principles of Personal Data Protection

Information concerning the clients has been protected as follows:

The data controller has agreed upon the protection of the register with the system suppliers.

The right to access the databases and systems and to utilise the register has only been granted to employees of the data controller or of the subcontractors acting on its behalf and on its account who by virtue of their assignment are entitled to process the information contained in the register. Only employees who by virtue of their work tasks have the right to process personal data are entitled to use the system containing personal data.

Access to the information contained in the register is only allowed to designated persons authorised to do so owing to their work tasks. The confidentiality, integrity and availability of the personal data contained in the register is protected with appropriate technical and organisational measures. Such measures include, *inter alia*, passwords and other access right management, access control and physical safeguards as well as firewalls.

## 12 Rights of the Data Subject

The data subject shall have the following rights defined under the EU General Data Protection Regulation:

- a) The right to obtain confirmation from the data controller of whether personal data concerning the data subject are being processed or not, and if such personal data are being processed, the right to gain access to the personal data and to certain data determined under the EU General Data Protection Regulation.
- b) The right to object to the processing of personal data for certain purposes defined under the EU General Data Protection Regulation, such as for direct marketing.
- c) The right to withdraw their consent at any time without this impacting the lawfulness of the processing conducted on the basis of such consent prior to the withdrawal of same.
- d) The right to require the data controller to rectify without any undue delay any inaccurate or erroneous personal data concerning the data subject, as well as the right to have incomplete personal data supplemented.
- e) The right to require the data controller to erase the personal data concerning the data subject without any undue delay in situations defined under the EU General Data Protection Regulation.
- f) The right to require the data controller to restrict processing under the situations defined under the EU General Data Protection Regulation.
- g) The right to obtain, under certain situations defined under the EU General Data Protection Regulation, the personal data concerning the data subject that the data subject has provided to the data controller, in a structured, generally used and machine-readable form, as well as

the right to transfer such data to another data controller without hindrance from the data controller to which the personal data were originally provided.

- h) The right to lodge a complaint with the supervisory authority, if the data subject considers that the processing of their personal data occurs in violation of the EU General Data Protection Regulation. The data subject may lodge a complaint especially in the member state of their permanent place of residence or employment, or in which the alleged breach of the General Data Protection Regulation has occurred.

Requests regarding the exercise of the data subject's rights shall be addressed to the data controller's contact person mentioned under Clause 2.

### **13 Cookies**

The United Bankers Group utilises the so-called cookie functionality on its website. A cookie is a small text file sent to the user's computer and stored there, helping the host of a website to identify visitors visiting the website frequently, facilitating the logging-in of the visitors to the website and enabling the compilation of aggregate data of the visitors. Cookies do not harm the users' computers or their files. More information about cookies on the [unitedbankers.fi](http://unitedbankers.fi) -website »

In case a user visiting the website of the United Bankers Group does not want United Bankers Group to obtain the aforementioned information with the aid of cookies, the user may deactivate the cookie functionality. The service user should note that some cookies may be necessary for the proper functioning of the website maintained by the United Bankers Group and the services provided by same.

### **14 Amendments**

The data controller may make amendments to this privacy policy by announcing the amendments on the website.