

# Nordea

## Privacy Policy for Employees at Nordea

Nordea is fully committed to protecting your individual rights and keeping your personal data safe. In this Privacy Policy we describe the collection, usage, storage and sharing practices of personal data. Within the Nordea Group, the data controller will be Nordea Bank Abp and/or the Nordea company that you are employed by.

We process employees' personal data for a number of reasons. When we write «you», we mean you as an employee-

This Privacy Policy covers the following areas:

- 1 What personal data we collect
- 2 How we may use your personal data and the lawful basis for doing so
- 3 Automated decision-making
- 4 Whom we may disclose your personal data to
- 5 How we protect your personal data
- 6 Your privacy rights
- 7 How long we keep your personal data
- 8 How changes to this Privacy Policy will be made
- 9 Contacting us or the data protection authority

### 1 What personal data we collect

Personal data is collected directly from you, from other employees like your manager or Group People representative or generated by you when you are using office tools and work equipment like your computer and various IT applications. Sometimes additional information is collected to verify or to keep your personal data up to date, for example by checking official address records.

**The personal data we collect can be grouped into the following categories:**

- **Identity and background information:** for example national identification number, name, phone numbers as well as e-mail, postal and/or residential address.
- **Employment data:** for example type of employment agreement, job position, role description.
- **Recruitment data:** for example CV and application, interview and assessment data.
- **Remuneration and benefit information:** for example salary, payroll information, bank account details, tax information.
- **Information related to legal requirements:** for example country of taxation, work environment, holidays, sick leave and rehabilitation-related information.
- **Human capital information:** for example attended trainings, certifications, performance and learning dialogues, development needs and disciplinary actions.

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- **Monitoring data:** for example system logs, call recordings, chat recordings, screen recordings, building access records, internet usage logs.
- **Special categories of personal data:** for example information concerning health or trade union membership.

## **Personal data we may collect from you:**

We collect information you provide directly to us. For example, when you enter into an employment contract, we collect identification information, contact information as well as remuneration and benefit information. Nordea also collects information which you provide us with as you perform your ongoing duties under the employment contract, for example when you use Nordea's IT applications or record working time and travel expenses and handle invoices. For some job positions where calls and chat conversations with customers must be recorded, such recordings also include your personal data when you are part of that conversation. For regulatory and customer relationship improvement purposes, both internal and external calls are being recorded for job descriptions in scope for recording. This means that if you participate in a call, online meeting or Skype chat conversation with an employee that has recording activated, your voice conversations, chat messages and content shared will also be recorded as part of the conversation. For security purposes, we have cameras in some areas of our offices. Nordea will also collect personal information when you choose to make use of benefits and services that are available to you as an employee.

## **Personal data that we may collect from third parties:**

- Publicly available and other external sources (such as address registers and registers held by tax authorities) can be used to for example update your home address information or tax deduction from salary.
- From other entities of the Nordea Group or other entities with which we collaborate we may collect information such as which licences you may have if required to perform special tasks like providing financial advice to customers.
- If you choose to receive feedback from colleagues within the Performance and Learning Dialogue, such feedback is collected in accordance with that process.

## **2 How we may use your personal data and the lawful basis for doing so**

We use your personal data for employment administration purposes, to comply with legal obligations as well as for workforce planning.

### **Performance of a contract**

The main purpose of our processing of your personal data is to fulfil our responsibilities under the employment contract and enable you to perform your duties.

Examples of performance of a contract:

- processes needed to recruit and onboard the candidate/employee and to provide access to the IT applications needed to perform your tasks

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- processes needed for paying and reviewing salary, holidays, pension administration, travel expenses and evaluating your performance
- processes for managing employee inquiries to People and for providing services to employees.

## **Legal obligation**

In addition to performance of a contract, we also process your personal data to fulfil our obligations under law and collective agreement other regulations or authority decisions.

Examples of processing due to legal obligations:

- reporting to tax authorities and supervisory authorities
- sick leave and rehabilitation administration
- fulfilling trade union obligations
- demonstrating compliance with laws and regulations, for example by keeping an insider register.

## **Legitimate interest**

Processing based on a legitimate interest includes workforce planning and analysis including remuneration and compensation policies and analysis, performance reviews and competence development, as well as internal information sharing.

Nordea will also monitor the use of IT equipment, applications, information and network traffic. This includes monitoring the use of Internet, e-mail and other communication tools as well as to scan and discover content of stored files on shared and personal storage facilities like SharePoint and hard drives for the purpose of detecting and preventing virus-, malware- or similar threats, as well as to ensure that IT-equipment, applications and information is used in line with legislation and internal instructions. The monitoring will also enable Nordea to automatically inform users or take other appropriate action when information handling is at risk of being non-compliant. More information is available in the Group People data privacy guideline.

To the extent allowed by local legislation, Nordea may also

- access and read work related e-mail, stored files and other electronic communications (like Skype messages) if needed due to urgent business needs, e.g. when an employee is on vacation, sick or otherwise unavailable or when needed to respond to complaints and inquiries from authorities.
- access and read private e-mail, other electronic communication and stored files in Nordea's IT equipment when there is a suspicion of illegal activity or severe disloyalty.

More information is available in the Group People data privacy guideline

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Based on legitimate interest Nordea may also process and share employee data in Nordea Group applications and also process employee data in other digital work tools, that are used for customer interactions between Nordea employees and customers.

The purpose for this type of processing is to maintain and to improve customer relationships. The data subjects in question are Nordea employees who have a customer-facing role where maintenance of the customer relationship is an integral part of that role. Customers' access to employee data in the application is limited to the employee responsible for the customer. The employee data being processed includes, but is not limited to, name, email, phone number, job description, and photo. Further, Nordea may process employee data from Nordea Group applications and other digital work tools to improve customer relationships.

## **Consent**

There may be situations when we will ask for your consent to process your personal data, for example to use your profile picture in People Book or in other applications. If we ask for your consent, more information about that specific processing activity will be given in the request for consent. You can always withdraw your consent. Employee consent is only used to provide services that you may want to use, but are not in any way required or expected to use.

## **3 Automated decision-making**

We are currently not using automated decision-making for employees. In situations where automated decision-making will be used, we will provide you with further information about the logic involved as well as the significance and the envisaged consequences for you.

If automated decision-making is used, you can always request a manual decision-making process instead, express your opinion or contest the decision based solely on automated processing, including profiling, if such a decision would produce legal effects or otherwise similarly significantly affect you.

## **4 Whom we may disclose your personal data to**

We share your personal data with others such as authorities, Nordea Group companies, suppliers, trade unions, pension administration entities and business partners.

### **Third parties and Nordea Group companies**

We disclose personal data to authorities and trade unions to the extent we are under obligation to do so. Such authorities include tax authorities and supervisory authorities in relevant countries.

We may also disclose personal data to insurance companies and service companies that provide occupational pensions and benefits.

In addition, we may disclose your personal remuneration and compensation data to companies that perform remuneration and compensation policy analysis for Nordea.

We have entered into agreements with selected suppliers, which include the processing of personal data on behalf of us. Examples thereof are suppliers of payroll, benefit, travel, invoicing and training

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services, remuneration and compensation policy analysis, IT services as well as industry wide-surveys for statistical purposes

Examples of recipients of employee personal data include:

Zalaris ASA, PO Box 1053 Hoff, 0218 Oslo, Norway  
Benify AB, Box 24101, 104 51 Stockholm, Sweden

## Third country transfers

In some cases, we may also transfer personal data to organisations in so-called third countries (countries outside of the European Economic Area). Such transfers can be made if any of the following conditions apply:

- the EU Commission has decided that there is an adequate level of protection in the country in question, or
- other appropriate safeguards have been taken, for example the use of the standard contractual clauses (EU model clauses) approved by the EU Commission or the data processor has valid Binding Corporate Rules (BCR) in place, or
- that there are exceptions in special situations, such as to fulfil a contract with you or your consent to the specific transfer.

You can access a copy of the relevant EU model clauses used by Nordea for transfers by going to [www.eur-lex.europa.eu](http://www.eur-lex.europa.eu) and searching for 32010D0087.

## 5 How we protect your personal data

Keeping your personal data safe and secure is at the centre of how we do business. We use appropriate technical, organisational and administrative security measures to protect any information we hold from loss, misuse and unauthorised access, disclosure, alteration and destruction.

## 6 Your privacy rights

You as a data subject have rights in respect of personal data we hold about you. You have the following rights:

- a) Request access to your personal data. You have a right to access the personal data we are keeping about you. In many cases this information is already available to you in your online services from us. Your right to access may, however, be restricted by legislation, protection of other persons' privacy and consideration for the Nordea Group's business concept and business practices. The Nordea Group's know-how, business secrets as well as internal assessments and material may restrict your right of access.
- b) Request correction of incorrect or incomplete data. If the data is incorrect or incomplete, you are entitled to have the data rectified, with the restrictions that follow from legislation.
- c) Request erasure. You have the right to request erasure of your data in case:
  - you withdraw your consent to the processing and there is no other legitimate reason for processing

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- you object to the processing and there is no justified reason for continuing the processing
  - you object to processing for direct marketing
  - processing is unlawful.
- d) Limitation of processing of personal data. If you contest the correctness of the data which we have registered about you or the lawfulness of processing, or if you have objected to the processing of the data in accordance with your right to object, you may request us to restrict the processing of the data to storage only. The processing will only be restricted to storage, until the correctness of the data can be established, or it can be checked whether our legitimate interests override your interests.

If you are not entitled to erasure of the data which we have registered about you, you may instead request that we restrict the processing of the data to storage only. If the processing of the data which we have registered about you is solely necessary to assert a legal claim, you may also demand that other processing of the data be restricted to storage. We may process your data for other purposes if this is necessary to assert a legal claim or if you have granted your consent to this.

- e) Object to processing based on our legitimate interest. You can always object to the processing of personal data about you for direct marketing and profiling in connection with such marketing.
- f) Data portability. You have a right to receive personal data that you have provided to us in a machine-readable format. This right applies to personal data processed by automated means only and on the lawful basis of consent or performance of a contract. Where secure and technically feasible the data can also be transmitted to another data controller by us.

Your request to exercise your rights as listed above will be assessed given the circumstances in the individual case. Please note that we may also retain and use your information as necessary to comply with legal obligations, resolve disputes and enforce our agreements.

## **7 How long we keep your personal data**

We will keep your data for as long as it is needed for the purposes for which your data was collected and processed or required by laws and regulations.

This means that we keep your data for as long as necessary for the performance of a contract and as required by retention requirements in laws and regulations. Where we keep your data for other purposes than those of the performance of a contract, such as for bookkeeping and regulatory requirements, we keep the data only if necessary and/or mandated by laws and regulations for the respective purpose.

The data retention obligations will differ within the Nordea Group subject to local law.

Specific examples are:

- Bookkeeping regulations: up to ten years.
- Remuneration requirements: up to ten years after salary or other remuneration paid.

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- Competence requirements for persons in positions providing information or advice on financial instruments: minimum five years after end of position.
- Pension administration: as long as the person or beneficiaries are alive or are collecting compensation.
- Recruitment-related documents: application and other related documents for up to two years.

The above is only for explanatory purposes and the retention times may differ from country to country.

## **8 How changes to this Privacy Policy will be made**

We are constantly working on improving and developing our services and ways of working, so we may change this Privacy Policy from time to time. We will not diminish your rights under this Privacy Policy or under applicable data protection laws in the jurisdictions we operate in. If the changes are significant, we will provide a more prominent notice, when we are required to do so by applicable law. Please review this Privacy Policy from time to time to stay updated on any changes.

## **9 Contacting us or the data protection authority**

If you have any questions or concerns regarding our Privacy Policy, you can always contact People Direct in Group People. Also, the Nordea Group has appointed a Data Protection Officer that you can contact by sending a message to: [dataprotectionoffice@nordea.com](mailto:dataprotectionoffice@nordea.com) or by sending a letter to: Nordea, Group Data Protection Office, Satamaradankatu 5 00020, Nordea

You can also lodge a complaint or contact the data protection authority in the country where you reside, are employed or in which the infringement has occurred.