

## Request access to your personal data – for employees or former employees

If you are employed or have been working for Nordea (or in case you are or have been a consultant at Nordea) you can request your employment related personal data directly from Group People.

For employees in the Nordic countries we refer to the instruction on our internal Intranet pages of how to request personal data related to your employment.

For employees outside the Nordic countries please direct your request of personal data related to your employment via email to [people.direct@nordea.com](mailto:people.direct@nordea.com) or call People Direct at +45 5547 5600.

## 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, a consultant or a person in another similar capacity performing duties while employed with Nordea.

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, 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.
- **Monitoring data:** for example system logs, call 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 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 licenses 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.

### **Entering into and administration of employment contract (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
- 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.

### **Fulfilment of requirements and obligations for us stated in laws, regulations or decisions from authorities and supervisors (legal obligation)**

In addition to performance of a contract, we also process your personal data to fulfil our obligations under law, 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.

### **Workforce planning and analysis (legitimate interest)**

Processing for the purpose of legitimate interests includes workforce analysis as well as internal information sharing. Nordea will also monitor the use of office equipment, IT applications and the use of the internet and e-mail to prevent virus or malware attacks as well as to ensure that such equipment is used in line with internal policies, such as our information security policy.

We have a legitimate interest to analyse our workforce to optimise our business processes. We also have a legitimate interest to monitor and scan the use of Nordea's IT equipment, IT applications and network to detect misuse and to protect Nordea from malware, viruses and similar threats.

### **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.

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 services as well as IT services.

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
  - 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.
- 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, test results for one year.

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, Strandgade 3, PO Box 0850, 0900 Copenhagen, Denmark.

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.