

Data privacy policy

1 About Stabelo

Stabelo is a provider and servicer of mortgage loans to Swedish private persons secured on Swedish homes. Stabelo's activities include issuing new mortgage loans and maintaining those mortgage loans over time, including administering interest payments, managing any changes in loan conditions, and handling loan repayments, until a mortgage loan is eventually repaid. Stabelo handles your personal information, from the time you apply for a loan with Stabelo and throughout the time you have a mortgage loan with us. This Data Privacy Policy explains the way we handle your personal information and informs you of the rights that you have regarding your personal information. Our concern is to ensure that your personal information is handled at all times with due care and respect for its confidentiality and sensitivity.

Stabelo operates as a group of companies, comprising a parent company Stabelo Group AB¹, a loan origination and servicing company Stabelo AB², and a mortgage fund management company Stabelo Asset Management AB³, as well as fund companies under the direct management of Stabelo Asset Management AB. All companies of the Stabelo group are registered in Sweden. Stabelo also works with a number of external service- and system-providers ('third-party suppliers') in order to offer customers an effective product and customer experience.

Under data privacy regulation, known as the General Data Protection Regulation in Sweden and the European Union (GDPR, or in Swedish *Dataskyddsförordningen*), the Stabelo group of companies are, acting together, the joint controllers for the

¹ Stabelo Group AB, Stabelo group parent company, organisation number 559030-7996

² Stabelo AB, loan origination and servicing company, organisation number 559064-2376, licensed by Swedish Finansinspektionen as a housing credit institute (*bostadskreditinstitut*)

³ Stabelo Asset Management AB, fund management company, organisation number 559075-0203, licensed by Swedish Finansinspektionen as an alternative investment fund manager (*förvaltare av alternativa investeringsfonder*)

protection and handling of your personal information. Your point of contact regarding GDPR and your personal information is the Stabelo Group Data Protection Officer (see Section 10, How to contact us).

Stabelo offers its mortgage loans to Swedish private customers via our distributors, under established business relations. When you apply for a Stabelo mortgage loan via one of our distributors, for example through its website, mobile applications or other digital means, the distributor shares your personal information with us. The safeguarding and confidentiality of your personal information is important to us.

2 About this Privacy Policy

In this Privacy Policy, we explain how we are processing your personal information, what types of information we collect and the purpose and the legal basis for these processing activities. We also explain when and why your personal information is disclosed to distributors and third-party suppliers.

We also inform you of your rights in this Privacy Policy relating to our processing of your personal information and any transfer we may make of your personal information.

This Privacy Policy applies to our collection, use and processing of your personal data. We collect, use and process your personal information when you use or apply for our service. This includes when you apply for or maintain a mortgage loan with Stabelo and communicate with us by phone, email, social media or the like, either directly with us or through one of our distributors.

Stabelo is the “controller” concerning the processing of your personal information under this Privacy Policy. This means that Stabelo is responsible for defining the purposes and ways in which your personal information is used, including processing by our operating partners when you use, or apply to use, our services. It is also Stabelo’s task to see that our own and operating partners’ handling of your personal information is done in accordance with applicable data protection regulation. Contact information for Stabelo’s Data Protection Officer can be found at the end of this Policy.

3 Stabelo's processing of your personal information

3.1 Introduction

This Privacy Policy explains how we collect, use and disclose your personal information when you use our service and otherwise interact with us. It also describes our data processing activities, their purpose, what category of personal information these activities involve and the legal basis for these processing activities.

3.2 Applying for and maintaining a residential mortgage with Stabelo

When you apply for a residential mortgage loan with Stabelo, via Stabelo's website or through one of our distributors, you will be asked to provide information such as your name, phone number, email address, Swedish personal identification number and other information relevant for the handling of your credit application. Examples of such other information are your home address, details concerning the security for the loan, family situation, work situation, other loans that you may have and your economic situation. Depending on your specific application details, additional information might be requested, such as background information on the value of your home, employer's certificate or pension basis. In addition to information about you, extensive personal information may be required also for your co-borrowers.

Stabelo is required by law to collect enough information for us to know our customers, including as part of government regulations on the prevention of money laundering and financing of terrorism.

When you choose to proceed with your mortgage loan application with us, we process the personal information we have collected on you and on related borrowers. The information is used to minimise the risks associated with lending as well as to ensure that the loan is given responsibly and consistently with good credit practices.

We may contact you regarding your application, e.g. for additional information, or to notify you if your application for a mortgage loan is denied.

In order to process your credit application and maintain your mortgage, in some cases Stabelo uses services provided by third party suppliers. Examples of third-party suppliers are Swedish Upplysningscentralen (UC) and Kreditz AB, from which customers' credit information and transaction data are obtained. When this happens, we share your personal information with the third-party supplier as needed. The purpose of such information collection and personal information sharing is to carry out lending effectively, with controlled risk and in accordance with good credit practice.

To be granted a mortgage loan with Stabelo we will need your bank account details. This is because interest payments and loan repayments are drawn from your account by so-called autogyro. Account information and personal information such as your name, address and email will be shared with Stabelo's payment agent in order to administer the withdrawal of interest payments and loan repayments from your bank account.

After your mortgage loan has been issued, we save and store information about you and your co-borrowers and about the related loan in order to administer the loan and manage the risks in our loans to customers. Stabelo uses the support of third-party service providers when managing loans, so your personal information will be shared with them. Examples of occasions when third-party service providers will handle personal information is when a loan is rescheduled or resolved.

If agreed interest payments are not met, we will contact you with reminders of your payment. If a mortgage loan enters default according to the lending terms and conditions, we may provide your personal and mortgage loan details to a collection agent.

In order to be compliant with regulations, we may be required to share your personal information with governmental authorities. In such cases, for example, the shared information may include your name, address, Swedish personal number, and details of your loan and transactions.

The information which you have provided for the purposes of applying for and maintaining your mortgage loan will be stored for a period up to 18 months following your application or up to 10 years following the end of the term of your mortgage loan,

whichever is longer. In the event that your mortgage loan is rejected, you have the right to request that your personal information is deleted by us (“the right to be forgotten”). We will return no later than one month after we receive the request for deletion. However, it is important to know that the right to have information deleted is not absolute. Name, social security number and information concerning your application can be stored in order to prevent our products and services from being misused. We do this based on our legitimate interest in counteracting and preventing fraud.

The legal basis for handling of personal information in this section are, unless stated otherwise above, the terms that customers agree to when applying for a loan with Stabelo, primarily through our distributor’s website or mobile applications, as well as Stabelo’s right and obligation to conduct credit lending in accordance with our business interests as well as current regulations.

3.3 Personalising your user experience

Stabelo’s ambition is that your customer experience should be tailored to your needs and wishes. In order to do this, Stabelo may collect and process information on how customers use our, and our cooperation partners’, digital services (web, email, mobile applications, etc.). It can also happen that such data is analysed along with other information about the customer in order to understand what information should be presented to the customer, in which format, by which channel, and with what frequency etc.

When you apply for a mortgage loan, we may process the personal information we have for you in order to pre-fill information in the application form. Such data may be available from third-party suppliers or other information providers and obtained based on your personal identification number. The purpose of this is to simplify and streamline the application process for you and save your time and effort.

The legal basis for handling of personal information in this section are the terms that customers agree to when applying for a loan with Stabelo, primarily through our distributor’s website or mobile applications, as well as Stabelo’s right and obligation to conduct credit lending in accordance with our business interests as well as current regulations.

3.4 Customer support

Stabelo offers different types of customer support in order to make it easier for you to request and use our services. We co-operate with our partners, including our distributors and third-party service providers, in order to deliver the best possible service. In order to ensure that Stabelo, together with its cooperation partners, delivers good customer service, your customer information is processed, for example for identification purposes. Customers can contact Stabelo via our website, phone, email, letter or, as appropriate, via social media and get help with questions and feedback regarding Stabelo's services. Depending on the nature of your request, you may be asked to provide us with additional personal information in order that Stabelo can provide you with secure and effective customer support.

For quality control purposes, your communication with Stabelo may be stored and reviewed. For example, customer support calls may be recorded. In connection with such documentation, your personal information such as name, contact details, Swedish personal number etc may be saved and processed.

In order to maintain a good level of service, Stabelo together with its cooperation partners may carry out testing of websites and mobile applications etc when errors occur or when system changes are implemented. Such tests may include processing of your personal information and are intended to secure the functioning of our systems, as well as to ensure that changes to customer data made either by you or Stabelo are presented in a relevant manner.

Stabelo produces reports and statistics by analysing the personal information that you have shared, such as your name, personal identification number and contact details. The purpose of such reports and statistics is to give you a better customer experience in your future interaction with Stabelo.

If we detect irregularities in customer payments or similar, we may be required to take necessary steps. These may involve further processing of personal information.

The information you have provided in connection with our customer service will be stored for the same time periods as for the information relating to your mortgage loan application and maintenance.

The legal basis for handling of personal information in this section are the terms that customers agree to when applying for a loan with Stabelo, primarily through our distributor's website or mobile applications, as well as Stabelo's right and obligation to conduct credit lending in accordance with our business interests as well as current regulations.

3.5 Marketing analysis and advertising

In order to help you make the most of the products and services provided by us and our distributors, we may make you aware of various products and services, via email, phone, website or mobile applications, with regard to those other products and services. In order to provide you with relevant offers, your personal information may be processed. Examples of such information are historical loan applications, credit information and income data.

Similarly, we may remind customers of unfinished applications as well as offering easy access to partially completed application forms. To this end, your personal information such as your name and Swedish personal number as well as your data in partially completed forms may be saved and processed.

Stabelo strives to be as relevant as possible for each customer in each digital channel. When you visit our website, or the website or mobile applications of our distributors, website tracking including cookies and similar technologies is used as described in section 5 of this policy. With your permission for statistics and marketing tracking, website tracking features can be used by us for marketing analysis and advertising. This helps us to improve our website design, plan our marketing efforts, make advertising more relevant for customers and, where we can, avoid advertising unnecessarily.

The legal basis for processing of your personal information in this section is your consent and the legitimate interest of Stabelo or our cooperation partners to drive and improve our business. Please note that withdrawal of any consent does not affect the lawfulness of the processing that has taken place based on a consent given prior to the withdrawal.

4 Situations where Stabelo may share information with third parties

We do not sell your personal information for marketing purposes to other companies. We may only share your personal information as follows:

- when parts of the credit granting and maintenance processes involve the services of third parties and where this requires personal information to deliver that service
- when the third-party service provider handles personal information as described in this policy
- when you have granted your consent for marketing analysis and advertising purposes
- to protect Stabelo and its cooperation partners (including compliance with contractual terms), or

when authorities require information and it is legitimate according to law, regulation or legal process.

When you provide your consent to website tracking for statistics and marketing purposes, we use the following third-party service providers. The table below shows the names and addresses of those service providers as well as their country of incorporation, which determines whether European data protection law (GDPR) applies for them. In some cases, a service provider may have a processor-to-processor (P2P) arrangement with a transfer partner for the transfer of personal information to an entity outside of the European Economic Area where GDPR does not apply. In such circumstances the service provider must use appropriate transfer tools, such as EU Standard Contractual Clauses, for the protection of personal information in the P2P arrangement.

Service provider	Location of the service provider	P2P transfer partner of the service provider, if any	Location of the P2P transfer partner, if any	Relevance in processing of personal data
Google Cloud EMEA Limited 70 Sir John	Ireland, within the European Economic Area	Google LLC 1600 Amphitheatre Pkwy, Mountain View, California, 94043	United States , outside the European Economic Area	3.3 Personalising your user experience 3.5 Marketing analysis and advertising

Rogerson's Quay, Dublin 2				
Google Ireland Limited Gordon House, Barrow Street, Dublin 4	Ireland , within the European Economic Area	Google LLC 1600 Amphitheatre Pkwy, Mountain View, California, 94043	United States , outside the European Economic Area	3.3 Personalising your user experience 3.5 Marketing analysis and advertising

Stabelo may also share aggregated customer data with cooperation partners, third party service providers, or providers of finance for various purposes such as improving service, system administration, statistics, analysis or investment dialogue.

If you do not wish to provide your personal information to us, we may not be able to provide the service you request or inform you about other products and services offered by us.

5 Website tracking, cookies and similar technologies

When you visit our or our partners' websites or mobile applications we may collect certain information about your online activities using website tracking technologies. Website tracking uses so-called cookies, or small text files stored on your device when you visit a website. When you first visit a website, a cookie file is sent to your device that identifies your browser. We also use so-called server-side tracking to ensure that your privacy choices are respected.

Website tracking can be used for different purposes, that depend on the choices you make. Some website tracking features are necessary to make the website work properly and are always turned 'on'. However, you can choose the other features, shown in the list below, that can make the website and your customer experience more convenient for you. If you choose to "allow all" website tracking, then all of the features in the following list may be turned 'on'.

- **Necessary** – necessary tracking is essential for basic website features such as page navigation and access to secure areas of the website. Necessary features are always turned ‘on’ as the website cannot function properly without them.
- **Preferences** – preference tracking enables the website to remember information that changes the way the website behaves or looks, such as your preferred language or region.
- **Statistics** – statistics tracking helps us to understand how visitors interact with the website and further improve it by collecting and reporting information on site usage.
- **Marketing** - marketing tracking allows for tracking across websites which helps us to personalise your ads and improve targeting, such as showing relevant and engaging ads and to avoid advertising towards existing customers.

In addition to the website tracking choices you make, the web browser that you use on your device may offer privacy features, such as Do Not Track functionality. If you have enabled these features, this can help us to know and respect your privacy preferences.

Stabelo takes your privacy seriously. Only with your permission, obtained through the choices you make on our website, we may share part of the information we obtain on your website usage with our advertising, social media and/or analytics partners. Our partners are based in the European Economic Area where European data protection law applies (the GDPR), though in some cases they may have a data processing arrangement with an entity outside the EU.

Website tracking data, including information provided by cookies, is always sent by us in anonymised or pseudo-anonymised form. However, our advertising, social media and analytics partners may combine the website tracking data we have provided with other information that you’ve provided to them or that they’ve collected as you use their services, so that they may be able to associate it with a profile or identity they maintain for you. For this reason, we do not share website tracking information with these partners without your consent.

If you want to learn more about cookies and the steps you can take to protect your privacy on the internet, go to

Your Online Choices: <http://www.youonlinechoices.com/>.

6 Your rights

You have the right to request access and rectification of your personal information held by us, and to receive a copy of your personal information in a structured machine-readable format. If your application for a mortgage has been rejected, you have the right to have your personal information restricted or deleted – see section 3.2. Inquiries regarding processing of personal information and access request shall be directed to the point of contact provided at the end of this policy.

You also have rights to object to certain processing of personal information and, if you have previously given your consent, to revoke that consent. In cases where personal information have been collected for specified and legitimate purposes, you also have the right to object to the processing of that information. These rights may be restricted under certain circumstances – for example, where Stabelo can show legitimate, legal or regulatory requirements, such as when customers have outstanding loans with Stabelo.

In those situations where we need personal information to ensure compliance with regulations or fulfil contractual obligations, the sharing of such information may be mandatory. In other cases, the sharing of information is not mandatory.

Your personal information will be retained in accordance with the provisions of the various subsections of section 3.

7 Transfer of personal information to other countries

Transfer of personal information to third countries outside the EU or EEA that do not offer an adequate level of protection, according to a decision from the European Commission, may only take place if the transfer is covered by adequate safeguards.

Examples of suitable protective measures are:

- a legally binding and enforceable instrument between public authorities or bodies,
- standardised data protection measures adopted by the EU Commission
- standardised data protection measures adopted by a regulatory authority and approved by the EU commission
- an EU-approved code of conduct, together with legally binding and enforceable commitments, for the data protection officer or personal data commissioner in the third country to apply appropriate safeguards, including with respect to the rights of data subjects, or
- an approved certification mechanism, together with legally binding and enforceable commitments, for the data protection officer or personal data commissioner in the third country to apply appropriate safeguards, including the rights of data subjects.

As a main rule, your personal information will not be transferred to countries outside the EU or EEA. If transfer to a country outside the EU or EEA or to an international organisation is relevant, this will take place only when:

- there is a decision from the European Commission that, for example, the country in question ensures an adequate level of protection, or
- we have taken appropriate protection measures, for example by ensuring that so-called Binding Corporate Rules (BCR) or Standard Contractual Clauses (SCC) under the GDPR are in place.

8 Changes and amendments to this policy

Stabelo may, from time to time, update or adjust this policy to reflect new routines to protect personal information and customer rights. These changes will be updated in the Data Protection Policy, which can be found on Stabelo's website. Stabelo will inform its customers about material changes through a clear notification on the company website, via email, SMS or a combination of these. Customers who do not accept changes to the data protection policy need to terminate their services with Stabelo.

9 Jurisdiction and applicable law

This data protection policy shall be governed by, and interpreted in accordance with, Swedish law.

10 How to contact us

If you have questions or comments on our data protection policy you are welcome to contact us by email at info@stabelo.se. You can also contact us by regular post at:

Data Protection Officer, Stabelo Group AB
Sturegatan 15
114 36 Stockholm, Sweden

If you have unresolved objections or complaints you are also entitled to contact the Swedish Authority for Privacy Protection (IMY), *Integritetsskyddsmyndigheten* (www.imy.se).

Applicable from: 22 December 2021

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