

# Data privacy policy

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Stabelo AB

## 1 About Stabelo

Stabelo AB ("Stabelo") is a Swedish company registered at Kungsgatan 10, 111 43 Stockholm with organisation number 559064-2376. Stabelo is a provider and servicer of mortgage loans to Swedish private persons secured on Swedish homes. Stabelo works together with its sister company, a mortgage fund called Stabelo Fund 1 AB ("Stabelo Fund"), which has organisation number 559075-0203. In addition to issuing Swedish mortgage loans, Stabelo maintains your mortgage loan over time, on behalf of Stabelo Fund. This means that Stabelo is the primary point of contact for customers, administering interest payments, managing any changes in loan conditions, termination of loans etc. also during the time when the loan is provided to you by Stabelo Fund, so that Stabelo is also the "controller" for your data protection throughout the life of your loan.

Stabelo and Stabelo Fund are part of the Stabelo group of companies. The holding company of the Stabelo group of companies is Stabelo Group AB, with organisation number 559030-7996. The fund manager of Stabelo Fund is Stabelo Asset Management AB with organisation number 559064-2384, which, like Stabelo, is wholly owned by Stabelo Group AB. In addition to cooperation with other group companies, Stabelo works with a number of service- and system-providers in order to offer customers an effective product and customer experience.

Stabelo offers mortgage loans to Swedish private customers via Avanza, whose parent company is Avanza Bank Holding AB with organisation number 556274-8458. Avanza offers Swedish customers savings products and other financial services primarily via digital channels.

When you use our website or other digital services, we collect, use and process your personal data. When you apply for a Stabelo mortgage loan via Avanza's website,

mobile applications or other digital means, Avanza shares your personal data with us. The safeguarding and confidentiality of these personal data is important to us.

In this Privacy Policy, we explain how we are processing your personal data, 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 data are disclosed to cooperation partners and third-party suppliers.

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

## **2 Applicability of this Privacy Policy**

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 Avanza or our other operating partners.

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 data 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 data**

### **3.1 Introduction**

This Privacy Policy explains how we collect, use and disclose your personal data when you use our service and otherwise interact with us. It also describes our data processing activities, their purpose, what category of personal data 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, normally through our partner Avanza, 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 data may be required also for your co-borrowers.

In order to process your credit application for a mortgage loan smoothly, we use external data suppliers of high quality and integrity, such as for example Swedish Upplysningscentralen ("UC"). 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 data 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, in some cases Stabelo uses services provided by third party suppliers. An example of such a supplier is UC. When this happens, we share your personal data with the third party supplier as needed. The purpose of such personal data 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 data 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 data will be shared with them. Examples of occasions when third-party service providers will handle customer data 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 data 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 10 years or up to 18 months following the end of the term of your mortgage loan, whichever is longer. In the event that your mortgage loan is rejected, however, you have the right to request that your personal information is deleted by us ("the right to be forgotten"). Your request for deletion will be carried out within 3 months of receipt by us.

The legal basis for handling of personal data in this section are the terms that customers agree to when applying for a loan with Stabelo, primarily through Avanza's website, 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 information we have for you in order to pre-fill information in the application form. Such data may be available from third-party 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 data in this section are the terms that customers agree to when applying for a loan with Stabelo, primarily through Avanza's website, 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 Avanza 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 data 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 data 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 data 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 data 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 data.

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 data in this section are the terms that customers agree to when applying for a loan with Stabelo, primarily through Avanza's website, 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**

In order to help you make the most of the products and services provided by us and our cooperation partner Avanza, 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 data may be processed. Examples of such data 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 data 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. If you visit our website, we may present digital media based on your historical web activity. So-called “cookies” are processed for this purpose. When you visit our website, or our cooperation partner Avanza’s website, your online behaviour may be used in order to present relevant media and offers to you. Anonymous-user cookies are not identifiable to a specific person consistent with industry practice. See section 5 of this policy.

The legal basis for processing of your personal data 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 data for marketing purposes to other companies. We may only share your personal data as follows:

- when parts of the credit granting process involve the services of third parties and where this requires personal data to deliver that service
- when the third party service provider handles personal information as described in this policy
- 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.

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 data 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 Cookies and similar technologies

When you visit our or our partners' websites or use our mobile applications we may collect certain information by automated means using cookies. Cookies are 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.

By using cookies, you help Stabelo improve the functionality of our website. They are important to reduce download time and improve your user experience.

We may also use cookies for marketing purposes. Such cookies may be placed on our website by marketing partners of Stabelo, who act as intermediaries in between ourselves and advertisers. Such cookies can serve more relevant information and personal offers through advertising, measure the effectiveness of our advertising campaigns and limit how often we show you offers.

If the settings on your mobile devices permit our mobile applications to collect location information, such information could be collected automatically. This Privacy Policy governs how we use this information when we associate it with your personal data.

Note that you can manage how your mobile device can share location information with us, as well as how your browser handles cookies and related technologies, by adjusting your device' privacy and security settings. Please refer to the instructions provided by your browser provider or the manufacturer of your device to learn how to adjust your settings.

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 data held by us, and to receive a copy of your personal data in a structured machine-readable format. If your application for a mortgage has been rejected, you have the right to have your personal data restricted or deleted – see section 3.2. Inquiries regarding processing of personal data 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 data and, if you have previously given your consent, to revoke that consent. In cases where personal data have been collected for specified and legitimate purposes, you also have the right to object to the processing of that data. 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 data to ensure compliance with regulations or fulfil contractual obligations, the sharing of such data may be mandatory. In other cases, the sharing of data is not mandatory.

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

## 7 Transfer of personal data to other countries

Transfer of personal data to third countries outside the EU or EEA that do not offer adequate protection 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.

## 8 Changes and amendments to this policy

Stabelo may, from time to time, update or adjust this policy to reflect new routines to protect customer data and 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](mailto:info@stabelo.se). You can also contact us by regular post at:

Data Protection Officer Stabelo AB  
Kungsgatan 10  
111 43 Stockholm, Sweden

If you have unresolved objections or complaints you are also entitled to contact the Swedish Data Inspectorate, Datainspektionen ([www.datainspektionen.se](http://www.datainspektionen.se)).

**Applicable from:** 25 May 2018 / **Last updated:** 24 May 2018