

PRIVACY STATEMENT

Introduction

In this privacy statement overview we provide a description of collection, use, storage and sharing of personal data. SpareBank 1 Markets AS protects your rights and your personal data. SB1M has a duty of confidentiality and will process your personal data in accordance with the Personal Data Act with regulations.

Personal data collected, recorded and delivered by us

Personal information is all information and assessments that can be linked to you as an individual (name, birth and social security number, e-mail address, telephone number, information concerning income and debt etc.). SB1M collects, among other things, the following categories of personal data:

- Identification information, such as name, birth and social security number, other identification numbers issued by public authorities and a copy of identification.
- Contact information, such as phone number, address and email address.
- Financial information, such as customer and product agreements, revenue information, bank account number, VPS account number and transaction data.
- Statutory information, such as information in connection with investment advice, information in connection with anti-money laundering work and reporting to public authorities.
- Statutory audio recording of telephone conversations the customer has with us, as well as documentation on communication through e-mail and chat channels such as Bloomberg, Reuters and AIM.
- Digital information related to our customers and our employees' use of our websites, digital applications and platforms such as traffic data, location data and other communication data related to a person, as well as e-mail.
- Names and contact information of our employees, including temporary staff member, consultants and temporary employees, including telephone number, address and other contact information, CVs, social security numbers, account numbers, payroll information, information about any forced payroll deductions, an overview of any authorizations the employees have for the performance of investment services or similar.
- Other information about employees that is necessary to fulfil the employment contract with the employees, including any sick leave and underlying documentation for this, information that has come forward in dialogue with NAV/ occupational health service as part of the follow-up of sick leave employees, as well as information about possible injuries and illnesses in connection with registration obligations for injuries and illnesses.
- Employees' VPS account number, sums retained in VPS and documentation of transactions within financial instruments.

- Photos and videos of the staff.
- The name of the employees' relatives and relatives, telephone number, as well as their VPS account number, sums retained in VPS and documentation of transactions made in financial instruments.
- Access control information; overview of access employees has to SB1M's premises, and audit trails for employee use of professional systems.
- Identification information about job applicants, such as names, contact information such as telephone number, address and other contact information, as well as other information that appears in the job application and CV provided by the job applicant, as well as any attachments to the application and CV, such as certificates and transcripts.
- Information about candidates who are selected for a position in SB1M, including credit checks, examination of business interests and any information that emerges from background checks that are carried out when searching World Check. This may include, for example, any convictions, negative news / hits, hits on the PEP, if they are subject to sanctions, terrorist lists, information on any frozen funds, etc. For candidates who are nominated for the position, a copy of the ID will be obtained (for e.g. passport), in addition, a reference check will be conducted with the person (s) that the candidate has specified as a reference and, if necessary, confirmation of completed studies. For some types of positions in SB1M, it is required to obtain a certificate of conduct.
- Contact information (name, telephone, e-mail, etc.) to former employees and employment contract.

The source of information

We will mainly receive personal data that is registered directly from you as a customer. In addition, we collect information about you from publicly available sources at public and private companies. We collect information from others about you in order to provide you with services, comply with legal requirements and in order to quality assure information you have provided us. Examples of this may be publicly available sources / registers or sources from private companies. In addition, we obtain credit information about customers from credit reporting agencies. Furthermore, upon entering into the agreement and during the ongoing contractual relationship, we will register information about you and other persons connected to the contractual relationship, for example persons with a trading authorisation.

We will also register information concerning persons with whom we have refused to enter into an agreement. The intention of collecting this information is to inform the person of the rejection and possibly subsequently document the situation. In order to carry out customer control according to the money laundering regulations, we obtain information from other public authorities, such as the Brønnøysund Register. In addition, we collect information from sanctions lists maintained by Norwegian authorities and international organizations, such as the EU and the UN. We also collect information for this purpose through open source search engine providers.

In connection with customer onboarding process, SB1M is legally required to obtain information about the company's key personnel and beneficial owners. The information is acquired from the Brønnøysund Register and commercial information services that provide information about beneficial owners and PEP.

In terms of employment, SB1M as an employer obtains information from the employees that is necessary to fulfill the employment contract with the employee. Upon follow-up of employees who are on sick leave, statutory information will be obtained from the NAV or optionally from the occupational health service.

SB1M collects information from job seekers due to recruitment processes, regarding their education and work experience and underlying documentation for this. For selected candidates a background check and a credit check are also conducted, as well as a check of references provided by the candidate. Quality assurance of submitted documentation and confirmation of completed studies may also be conducted.

Registered personal data will be disclosed to public authorities and other entities, such as the Oslo Stock Exchange, when this is a statutory disclosure requirement or is information SB1M has the right to disclose. We will always ensure that we do not share information concerning issues where we have a duty of confidentiality, unless you have given us a written consent to share the information or the disclosure of the information is permitted by law.

We will also disclose personal information to other companies in the Group if disclosure is necessary to satisfy group-based management, control and / or reporting requirements set by law. Further, we will disclose information pursuant to law or if the customer has consented to the transfer of personal data. SB1M presupposes that the processing of personal data is subject to the duty of confidentiality in the company to whom the information is disclosed to.

When conducting transboundary transactions for a customer, the associated personal data may be disclosed to the foreign company concerned and / or its assistant. The recipient country's legislation regulates to which extent such personal data will be disclosed to public authorities or regulatory bodies, for example, to comply with the recipient country's legislation concerning tax and fee and measures against money laundering and terrorist financing.

In some cases, SB1M has the right to transfer personal data to organisations in countries outside the EU / EEA (third countries), provided certain conditions are met. This would be the case, for example, in support of computer systems where data processor or their subcontractor is given access to personal data in connection with the performance of data support. It is required that there is a valid basis for such transfers. For example, it may occur that the European Commission has decided that there is an adequate level of data protection in the country concerned. Furthermore, personal data may be transferred to third countries if other appropriate security measures have been taken and / or a data processor has provided the necessary guarantees that the personal data will be processed in a secure way, for example by using standard contracts (EU standard clauses) approved by the

European Commission, or the data processor has valid binding corporate rules (BCR). Personal data may also be transferred where there are exceptions in special cases, for example to fulfil an agreement with you or in cases where you consent to the particular transfer.

Norway has entered into an agreement with the United States on mutual tax reporting, known as FACTA (the Foreign Account Tax Compliance Act.) Under the agreement, Norwegian financial institutions are obliged to identify and report US citizens and persons who are resident in the United States for tax purposes to Norwegian tax authorities. Further information about the FATCA can be found on the web site of the US tax office or the Tax Administration.

According to the Tax Commission in Norway, the companies who have a duty to disclose information must identify account holders who are tax resident in other countries. This is also known as the Common Reporting Standard (CRS). New accounts cannot be created until self-declaration is obtained and reviewed. There is more information concerning CRS at Skatteetaten's websites.

The purpose of SB1M's processing of personal data

We process personal data for the following purposes:

- Customer service
- Marketing
- Risk Classification of customers
- Appropriateness Test and suitability test attached to investment services
- Prevention and detection of criminal offenses
- Audio recording of telephone calls and storage of other customer communications concerning investment services.
- Accounting requirements
- Security measures for the protection of personal data
- Human Resources Administration
- Keeping insider lists in accordance with the requirements in the Securities Trading Act section 3.1 (1)

Customer service

The purpose of our processing of personal data is primarily to provide investment services and related services, customer support and to fulfil the obligations we have undertaken to carry out assignments and client business. This information is required, in order to provide customer service during throughout the contract period and to carry out necessary processes related to our contractual relationship with you as a customer. For example, it can be transactions that SB1M carries out on behalf of you.

We will also process your personal information to evaluate and consider if you have any claim against SB1M.

Lawful basis to process personal data

The basis of processing is primarily the agreement with you. In addition, we also have a legitimate interest in managing your customer relationship and in storing documentation and history that demonstrates that we have fulfilled our obligations towards you and various supervisory authorities.

Marketing

SB1M also processes personal information related to marketing of our services. We want to give you the best possible advice, and will offer you products and services that meet your wishes and needs. This is done by using our knowledge of your existing customer relationship and based on the consent you have given us. SB1M will further use neutral personal information such as name, contact information, date of birth and what services or products the customer has already entered into.

Lawful basis to process personal data

SB1M may process your personal information for marketing purposes, if it is necessary to safeguard a legitimate interest that outweighs your privacy. If products and services are promoted within product categories other than those that you and SB1M have agreed to, it is necessary to obtain a consent from you to use customer information other than names and contact information, and what products you have. In this case, we will ask your consent so that suitable advices and offers can be carried out in best possible way.

Risk Classification of customers

SB1M uses customer information to lower its own risk of loss. SB1M processes credit information and other personal data concerning to establishment and use of systems for calculating capital requirements and credit risk. In this context, personal information can be obtained from credit information agencies.

Lawful basis to process personal data

The processing of personal data is executed, in order to fulfil our legal obligations.

Assessment of suitability or appropriateness

In accordance with the Securities Trading Act, SB1M will conduct suitability tests or appropriateness tests from you prior to trading.

Suitability test is carried out to enable SB1M to act in customer's best interest.

We will perform a suitability test when providing investment advices, to ensure that the financial instrument and transaction is suitable for you.

When SB1M provides other investment services, we will perform an appropriateness test to determine if the service is appropriate for you.

Lawful basis to process personal data

The processing of personal data is carried out in order to fulfil our legal obligations, including the Securities Trading Act.

Prevention and detection of criminal offenses

SB1M will process personal data for the purpose of preventing, detecting, resolving and handling money laundering and other criminal acts. The information may be obtained from

and disclosed to other banks and financial institutions, the police and other public authorities if consent is given to disclosure or if the disclosure is authorized by law.

We will process personal data to fulfil the duty of investigation and reporting of suspicious transactions under the Securities Trading Act and the Money Laundering Act. We are required to report suspicious information and transactions to the Financial Supervisory Authority and Økokrim (the Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime).

In addition, SB1M has an obligation to investigate and report suspicious transactions under the Money Laundering Act, as well as to conduct customer control of all our customers.

Under the applicable law, you do not have access to the information we have registered for these purposes.

Lawful basis to process personal data

The processing of personal data is carried out in order to fulfil our legal obligations. We also have a legitimate interest in preventing, uncovering, solve and handle criminal offenses against us

Audio recording of telephone calls and storage of other customer communications on investment services

As an investment firm, we have an obligation to make audio recordings of all telephone conversations and document other customer communication (e-mail, chat etc.) regarding provision of investment services. This is done in order to safeguard your security and at the same time being able to document that we have provided sound and qualified advice. Such audio recordings and documentation of other types of communication with you is kept for at least five years.

We can find the audio recording on the basis of incoming and outgoing telephone numbers, the time of the call and / or the employee or the company that conducted the call. We can find communication through other communication channels on the basis of your identity, time of communication and by our employee or the company that participated in the communication. There is a limited number of people at SB1M who have access to this.

Due to statutory obligations, SB1M may be required to disclose information to the public authority and others who may require it in accordance with law. In addition, information may be provided to the Financial Complaints Board for handling of complaints.

Requests for access to documentation of investment services and playback of audio recordings are addressed to klagebehandling@sb1markets.no. When requesting playback of audio recordings, you must specify the time when the call was completed and from which telephone number you called or was contacted at.

Lawful basis to process personal data

The processing of personal data is carried out in order to fulfil legal obligations under the Securities Act.

Accounting Requirements

SB1M also processes personal information due to our accounting requirements. This means that SB1M carries out ongoing accounting, documentation, specification and storage of accounting information.

Lawful basis to process personal data

The processing of personal data is carried out in order to fulfil our legal obligations, including the Accounting Act and the Securities Trading Act.

Information about job seekers and selected candidates

SB1M collects information from applicants for positions in SB1M and processes the information corresponding to reviewing the applications and to assess the applicants for the position, as well as contacting relevant candidates during the recruitment process.

The candidate(s) selected for the position will, if he or she consents, undergo a credit check as well as a background check. This is done in order for SB1M to assess the candidate's suitability. An orderly economy is required for the candidate to be considered suitable for working in SB1M. A background check of the candidate is performed by searching in World Check. Information that will be checked in World Check includes amongst other any convictions, negative news / hits, hits on PEP, if the person is subject to sanctions, hits in terror lists, information on any frozen funds etc.

Lawful basis to process personal data

SB1M processes information by reviewing job applications and CVs from job seekers. This is done in order to conduct an agreement with the applicants to conduct a recruitment process.

In order to be able to conduct a background check and credit check of the candidate who is selected for the position, SB1M requests the consent of the candidate.

Human Resources Administration

SB1M processes personal information about employees due to Human Resources administration, including names, Date of Birth, account numbers etc.

This processing of personal data is necessary as part of the completion of the employment agreement with the respective employees. This information is necessary, in order to, for e.g pay wages.

Lawful basis to process personal data

The processing of this information is necessary, in order to fulfil a employment agreement with the respective employee, temporary staff member or the consultant.

Contact information (name, phone, e-mail, etc.) to former employees and employment contract

SB1M processes contact information about former employees and stores their employment contract.

Lawful basis to process personal data

The processing of personal data is carried out in order to fulfil our legal obligations, including the Securities Trading Act.

Controls related to employees and their close associates' trading

SB1M processes personal data for compliance with regulatory requirements related to our employees 'and their close associates' trading in financial instruments. This is limited to what we need to meet our regulatory requirements, including employee names and their close relatives, VPS account number, sums retained in VPS, and documentation of transactions made.

Lawful basis to process personal data

We have a legal obligation to carry out control of the trading activities of employees and their close associates within financial instruments. In order to conduct controls of our employees' trading within financial instruments through our electronic systems, we rely on the consent of the individual employees.

Information about access control, electronic logs and audit trails of employee use of our websites, digital applications and platforms related to a person, as well as email

For security reasons, including preventing unauthorized access to systems and information, SB1M processes information related to employees and their physical access into SB1M's premises. To comply with information security requirements, SB1M processes information about audit trails in professional systems and has electronic logs of employee use of our websites, digital applications and platforms associated with a person.

Lawful basis to process personal data

SB1M has a legitimate interest in processing information regarding employees and their physical access in SB1M's premises. To comply with information security requirements, SB1M processes information about audit trails in professional systems and electronic logs of employee use of our websites, digital applications and platforms associated with a person.

Marketing and promotion of SB1M employees

SB1Ms uses images and/ or video of our employees for marketing and promoting employees and / or SB1M.

Lawful basis to process personal data

SB1M uses images and / or videos of our employees for marketing if the employees concerned have consented to this.

Security measures for the protection of personal data

SB1M strives to process and protect your personal information in a safe and secure manner. SB1M conducts technical and organisational security measures to secure your personal information. We are constantly working to ensure that your personal information is protected against loss, misuse, accidental access, disclosure, alteration or destruction. This is done through access management, logging off servers and systems, encryption, firewalls and other measures that support the security of SB1M. We have our own management system for information security, access control, non-conformity management and training.

Lawful basis to process personal data

We process personal information to fulfil our contractual obligations with you, legal obligations incumbent on SB1M and our legitimate interest in safeguarding you and our values and interests.

Personal information for persons other than customers in SB1M

We also process personal data for individuals who are not in a traditional customer relationship with SB1M. Such processing may, for example, be relevant if you subscribe to our analysis services or apply for a job at SB1M. SB1M processes all personal information, both to customers and other contacts, in accordance with applicable Privacy laws as set here.

Legal basis for processing

A data controller must have a valid lawful basis in order to process your personal data. Below, the relevant processing bases SB1M has for processing personal data will be explained.

Necessary to fulfil an agreement with you

The main purpose of processing your personal data is customer service, providing investment advice, and carrying out services in accordance with the agreements we have entered into with you.

Consent

If no other legal basis exists, our processing will be based on voluntary, express and informed consent from you. For example, consent is not required for personal information that is recorded and used to execute an agreement or perform an assignment from you. If you have consented to the processing of your personal data, this can be withdrawn at any time.

The consent we request is obtained through mail or email inquiries from SB1M, which must be answered positively by you as a customer in order for consent to be given. The consent shall cover and refer to the specific activity the consent is linked to.

An example of processing personal data where we would ask for your consent is for marketing purposes.

Legal Obligations

SB1M also processes your personal information to fulfil our obligations according to law, regulations or governmental decisions.

Below are some examples of processing conducted on the basis of our legal obligations:

- Knowledge about you as a customer
- Prevention and detection of criminal offenses, including money laundering and terrorist financing
- Sanctions Monitoring
- Accounting Requirements
- Reporting to supervisory authorities
- Risk assessment
- Other obligations related to service or product-specific legislation, such as securities.

Legitimate interest

We may use your personal information if necessary to safeguard a legitimate interest that outweighs your privacy. The legitimate interest must be legal, pre-defined, real and factually justified in the business.

SB1M has among other things a legitimate interest in using personal data for marketing purposes. The purpose is to give you the best possible advice, and offer you products and services that meet your wishes and needs. This is achieved by using our knowledge of your existing customer relationship and based on the consent that is already given by you.

Your rights

Information about handling and right of access

You always have the right to access your personal data we have stored. We will disclose registered personal information about you if you ask us in writing. You may, by written and signed inquiry, request access to the personal data we have stored about you, a description of the types of information processed, and further information about the processing.

Note that the right of access may be limited by legislation and protection of another persons' privacy.

Right of access

You have the right to request access to the personal data we process about you and you have the right to obtain a copy of this information. In addition, you have the right to access information on how SB1M process your data. Mainly, how your data is processed is found here in our privacy statement.

In some cases, there are exceptions to the right of access. Typically, where we have a duty of confidentiality or where we have to keep the information secret for the purposes of prevention, investigation, disclosure and legal prosecution of criminal offenses. Exceptions are also provided if information is only contained in documents prepared for internal case preparation and exceptions to the right of access are necessary to ensure a satisfactory procedure.

If you are an employee, former employee or have applied for a position in SB1M and would like to order information related to this, please contact the Data protection Officer in SB1M at the email address personvern@sb1markets.no. The same applies if you have otherwise been engaged by SB1M to carry out tasks for us. Please enter a phone number you want to be contacted on.

Right to correction and deletion

We will delete or anonymise registered personal data when the purpose of the individual processing is fulfilled, unless the information should or can be stored further according to legislation. Within the limits laid down in the Personal Data Act, the customer may demand correction or deletion of deficient and unnecessary personal information. Incomplete personal data may also be required to be corrected.

You have the right to claim your personal data deleted, if you withdraw consent to the processing or you object to the processing of the personal data and there is no other justifiable reason for the processing.

The information may also be required to be deleted if you refuse marketing from the company that processes your personal information. Furthermore, you can also request that your personal data to be deleted if the processing of the information is illegal.

Claims for rectification or deletion are sent to personvern@sb1markets.no. Please note that there may be restrictions on legislation to correct registered personal data.

Right to restrict processing of personal data

If you mean that the information recorded is incorrect or disputes the lawfulness of the processing, or if you have objected to the processing, you can ask SB1M to only store the information and not process it further. The processing will then be limited to storage, only until the information is corrected, or it can be determined that SB1M's legitimate interests take precedence over your interests as a customer.

Please note that if you do not have the right to delete the information we have recorded about you, you may request that we limit the processing of this information to storage only. If the processing of the information we have recorded about you is necessary to promote a legal claim, you may also require that other processing of this information be restricted to storage. We may process your information for other purposes if this is necessary to further a legal claim or if you have consented to it.

Right to data portability

If SB1M processes information about you on the basis of consent or agreement, you have the right to have your personal information provided to yourself or another processing officer, upon request in a machine-readable format. This right applies only to the personal data that you yourself have provided to us and which is processed based on consent or agreement.

Right to object

You have the right to object to the processing of your personal data on the basis of legitimate interests unless such interests violate your fundamental rights or freedom.

If the processing of your personal data is based on our legitimate interest and the information is used for direct marketing and profiling concerning such marketing, you are always entitled to raise objections to the processing.

Storage time

SB1M keeps your information, for as long as, it is needed for the purposes for which your information was collected and processed, or as long as required by law and regulations. When we store your information for purposes other than those applicable to the fulfilment of an agreement, for example, based on anti-money laundering requirements, we will only retain the information if necessary and / or required by laws and regulations for that purpose. We will limit access to your personal information at any time based on who has a service need for such access.

In cases where the retention of your personal data is based solely on your consent and you withdraw your consent, we will delete the information as soon as possible.

Below are some examples of storage duration:

- Customer information including name, address, telephone number, other contact information, account number, VPS account number, birth number, financial and credit information, background check and World Check information: kept for at least 5 years after the last transaction.
- Documentation obtained regarding recruitment: For candidates who obtain the position, the documentation will be retained during the term of employment and after the term of employment, SB1M retains the name of the former employee and contact information, as well as the employment contract for 5 years after resignation. For job seekers who do not get the position, personal data and all documentation will be deleted immediately.
- Documentation collected and prepared to prevent and detect money laundering and terrorist financing: 5 years after last completed transaction or 5 years after ended customer relationship.
- Information we are required to keep in accordance with the Accounting Act and the Accounting Regulations: at least 5 years after the last transaction.
- Sound recording and documentation of correspondence on Bloomberg, Reuters and AIM of investment services and related services: 5 years after the last transaction completed.
- Documentation and history related to the execution of an agreement: up to 5 years after the last completed transaction or closed customer relationship

If you have any queries regarding storage time of your data, please feel free to contact us at personvern@sb1markets.no

Statistics and use of cookies

SB1M's websites uses cookies. This consists of bits of data stored on your computer or mobile phone by the browser you are using. A cookie belongs to a particular website and cannot be read by other websites. In addition to cookies, we use third-party pixels and scripts.

We use Google Analytics and Adobe Analytics to collect information and SB1M has agreements that guarantee that users will remain anonymous and that no personally identifiable information is sent or shared with Google or other third parties. The data collected in Adobe Analytics is stored on servers in the United Kingdom and the Netherlands. In cases where Google Analytics is used, the information about your use will be stored on Google's servers in the United States.¹

If you have been on our website, we measure activity in the form of statistics such as:

- What you do on our web site, such as the pages you visit including the frequency and length of your visits to our web site.

¹ Use of Google Analytics is described at <https://policies.google.com/technologies/partner-sites>

- Your approximate geographical location using IP address, which is then anonymised.
- Technical information about your browser and your operating system.

We will again use this to different customer groups, so that we can prepare better recommendations and provide you with information and products tailored to your needs.

Different types of cookies, pixels and scripts that we use

Operation and safety

These cookies are central to the underlying operation and support important functionality.

User customisations and page experience

We use these cookies to support your experience of the site. They give us "memory" of your previous use and basis for optimising content and solutions.

Marketing and third-party cookies

Cookies from us are used to measure what you do on our website. The information can be used to build interest and user group profiles as well as to develop and show you relevant ads.

By using third-party cookies, pixels and scripts, you may experience marketing messages from us, based on pages you have visited (retargeting). This also allows us to stop showing an ad when a defined point in a process is completed. These cookies contain only aggregated information and no information that can identify you as a user.

Cookie usage settings

You can delete registered cookies in your browser if you wish. However, please note that this may cause disruption to some of our websites.

Contact information

If you have any questions about this privacy statement or SB1M's processing of your personal information, you can contact us on +47 24 14 74 00 or our Data Protection Officer via personvern@sb1markets.no.

Amendments

If we make changes to the rules regarding the processing of personal data, changes to our services and products or other changes that may affect the privacy statement, it will be stated in the change log below.

Change log

16.04.2021	The purpose of SB1M's processing of personal data: "Keeping insider lists in accordance with the requirements in the Securities Trading Act section 3.1 (1)" added as last bullet.
16.04.2021	Statistics and use of cookies: "with Google or other third parties" added in the end of first sentence, second paragraph. Footnote inserted.

In case there are points of conflicts between the Norwegian and English version of this Policy, the Norwegian version will prevail.