

Oma Savings Bank's privacy policy – Private customers

1. General

OmaSp takes the compliance with the EU's General Data Protection Regulation and other legislation concerning the processing of personal data seriously. We ensure that the processing of personal data is secure and that our privacy policies enable the full realisation of the rights of data subjects.

With this privacy policy, we provide OmaSp's private customers with the information required by the EU's General Data Protection Regulation and other applicable data protection legislation on how we process their personal data when providing banking services.

OmaSp may make changes to this privacy policy. You can always find the up-to-date privacy policy on our website: omasp.fi. This privacy policy was last updated on 18 February 2025.

2. Data Controller

Oma Savings Bank Plc
 Postal address: P.O. Box 77, 53101 Lappeenranta
 Phone: +358 207 640 600
 Visiting address: Valtakatu 32, 53100 Lappeenranta
 Website: omasp.fi

("OmaSp" or "we")

3. Contact details of the Data Protection Officer

OmaSp's Data Protection Officer
 Postal address: P.O. Box 77, 53101 Lappeenranta
 Email: tietosuoja@omasp.fi

4. Who does this privacy policy apply to?

This privacy policy applies to the following data subjects:

- OmaSp's current private customers;
- OmaSp's potential private customers; and
- Private persons related to OmaSp's private customers, such as guardians, holders of power of attorney and other authorised representatives, guarantors and pledgers, with whom OmaSp is in contact in connection with the customer relationship

("Data Subject" or "You")

5. What personal data do we process?

We process data belonging to the categories of personal data described below. The list of examples presented in the table is not exhaustive and the data collected may vary depending on the group of data subjects and the purpose for which they are used.

Category of personal data	Group data content	Examples
Basic	Basic identifying information about a person	Name, social security number and contact information, such as phone number, email address and postal address
Knowing Your Customer (KYC)	Information related to knowing a person as defined by legislation	Passport or identity card information, such as expiry date, issuer and number,

		nationality, politically exposed person (PEP information), tax information
Customer information	Information related to customer relationship management and monitoring	Start date of the customer relationship, nature of the customer relationship
Consents	Consents, withdrawals and prohibitions given by the data subject regarding the processing of personal data	Marketing consent, consent for electronic direct marketing
Contract and product information	Information on agreements between the data controller and the data subject; Information about the products and services purchased by the data subject	Account agreement, promissory note, online banking agreement, insurance-based investment products
Customer transaction information	Transaction information related to the data subject's banking transactions	Credit transfers, payment transactions, cash transactions
Background information	Background information provided by the customer or obtained from other sources	Life situation, financial status
Interests	Information about the interests of the data subject	Interest in a certain OmaSp product or service, such as interest in investing
Technical management and identification data and behavioural data	Technical identification data related to devices or systems; data collected about the data subject's behaviour in different channels with the help of cookies	IP address, device or application identifier, electronic service usage and browsing data
Recordings and message content	Recordings related to conversations and communication with the data subject and visits to our branches	Call and video recordings, chat conversations, web conferences and messages

6. For what purposes do we process personal data?

OmaSp processes personal data only for predetermined purposes or for purposes compatible with them.

We process personal data of data subjects for the purpose of providing services and operations to our private customers and to fulfil our legal and contractual obligations.

This includes, but is not limited to:

- distinguishing and identifying data subjects;
- communication with OmaSp's private customers and their potential representatives;
- customer relationship management and customer service;
- risk management and ensuring safety;
- fulfilling retention, reporting and inquiry obligations arising from the law and in accordance with the regulations and instructions of the authorities;
- developing the quality and functionalities of services; and
- marketing of OmaSp's products and services.

7. On what legal bases do we process personal data?

We will always ensure that we have a basis for processing your personal data in accordance with the EU General Data Protection Regulation. The processing criteria used by OmaSp and their examples are described in the table below.

Legal basis	Description	Examples
Performance of the contract	We collect and process personal data in order to perform the contract between us and the data subject and to take measures prior to entering into a contract.	Examples of agreements on the basis of which we process personal data: <ul style="list-style-type: none"> • account agreement; • online banking agreement for private customers; and • card agreement.
Compliance with legal obligations	We need to process personal data due to legal obligations and decisions of the authorities.	Examples of our legal obligations: <ul style="list-style-type: none"> • the obligation to verify identity and know the customer; • prevention of money laundering and terrorist financing, compliance with sanctions regulations and freezing orders; • requirements related to payment services; • accounting and risk management obligations, such as credit and collateral risks, as well as capital adequacy requirements; • the obligation to report to authorities such as customs, tax, police, enforcement and supervisory authorities; and • other obligations related to service- or product-specific legislation, such as obligations related to loans, funds and collateral.
Legitimate interest	The processing of personal data may be justified due to OmaSp's legitimate interest. We will always ensure that such processing is proportionate to the interests and rights of the data subject.	Examples of processing based on our legitimate interest: <ul style="list-style-type: none"> • marketing our products and services; • conducting customer satisfaction and marketing surveys to develop services or products; • developing and managing systems and processes, including testing; • developing statistics and analyses, for example to improve credit risk models; • implementing camera surveillance at our branches to prevent and investigate situations that endanger safety; and • establishing, exercising or defending legal claims.
Consent	We may also process your personal data on the basis of your separate consent.	Examples of processing for which we may ask for your consent:

		<ul style="list-style-type: none"> • electronic direct marketing; • use of cookies on the OmaSp website.
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8. Profiling and automated decision-making

OmaSp may utilise the profiling of personal data, for example, to assess credit risk, prevent and detect money laundering and fraud, assess the likelihood of insolvency risk or the value of assets.

In automated decision-making, our systems make decisions based on information about you, without human intervention. This may include not only the information we already have, but also information obtained from public registers and other public sources, depending on the type of decision in question.

We will always clearly inform you if we use your personal data for automated decision-making. You have the right to express your opinion on a decision based solely on automated processing, such as profiling, whether the decision in question produces legal effects concerning you or if the decision otherwise has a similarly significant effect on you. You also have the right to demand human participation in decision-making.

9. Where do we get personal data about you?

We collect personal data mainly from the data subject or their representative. Data is collected when the data subject visits OmaSp's branches or otherwise contacts OmaSp, for example, by phone, through feedback surveys or digital channels.

We also receive information from third parties, such as registers maintained by the authorities (e.g. the Population Information System, the Positive Credit Information Register and other Tax Administration registers, the title and mortgages register) and credit information registers. We receive information related to payment orders from money transfer service providers, shops, other banks, payment service providers and other similar parties.

We also use national and international registers to determine whether the data subject is a politically exposed person (PEP data) and to ensure that the data subject is not subject to sanctions regulations or freezing decisions.

10. Disclosure of data

Bank secrecy restricts the disclosure of information held by OmaSp: OmaSp may disclose personal data only with the permission of the person in question or when the disclosure of information has been separately provided for in applicable legislation. OmaSp only discloses personal data when there is a justified need for it and always in accordance with the requirements of legislation.

Personal data is regularly disclosed:

- to authorities, such as the police, enforcement authorities, the Finnish Financial Supervisory Authority FIN-FSA and the Tax Administration to the extent required by law;
- to external business partners and operators, such as card companies or recipients of card transactions and payment service intermediaries.

11. Transfer of personal data to processors

We have outsourced data processing tasks and use subcontractors and partners, such as IT suppliers, to produce and provide services. We may transfer your personal data to such parties for processing on our behalf. Even after the transfer, we are responsible for the personal data we transfer to the processors as a data controller. Subcontractors and partners may only process the personal data we provide to them in accordance with our instructions and are not entitled to use the personal data they receive from us for their own purposes. Through contractual and other arrangements, we ensure that our subcontractors and partners always process personal data carefully, in compliance with the requirements of legislation and good data processing practices.

12. Transfer of personal data outside the European Union or the European Economic Area

OmaSp mainly processes personal data within the EEA (EU member states, Iceland, Liechtenstein and Norway). If we transfer your personal data outside the EEA, we will ensure an adequate level of protection of your personal data as required by law and use the data transfer mechanisms approved at the time, such as the European Commission's Standard Contractual Clauses.

13. How do we protect your personal data?

OmaSp has appropriate technical and organisational security measures in place to ensure the processing of personal data in a secure manner that meets the requirements of legislation. We also require our subcontractors to provide appropriate protection for the personal data being processed.

14. What rights do you have as a data subject?

As a data subject, you have the rights described below under data protection legislation. You can submit a request for your rights described here at one of our branches or online banking.

Data Subject Rights	Description
The right to access your personal data	You have the right to access your personal data held by OmaSp. However, this right may be restricted by law, the protection of the privacy of other people and the protection of OmaSp's trade secrets.
The right to demand the rectification of incorrect or outdated information	You have the right to demand that incorrect information about you in the register be corrected, erased or supplemented, unless this is restricted by legislation.
The right to object to data processing	To the extent that we process your personal data on the basis of a legitimate interest, you have the right to object to the processing of your data on grounds relating to your particular personal situation. You also always have the right to object to the use of your personal data for direct marketing purposes.
The right to request restriction of processing	If you have reported that your data is incorrect, you have the right to request restriction of the processing of your data, for example, while any requests concerning your data have been clarified or resolved.
The right to request erasure	You have the right to demand the erasure of your data, for example, if you object to the processing of the data and there is no justified reason for continuing the processing or if the processing of the data is unlawful. However, due to regulations in the financial sector, OmaSp is in many cases obliged to store your personal data for the duration of the customer relationship and even after it, if the processing of the data is necessary, for example, to comply with legal obligations or to process legal claims.
The right to transfer data to a system maintained by another party	You have the right to receive the data you have provided yourself with in a machine-readable format and to transfer it to a system maintained by another party when the processing of the data is based on a contract or consent, the processing of the data is carried out automatically and the transfer is technically possible.

The right to withdraw consent	To the extent that we process your personal data on the basis of consent, you always have the right to withdraw your consent. The withdrawal of consent does not affect the lawfulness of the processing of personal data carried out before the withdrawal.
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15. How long do we retain your personal data?

We will only store your data for as long as it is needed for the purposes specified in this privacy policy or we have a legal obligation to keep the data. After this, the personal data will be deleted or anonymised.

The applicable retention periods vary depending on the purpose of use of the personal data in question and the legal basis for the processing. Below are examples of the retention periods we observe:

- As a rule, the information concerning the customer relationship and the contract is stored for ten years after the end of the customer relationship in order for OmaSp to prepare, present and defend any legal claims and to demonstrate that it complies with the obligations set by law and regulations.
- Customer due diligence data (Knowing your customer KYC) is stored for five years from the end of the said contractual relationship as required by legislation on the prevention of money laundering and terrorist financing.

16. Cookies

The Omasp.fi website uses cookies to implement the website's functions, develop user experience and for marketing activities. A cookie is a small text file that is stored on the user's computer when visiting a website. You will be asked for your consent to the use of cookies when you visit our website for the first time and you can later modify your cookie preferences on our website under "Cookie settings".

17. Notification to the Data Protection Ombudsman

If you consider that the processing of your personal data is not lawful, you have the right to lodge a complaint with the Data Protection Ombudsman. Contact information can be found on the website www.tietosuoja.fi.