## Notice Regarding the Processing of Personal Data of Former Danske Bank A/S Lithuanian Branch Customers

20.10.2025

Since Danske Bank A/S' Lithuanian branch no longer conducts banking activities in Lithuania, we no longer have active customers. We notify former customers that we retain their personal data solely to comply with Lithuanian law, legal obligations and subject to legitimate interest.

Our privacy notice dated July 22, 2019, provided below, is still applicable for our former customers explaining why Danske Bank A/S Lithuanian branch originally collected their personal data and how it was processed.

Please note that the rights of all former customers as data subjects remain valid as long as we retain their personal data. You can exercise these rights at any time by contacting us using the contact details provided in the Danske Bank personal data protection notice below.

# DANSKE BANK PRIVACY NOTICE

Applicable from 22 July 2019 in Lithuania

## INTRODUCTION

Danske Bank A/S is a financial institution that offers financial advice and services to its customers.

In the course of our business, we register and use information about you (personal data). We do so to offer you the best advice and solutions, fulfil agreements with you and comply with legal requirements.

We protect your data and privacy by taking all relevant measures in accordance with applicable legislation.

This Privacy Notice sets out the basis for how Danske Bank A/S Lithuania branch within Danske Bank Group look after your personal data and the privacy rights you are granted by law.

Privacy Notice applies to personal data about individuals, it does not govern data about legal entities. Privacy Notice also applies to all personal data relating to natural persons in the course of a professional activity, such as the employees of a company/organisation. In this case in the course of our business, we register and use information about you (personal data), when you interact with us as an individual who is connected with a Business Customer of ours. You could be an authorised signatory, a beneficial owner, a director, an employee, a guarantor, a pledgor or a third party connected to our customer.

The definitions used in this Privacy Notice have the same meaning as set out in the General Conditions.

## WHEN DO WE REGISTER AND USE YOUR PERSONAL DATA?

We register and use data about you to offer you the best advice and solutions, keep your finance safe, fulfil agreements with you, and comply with the legal requirements that apply to us as a financial institution.

This means that we register and use personal data when

- you have made or you are considering making an agreement with us for a service or product, cf. GDPR[1] art. 6.1(b)
- you have granted us consent to use your personal data for a specific purpose, cf. GDPR[1] art 6.1(a)
- it is our legal duty, cf. GDPR art. 6.1(c), for example, in accordance with
  - Law on Banks (Bankų įstatymas)
  - Law on Financial Institutions (Finansų įstaigų įstatymas)
  - Law on the Prevention of Money Laundering and Terrorist Financing (Pinigų plovimo ir teroristų finansavimo prevencijos įstatymas)
  - Law on Payment (Mokėjimų įstatymas)
  - Law on Real Estate Related Credit (Su nekilnojamuoju turtu susijusio kredito įstatymas)
  - Law on Consumer Credit (Vartojimo kredito įstatymas)
  - Law on Markets in Financial Instruments (Finansinių priemonių rinkų įstatymas)
  - Law on Tax Administration (Mokesčių administravimo įstatymas)
  - Law on Documents and Archives (Dokumentų ir archyvų įstatymas)
  - Law on Legal Protection of Personal Data (Asmens duomenų teisinės apsaugos įstatymas)
- it is necessary to pursue a legitimate interest of Danske Bank, cf. GDPR[1] art. 6.1(f). For example, this may be to prevent abuse and loss, to strengthen IT and payment security or/and for direct marketing purposes. We will only do so if our interest clearly outweighs your interest in not having your personal data processed by us.
- when you interact with us as an individual who is connected with a Business Customer of ours, we may also process your personal data for any of the following purposes, depending on the capacity in which you interact with us:
  - Meeting our obligations and providing services and products to our customers
  - Complying with applicable law, including anti-money laundering legislation
  - For administrative purposes, including to secure and maintain our internal systems, platforms and other digital applications
  - Upholding an adequate level of security when you visit our premises
  - Carrying out controls to prevent fraud and financial crime
  - Managing the customer relationship, including marketing of services and products

## WHAT PERSONAL DATA DO WE REGISTER AND USE?

Depending on the services or products you have ordered or are interested in, we register and use different kinds of personal data, including

- basic personal data, e.g. your name, contact information and personal identification code
- financial information, e.g. income, collateral, debt or credit rating
- information about your education, profession or work
- information about your family and household
- your documentary data, e.g. photocopies of identification document, driver's license, birth certificate

[1] Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

- details about the services and products we provide to you, how you use them and your preferences towards them.

### Sensitive data

We register sensitive data only when we need it to advise you on or offer you a product or service. We will seek your explicit consent to register sensitive personal data, cf. GDPR art. 9.2(a), unless we are permitted to register sensitive data without your consent by law cf. GDPR art. 9.2(f), for example when exercising our legal claims. Sensitive personal data we may register includes

- trade union membership information
- information about your health and your genetic background, e.g. inherited health qualities, and bio-metric data, e.g. facial image
- information about your religious or philosophical beliefs

Finally, sensitive data can appear in relation to budget or background information you give us and transactions you ask us to initiate, and which we as a consequence process.

We may also register other personal data if needed to provide you with specific products or services or we are required by law to do so.

Our ability to offer you the best advice and solutions very much depends on how well we know you. Consequently, it is important that the information you provide is correct and accurate and that you keep us updated on any changes.

## WHY AND HOW DO WE REGISTER AND USE YOUR PERSONAL DATA?

We register and use personal data for the provision of financial services and products, including

- payment services
- accounts
- loans and credits
- digital banking solutions
- investment services and advice
- insurance services

We also register and use data for other activities related to the provision of certain services and products, including

- customer care, advice and administration
- credit assessment
- developing and managing our products, services and business, including test our systems
- marketing of our services and products
- setting fees and prices for our services and products
- identifying and verifying our customers
- risk management
- recovering outstanding debt
- protecting you and Danske Bank against fraud
- complying with legal requirements

We collect the information directly from you or by observing your actions, for example when

- you fill out applications and other forms for ordering services and products
- you submit specific documents to us
- you talk to us on the phone. When you call us or when we call you at your request or to follow up on your inquiry, conversations may be recorded and stored due to documentation and security purposes. Before an employee answers the call or before you enter the queue, you will be notified if the call will be recorded. In few situations, e.g. in case of long waiting time, your call can though be redirected to a non-recorded employee without notifying you. If we talk with you about investment services, we are obliged to record and store our telephone conversation.
- you use our website, mobile applications, products and services
- you participate in our customer surveys or promotions organised by us
- you communicate with us via electronic media, including for instance e-mails

## HOW LONG DO WE STORE YOUR PERSONAL DATA?

We keep your data only for as long as it is needed for the purpose for which your data were registered and used. Therefore, we keep your information as long as we are providing a financial service or product to you. When your business connection with us has terminated we normally keep your data for a further 7 years. This is primarily due to our obligations under the bookkeeping regulations and requirements from the Financial Supervisory Authority.

In certain circumstances we keep your information for a longer period of time. This is the case for example:

- if your personal information form part of our calculation of our capital requirements then we may keep your information for up to 20 years,
- if the statute of limitation is 10 years then we may keep your data for up to 10 years,
- if in accordance with the Law on the Prevention of Money Laundering and Terrorist Financing we store copies of the identity documents of the customer, the identity data of the beneficial owner, the identity data of the beneficiary, direct video streaming/direct video broadcasting recordings, other data received at the time of establishing the identity of the customer and account and/or agreement documentation (originals of the documents) for eight years from the date of termination of transactions or business relationships with the customer, and the period may be prolonged for up to additional two years.

## THIRD PARTIES AND YOUR PERSONAL DATA

### Personal data from third parties

We register and use data from third parties, for instance

- Shops, banks, payment and services providers when you use your credit or payment cards, Danske eBanking or other payment services. We register and use the data to execute payments and prepare account statements, payment summaries and the like.
- The State Enterprise Centre of Registers, such as the Real Property Register and Cadastre, the Register of Legal Entities, the Address Register, the Population Register and the Mortgage Register and other publicly accessible sources and registers. We register and use the data, for example to check accuracy of the data.
- Entities of Danske Bank Group (if we have your consent), credit rating agencies and payment default registers. We register and use the data to perform credit assessments. We update the data regularly.
- Entities of Danske Bank Group. We register and use data from their notifications to the Financial Crime Investigation Service under The Ministry of the Interior of the Republic of Lithuania (Finansinių nusikaltimų tyrimo tarnyba prie Lietuvos Respublikos vidaus reikalų ministerijos) in accordance with anti-money-laundering legislation.
- Entities of Danske Bank Group and business partners (including correspondent banks and other banks) if we have your consent or statutory provisions allow. We register and use the data for example to enable you to use banking services abroad.

### Third parties that we share your personal data with

In some instances, we may share personal data with third parties inside or outside Danske Bank Group:

- If you have asked us to transfer an amount to others, we disclose data about you that is necessary to identify you and fulfil the agreement.
- We disclose data about you to public authorities and to other subjects as required by law or according to court orders, on request of the police, the bailiff or other authorities, including to the institutions performing functions of pre-trial investigation, criminal intelligence, intelligence, tax administration, the Guarantee Fund for Depositors and Investors, supervision of personal data processing, supervision of financial market, disputes' settlement between the consumers and financial market participants out of court in accordance with the Law on the Bank of Lithuania, money laundering and/or terrorist financing prevention, if it is necessary for performance of the functions specified in this point; notaries and bailiffs, if it is necessary for performance of the functions of notaries and bailiffs provided for by laws; and other institutions in accordance with the applicable laws.

- We may disclose data with your consent or if permitted under existing legislation internally within the Danske Bank Group and to external business partners (including correspondent banks and other banks).
- We share your personal data with credit rating agencies. If you default on your obligations to Danske Bank, we may report you to credit rating agencies and/or payment default registers in accordance with applicable regulation.
- In connection with IT development, hosting and support, we transfer personal data to data processors, including data processors in third countries outside the EU and the EEA and we do that to Danske Bank India. We ensure that your rights are safeguarded and that the level of protection is maintained in connection with such data transfers by using, for example, standard contracts approved by the European Commission or Danish Data Protection Agency or Data Protection Inspectorate in Lithuania. You can get a copy of the standard contract by contacting us.
- We may disclose your data to other parties to the extent it relates to assignment of claims, our business transfer, merger, acquisition or reorganisation of business in whole or in part or in the process of implementation of similar business changes, including, but not limited to potential or existing business purchasers and their advisers.

## PROFILING AND AUTOMATED DECISIONS

### Profiling
Profiling is a form of automated processing of your personal data that we use. We use profiling and data modelling for among other purposes: to be able to offer you specific services and products that meet your preferences, prevent anti-money laundering, determine prices of certain services and products, detect fraud and fraud risk, evaluate the likelihood of default risk, valuate assets and for marketing purposes.

### Automated decision-making
With automated decision making, we use our systems to make decisions based on the data we have about you. We use automated decisions for example to approve loans or credit cards and to prevent fraud. Automated decision making helps us make sure that our decisions are quick, fair, efficient and correct, based on what we know.

## YOUR RIGHTS

Your rights in relation to personal data are described below. To exercise your rights, you can use any channel to contact us, for example:

- Contact us on our main telephone number (+45 70 12 34 56).
- Contact via email: gdpr_data_subject_rights@danskebank.com

### Insight into your personal data
You can obtain insight into the personal data we registered and use, where it comes from and what we use it for. You can obtain information about for how long we store your data and about who receives data about you, to the extent that we disclose data in Lithuania, Denmark and abroad. Your right of access may, however, be restricted by legislation, protection of other persons' privacy and consideration for our business and practices. Our know-how, business secrets as well as internal assessments and material may also be exempt from the right of insight.

### Manual processing
You can obtain insight into how an automated decision was made and the effects of the decision, and you are entitled to manual processing of any automated assessment.

### Right to object
In certain circumstances, you have the right to object to our processing of your personal information including when we rely on our legitimate interest to process your personal information.

You have the right to object to our use of your personal information for direct marketing purposes, including profiling that is related to such purpose.

### Correction or erasure of Danske Bank's data
If the data is incorrect, incomplete or irrelevant, you are entitled to have the data corrected or erased with the restrictions that follow from existing legislation and rights to process data. These rights are known as the "right to rectification", "right to erasure" or "right to be forgotten".

### Restriction of use
If you believe that the data we have registered about you is incorrect, or if you have objected to the use of the data, you may demand that we restrict the use of these data to storage. Use will only be restricted to storage until the correctness of the data can be established, or it can be checked whether our legitimate interests outweigh your interests.

If you are entitled to have the data we have registered about you erased, you may instead request us to restrict the use of these data to storage. If we need to use the data we have registered about you solely to assert a legal claim, you may also demand that other use of these data be restricted to storage. We may, however, be entitled to other use to assert a legal claim or if you have granted your consent to this.

### Withdrawal of consent
You can withdraw your consent to disclose data that requires your consent at any given time. Please note that if you withdraw your consent, we may not be able to offer you specific services or products. Note also that we will continue to use your personal data, for example, to fulfil an agreement we have made with you or we are required to do so by law.

### Data portability
If we use data based on your consent or as a result of an agreement, and the data processing is automated, you have a right to receive the copy of the data you have provided in an electronic machine-readable format.

## UPDATES

We update this Privacy Notice on a regular basis. In case of a change, the "effective from" date at the top of this document will be amended. Any changes to this Privacy Notice will apply to you and your data immediately. If changes affect how your personal data is processed, we will take reasonable steps to let you know of the changes.

## CONTACT DETAILS AND HOW CAN YOU COMPLAIN

You are always welcome to contact us if you have questions about your privacy rights and how we register and use personal data. You can contact our Data Protection Officer by writing to the:
**Danske Bank A/S**
Holmens Kanal 2-12, DK-1092 København K, Denmark
e-mail: DPOfunction@danskebank.com

If you are dissatisfied with how we register and use your personal data, and your dialogue with the Data Protection Officer has not led to a satisfactory outcome, you can contact our complaints handling unit writing or calling:
**Danske Bank A/S Lithuania branch**
Saltoniškių str. 2, 08500 Vilnius, Lithuania
e-mail: info@danskebank.lt
tel.: +370 5 215 6666
website: www.danskebank.lt

You can also lodge a complaint with the:
**State Data Protection Inspectorate**
L. Sapiegos str. 17, 10312 Vilnius, Lithuania
tel.: +370 5 271 2804, fax: +370 5 261 9494
e-mail: ada@ada.lt
website: www.ada.lt