

# Privacy Notice

SBL Finans AB (publ) with organization number 559106-9785 ("**SBLF**") and SBL Payments AB with organization number 559097-7046 ("**SBLP**") (hereinafter collectively referred to as "**SaveLend**", "**we**", "**ours**" or "**us**") are two subsidiaries of SaveLend Group AB with organization number 559093-5176. SaveLend provides a digital savings platform and payment services that enable individuals and companies to invest in different types of credits. This privacy notice (the "**Privacy Notice**") explains how we process your personal data when you or your company are a customer of ours, when you use our services or when you contact us. The Privacy Notice further explains for which purposes we process your personal data, on which legal bases we support our processing activities, how long your personal data is stored, and what rights you have in relation to your personal data.

We will only collect and process your personal data in accordance with the European Union ("**EU**") General Data Protection Regulation 2016/679 ("**GDPR**") and other legislation in force at the time of processing.

## 1. Definitions

A number of relevant concepts that are recurrent in this Privacy Notice are defined in the table below.

<b>Personal data</b>	Any information that can either directly or indirectly be linked to a natural (living) person.
<b>Processing</b>	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, storage, use, disclosure by transmission, adaption or alteration, restriction or erasure.
<b>Data subject</b>	An identified or identifiable natural (living) person whose personal data is processed.
<b>DPO</b>	Data protection officer.
<b>Controller</b>	A natural (living) or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
<b>Processor</b>	A natural (living) or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

## 2. Whose personal data do we process?

SaveLend process personal data relating to such categories of data subjects defined in the table below.

<b>Investor</b>	A natural (living) person who invests via SaveLend's digital savings platform either for own account or on behalf of the person's company.
<b>Representative</b>	A natural (living) person who has the right to represent a company that has a business relationship with us, for example the managing director or another signatory.
<b>Beneficial owner</b>	A natural (living) person who is the beneficial owner of a company that has a business relationship with us. A beneficial owner is the person(s) who ultimately owns or controls for example a company or an association. A beneficial owner can also be the person(s) who benefits from someone else acting for them.
<b>Person who contacts SaveLend's customer service</b>	A natural (living) person who contacts our customer service.

### 3. Which categories of personal data do we process?

SaveLend process such categories of personal data as defined in the table below.

<b>Identification data</b>	Information such as first name, last name, social security number, investor ID, tax residence and taxpayer identification number (TIN).
<b>Contact details</b>	Information such as address, e-mail address and telephone number.
<b>Profile details</b>	Information such as nationality, citizenship and demographic data.
<b>Economic information</b>	Information such as income and savings, bank account number, clearing number, postal giro number, bank giro number, information about the name of the bank, information about transaction ID:s and transactions carried out through SaveLend, information about available and invested capital through SaveLend, tax residence and taxpayer identification number (TIN).
<b>Device information</b>	Information such as device type, operating system, browser, browser settings, language settings, time zone, platform, screen resolution, IP address or other unique identification of a computer or other device used to utilize our services.
<b>Usage information</b>	Information relating to how you use our services and navigate on our website, such as page response time, download error, how and on what time you reached and left our website, as well as delivery notices when we contact you.
<b>Information from external sanctions lists and PEP-lists</b>	Information from the EU's sanctions lists and lists of so-called "politically exposed persons" (PEP). These lists contain information such as name, date of birth, place of birth, profession or position and the reason why the person is on the list.
<b>Information about your contacts with SaveLend's customer service</b>	Information that may appear in recorded phone calls, chat conversations and email correspondence with SaveLend's customer service.

#### 4. How and why do we process your personal data?

In the table below, we specify the purposes for which we process your personal data, the legal basis for each processing activity, the categories of personal data we process, and for how long we store your personal data for each specified purpose.

Controller	Purpose of the processing	Legal basis	Whose personal data is processed	Categories of personal data	Source	Storage period for the specified purpose
SBL Finans AB (publ)	To create and administer an account on SaveLend's savings platform.	Conclusion and performance of contract (Article 6(1)(b) GDPR).	<ul style="list-style-type: none"> <li>Investor</li> <li>Representative</li> <li>Beneficial owner</li> </ul>	<ul style="list-style-type: none"> <li>Identification data</li> <li>Contact details</li> <li>Profile details</li> </ul>	From you or your company	The personal data is stored until the contract with you or your company has come to an end.
SBL Finans AB (publ)	To acquire and retain customer knowledge and to otherwise fulfill the requirements set out in the Swedish Money Laundering and Terrorist Financing Prevention Act (2017:630).  As a payment institution, SBL Payments AB has an obligation to acquire and retain customer due diligence.	Compliance with a legal obligation (Article 6(1)(c) GDPR).	<ul style="list-style-type: none"> <li>Investor</li> <li>Representative</li> <li>Beneficial owner</li> </ul>	<ul style="list-style-type: none"> <li>Identification data</li> <li>Contact details</li> <li>Economic information</li> </ul>	From you, your company and SaveLend	The personal data is stored in accordance with the Swedish Money Laundering and Terrorist Financing Prevention Act (2017:630) for a minimum of five years and a maximum of ten years from the time the business relationship with you/your company ended.
SBL Payments AB				<ul style="list-style-type: none"> <li>Device information</li> </ul>	From your device	
				<ul style="list-style-type: none"> <li>Information from external sanctions lists and PEP-lists</li> </ul>	From external sanctions lists and PEP-lists	
SBL Payments AB	To provide a payment account and to perform payment services.	Performance of contract (Article 6(1)(b) GDPR).	<ul style="list-style-type: none"> <li>Investor</li> <li>Representative</li> <li>Beneficial owner</li> </ul>	<ul style="list-style-type: none"> <li>Identification data</li> <li>Contact details</li> <li>Economic information</li> </ul>	From you, your company and SaveLend	The personal data is stored until the contract with you or your company has come to an end.
				<ul style="list-style-type: none"> <li>Device information</li> </ul>	From your device	

SBL Finans AB (publ)	To provide direct marketing and offers to you about our products and services.	<p>Your consent (Article 6(1)(a) GDPR).</p> <p>Legitimate interest (Article 6(1)(f) GDPR) if the marketing refers to our own, similar products or services that you have previously purchased.</p> <p>SBLF has assessed that the company's legitimate interest in being able to provide marketing and offers to you regarding the company's products and services outweighs your interest in not having your data processed for this purpose.</p>	<ul style="list-style-type: none"> <li>Investor</li> <li>Representative</li> </ul>	<ul style="list-style-type: none"> <li>Identification data</li> <li>Contact details</li> </ul>	From you or your company	The personal data is stored until you withdraw your consent, or until you object to being contacted for marketing purposes.
SBL Finans AB (publ)	To comply with our legal obligations to provide statements of earnings and deductions on interest income according to the Swedish Tax Procedure Act (2011:1244).	Compliance with a legal obligation (Article 6(1)(c) GDPR).	<ul style="list-style-type: none"> <li>Investor</li> </ul>	<ul style="list-style-type: none"> <li>Identification data</li> <li>Contact details</li> <li>Economic information</li> </ul>	From you or your company and SaveLend	The personal data is stored for seven years after the end of the calendar year in which statements of earnings and deductions were submitted according to the Swedish Tax Procedure Act (2011:1244).
SBL Finans AB (publ)	To comply with our legal obligations according to the Common Reporting Standard (CRS) och Foreign Account Tax Compliance Act (FATCA).	Compliance with a legal obligation (Article 6(1)(c) GDPR).	<ul style="list-style-type: none"> <li>Investor</li> <li>Beneficial owner</li> </ul>	<ul style="list-style-type: none"> <li>Identification data</li> <li>Contact details</li> <li>Economic information</li> </ul>	From you or your company and SaveLend	The personal data is stored for at least five years from when your reportable account was terminated. The personal data is stored in accordance with the Swedish Act (2015:911) on the identification of

						reportable accounts with regard to automatic exchange of information on financial accounts and the Swedish Act (2015:62) on identification of reportable financial accounts due to the FATCA agreement.
SBL Finans AB (publ)	To compile and maintain accounting and reporting in accordance with applicable legislation.	Compliance with a legal obligation (Article 6(1)(c) GDPR).	<ul style="list-style-type: none"> <li>Investor</li> </ul>	<ul style="list-style-type: none"> <li>Identification data</li> <li>Economic information</li> </ul>	From you or your company	The personal data is stored for seven years from the end of the calendar year for which the personal data was registered according to the Swedish Accounting Act (1999:1078).
SBL Finans AB (publ)	To provide customer service.	Performance of contract (Article 6(1)(b) GDPR).	<ul style="list-style-type: none"> <li>Person who contacts SaveLend's customer service</li> </ul>	<ul style="list-style-type: none"> <li>Information about your contacts with SaveLend's customer service</li> </ul>	From you and SaveLend	The personal data is stored until the customer support case has been completed.
SBL Finans AB (publ)	<p>To record what has been communicated and possibly agreed upon between you and our customer service.</p> <p>If you contact our customer service by telephone, we may record the conversation in accordance with the purpose specified above.</p>	<p>Legitimate interest (Article 6(1)(f) GDPR).</p> <p>SBLF has assessed that the company's legitimate interest in being able to record communication you have with our customer service outweighs your interest in not having your data processed for this purpose.</p>	<ul style="list-style-type: none"> <li>Person who contacts SaveLend's customer service</li> </ul>	<ul style="list-style-type: none"> <li>Information about your contacts with SaveLend's customer service</li> </ul>	From you and SaveLend	<p>If you have contacted our customer service by email or chat, your personal data is stored until the contract with you or your company has come to an end.</p> <p>If you have contacted our customer service by telephone, your personal data is stored for 90 days after the recording of the telephone call.</p>

SBL Finans AB (publ)	Administer, respond to and otherwise handle incidents and complaints.	Compliance with a legal obligation (Article 6(1)(c) GDPR).	<ul style="list-style-type: none"> <li>All categories of data subjects mentioned in section 2</li> </ul>	<ul style="list-style-type: none"> <li>All categories of personal data mentioned in section 3 necessary to deal with the incident or complaint in question</li> </ul>	From you, SaveLend, or other sources	Until it is no longer necessary for us to store your personal data for the purpose of administering, responding to or otherwise handling the incident or complaint in question.
SBL Payments AB						
SBL Finans AB (publ)	To exercise our legal rights, comply with our legal obligations and protect ourselves from legal claims.	Legitimate interest (Article 6(1)(f) GDPR).  We have assessed that our legitimate interests in being able to protect ourselves from legal claims and being able to utilize our rights outweighs your interest in not having your data processed for this purpose.	All categories of data subjects mentioned in section 2  In the event of a dispute, we may also collect other types of personal data than those mentioned in section 3 if we need it to safeguard our rights, fulfil our obligations or protect ourselves from legal claims	<ul style="list-style-type: none"> <li>All categories of personal data mentioned in section 3</li> </ul>	From you, SaveLend or other sources	The personal data is stored until we no longer have to keep the data to, for example, fulfill the contract with you or to comply with applicable law.
SBL Payments AB						

## 5. How long do we store your personal data?

The time for which we store your personal data is determined based on the purpose of the specific processing activity (see the table in section 4 above for a description of the specific purposes for which we process your personal data). Below we clarify the criteria we use to determine the storage period.

### The contractual relationship between you/your company and SaveLend

We normally save the personal data used for the contractual relationship between you/your company and SaveLend until the contract comes to an end.

### Comply with legal requirements, guidelines and general advice

In some cases we save your personal data in order to comply with applicable law, guidelines and general advice. We save personal data in accordance with the Swedish Accounting Act (1999:1078) for seven years from the end of the calendar year in which the personal data was registered. We save personal data in accordance with the Swedish Money Laundering and Terrorist Financing Prevention Act (2017:630) for a minimum of five years and a maximum of ten years from the time the business relationship with you/your company ended.

### **Other purpose**

If we do not enter into a contract with you/your company, or if your personal data is not needed to comply with applicable law, guidelines or general advice, we only save your data as long as it is necessary to fulfill the purpose of the specific processing activity.

## **6. Who do we share your personal data with?**

SaveLend may share your personal data with third parties in order to be able to carry out any of the processing activities described in this Privacy Notice.

In the table on the next page we describe whose personal data we may share with which categories of recipients. Furthermore, we describe the purposes and the legal bases for which we share your personal data.

Whose personal data is shared	Category of recipient	Description of recipient	Purpose of the processing	Legal basis
<ul style="list-style-type: none"> <li>All categories of data subjects mentioned in section 2</li> </ul>	SaveLend Group	SaveLend Group AB and its subsidiaries.	For internal administration in order to be able to provide our services and functionalities to you/your company.	Legitimate interest (Article 6(1)(f) GDPR).  We have a legitimate interest in being able to administer your personal data internally in order to be able to provide our services and functionalities to you/your company. The sharing of your data is necessary for us to fulfill that interest, and we assess that our interest outweighs your right not to have your data processed for this purpose.
<ul style="list-style-type: none"> <li>All categories of data</li> </ul>	Suppliers and	Companies that process personal data they	To gain access to services and	Legitimate interest (Article 6(1)(f) GDPR).



subjects mentioned in section 2	subcontractors	receive from SaveLend on behalf of SaveLend.	functionalities from other companies that we cannot offer ourselves.	We have a legitimate interest in being able to access services and functionalities from other companies that we cannot offer ourselves. The sharing of your data is necessary to fulfill that interest and we assess that our interest outweighs your right not to have your data processed for this purpose.
<ul style="list-style-type: none"> <li>Investor</li> </ul>	Agents	A person who has the right to get access to your personal data based on a power of attorney.	To facilitate your contacts with us.	Your consent (Article 6(1)(a) GDPR).
<ul style="list-style-type: none"> <li>Investor</li> <li>Representative</li> <li>Beneficial owner</li> </ul>	Agencies and courts	Financial Supervisory Authorities, Tax Authorities, Police Authorities or other authorities and courts with which we are obliged to share your personal data pursuant to law, regulation, regulation, authority decision or other regulation.	We are obliged to share your personal data according to law, other regulations or an official decision.	Compliance with a legal obligation (Article 6(1)(c) GDPR).
<ul style="list-style-type: none"> <li>All categories of data subjects mentioned in section 2</li> </ul>	Potential buyers	In cases where SaveLend sells businesses or assets, SaveLend may disclose your information to a potential buyer of such businesses or assets.	To enable us to dispose of businesses or assets to potential purchasers of such businesses or assets.	Legitimate interest (Article 6(1)(f) GDPR).  We have a legitimate interest in being able to perform these transactions. The sharing of your data is necessary for ut to fulfil that interest, and we assess that our interest outweighs your right not to have your data processed for this purpose.

## 7. Transfer of personal data outside the EU/EEA

SaveLend cooperates mainly with companies located within the EU or the European Economic Area ("EEA"). However, SaveLend may also transfer personal data to other parties who are located outside the EU/EEA. When personal data are transferred to parties outside the EU/EEA, SaveLend always ensures that essentially equivalent level of protection applies to your personal data as if the transfer was made to a company located in the EU/EEA.

Our transfers of personal data to companies located outside the EU/EEA are either based on a decision from the European Commission stating that the country which the company is located in ensures an adequate level of protection (Article 45 GDPR), or on the application of appropriate safeguards (Article 46 GDPR), in particular standard contractual clauses approved by the European Commission.

More information about the countries which are deemed to have an "adequate level of protection" is available on the European Commission's [website](#).

More information about the measures constituting "appropriate protective measures" is available on the Swedish Authority for Privacy Protection's ("IMY") [website](#).

## **8. Your rights**

### **Right to information**

You have the right to receive information on how we process your personal data. We provide you this information through the Privacy Notice as well as by answering questions from you.

More information about your right to be informed is available at IMY's [website](#).

### **Right of access**

You have the right to know whether we are processing your personal data and to receive a copy of your data in the form of a so-called "register extract". A register extract contains, among other things, information about the categories of personal data we are processing, the purposes for which we are processing your data, the time for which your data will be stored, with whom your data has been shared, and from whom we have received your data. In order to obtain a register extract, please contact us by using the contact information provided in section 9.

More information about your right of access is available at IMY's [website](#).

### **Right to rectification**

You have the right to demand that we, without undue delay, rectify incorrect or incomplete information about you. In order to have incorrect or incomplete information about you rectified, please contact us by using the contact information provided in section 9.

More information about your right to rectification is available at IMY's [website](#).

### **Right to data portability**

You have the right to obtain a copy of your personal data in a machine-readable format if you want to transmit your data to another recipient, provided that we are processing your data in order to fulfill a contract with you or if the processing is based on your consent. If you want to have

your data transmitted to another recipient in a machine-readable format, please contact us by using the contact information provided section 9.

More information about your right to data portability is available at IMY's [website](#).

### **Right to erasure**

You have the right to have your personal data deleted under certain circumstances. For instance, you have the right to have your data deleted if the processing of your data is no longer necessary for the purpose for which we collected your data. Furthermore, you have the right to have your data deleted if you withdraw your consent in relation to a specific processing activity. However, we do not have the possibility to delete your data if your data is still necessary for us to process for the purpose for which it was collected, our interest in continuing to process your data outweighs your interest in having your data deleted, or if we are required to retain your data according to law. If you want to have your data deleted, please contact us by using the contact information provided in section 9.

More information about your right to erasure is available at IMY's [website](#).

### **Right to object to marketing**

You have the right to object to our processing of your personal data if we use your data for direct marketing. You can opt out of receiving marketing from SaveLend at any time by clicking "unsubscribe" in email and SMS communications. Furthermore, you are always welcome to contact us if you want assistance with objecting to marketing from SaveLend. Contact information to SaveLend is available in section 9.

### **Right to restriction**

You have the right to demand that we restrict the processing of your personal data if your data is not accurate, if the processing is unlawful, or if we no longer need your data for a specific purpose. You also have the right to request that we do not process your data while we are checking this, or while we are checking whether you have the right to object to certain processing. If you want us to restrict the processing of your data, please contact us by using the contact information provided in section 9.

More information about your right to restriction is available at IMY's [website](#).

**Right to objection**

You have the right to object to our processing of your personal data based on our legitimate interests (Art. 6(1)(f) GDPR) with reference to your personal circumstances

**Right to withdraw consent**

You have the right to withdraw your consent at any time if we process your personal data based on your consent. In order to withdraw your consent, please use the contact information provided in section 9.

**9. Contact information**

If you have any questions regarding our processing of your personal data or any questions relating to your rights, please contact us at:

Postal address: SBL Finans AB (publ) / SBL Payments AB, Att: DPO, Kammakargatan 7, 111 40 Stockholm, Sweden.

Email address: [dpo@savelend.se](mailto:dpo@savelend.se)

Telephone number: +46 8 400 20 290

**10. Complaint**

If you are dissatisfied with our processing of your personal data, you may submit a complaint to IMY or your local data protection supervisory authority. Postal address: Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm

E-mail address: [imy@imy.se](mailto:imy@imy.se)

Telephone number: +46 8 657 61 00

**11. Cookies**

We use "cookies" on our website. A cookie is a small text file that is sent from our server to your browser. Cookies are used, among other things, to save personal settings. Furthermore, cookies enable us to see what the visitor does on the website. There are two different types of cookies we use on our website, so-called "session cookies" and "durable cookies". Session cookies are used during the time the visitor is active on the website and is only temporarily stored in the visitor's working memory and is automatically removed when the visitor closes its browser. Durable cookies are used to tell the visitor what has been updated on the website since the visitor last visited the site, and to identify returning visitors and save information that was previously provided. Cookies cannot identify you personally, only the browser that was installed on your computer at the

time of the visit.

We produce statistics on the number of visits, the number of times individual pages have been visited, which URLs the visitors come from and which search engines and keywords that are used to enter our website. The purpose of this data collection is to give us an idea of how we can improve our website. The information collected is information about domain names, browsers, operating systems, time when you accessed our website and if you have clicked on any link to access our website. This information is not disclosed to third parties.

## **12. Updates to this Privacy Notice**

This Privacy Notice may be updated due to new legislation, new guidelines and general advice or due to changes in our processing activities. Any changes to this Privacy Notice will be published on our website. Major changes of significant importance will also be notified to interested parties via email and, if required by law, before the changes enter into force.

This Privacy Notice was updated on August 28, 2025.