

Information concerning the processing, by Skandinaviska Enskilda Banken AB (Spółka Akcyjna) – Oddział w Polsce, of employees’ personal data
The General Data Protection Regulation ((EU) 2016/679) (“GDPR”) is designed to protect individuals' integrity from being violated when their personal data is used. An important aspect of the privacy protection is that the person whom the data concerns is informed of how it is being processed.
It is your employer that is the controller of the processing of your personal data. Further down, you will find contact details of the controller and of the data protection officer.
This document explains how your employer processes personal data relating to its employees.
Controller of personal data
The controller of your personal data is Skandinaviska Enskilda Banken AB (Spółka Akcyjna) – Oddział w Polsce with its registered office in Warsaw at ul. Żelazna 51/53 (“Bank”).
It is necessary to process your personal data in order to conclude and perform an employment contract or commission contract between you and the Bank.
Your failure to provide all the required personal data could, depending on the circumstances, be an obstacle or make it difficult to conclude an employment contact or commission contract and/or may prevent you from receiving certain benefits or training.
Giving your personal data is voluntary to the extent to which personal data is collected on the basis of your consent.
Contact details
Should you have any questions regarding the manner and scope of processing of your personal data by the Bank, and also the rights to which you are entitled, please get in touch with the Bank as the controller or with the Data Protection Officer appointed by the controller.
You can get in touch with the controller by writing to Skandinaviska Enskilda Banken AB (Spółka Akcyjna) – Oddział w Polsce, ul. Żelazna 51/53, 00-841 Warsaw, Poland, with a note:”Personal data” or by calling (22) 395 80 00.
You can get in touch with the Data Protection Officer by e-mail to dpopoland@seb.se or by writing to Data Protection Officer, Skandinaviska Enskilda Banken AB (Spółka Akcyjna) – Oddział w Polsce, ul. Żelazna 51/53, 00-841 Warsaw, Poland.
Categories of personal data we process
The Bank processes the following categories of your personal data:
- identification data (e.g. name, surname, PESEL number, series and number of ID card, citizenship, authentication information, IP address, gender information, s-ID, biometric data (fingerprint or facial recognition));
- contact details (e.g. address, telephone number);

- information about the history of employment with other employers and the Bank, about employee appraisals and work results;
- information on education and qualifications;
- information obtained from competency surveys, employee satisfaction surveys or other similar surveys;
- data necessary to hand over work tools (e.g. driving license);
- image captured in a photo taken by the Bank;
- information on salaries and salaries' deductions;
- information on absences from work, including sick leave and accidents at work;
- information related to occupational health care and work safety regulations;
- data of your children and other members of your immediate family, if providing them is necessary to exercise the rights provided for in the labor law;
- information about your life, family and material situation, if it is needed to provide benefits from the Company Social Benefits Fund;
- information used to settle your business trips;
- audiovisual data, such as photos, monitoring recordings or recordings of telephone calls and IT monitoring data;
- information concerning a conviction with a final judgment for offenses;
- information that you provided to us on your own initiative;
- other, when it is necessary to exercise a right or fulfill an obligation resulting from applicable law.

Purposes and basis for processing your personal data

1. The Bank processes your personal data above all in order to:

- a) conclude or perform an employment contract or commission contract concluded between you and us;
- b) fulfil the Bank's statutory obligations, including in particular those resulting from the Labor Code (including the obligation to keep records in matters related to the employment relationship), regulations on social and health insurance, occupational safety and health, employment-related benefits (e.g. the Company Social Benefits Fund), tax law, the Accounting Act, the Banking Act, the Act on Trading in Financial Instruments and the regulatory requirements of such institutions as: Polish Financial Supervision Authority, European Central Bank, European Banking Authority;
- c) obligations other than those stated above (provided one of the circumstances below exists), and which are necessary to carry out the Bank's legitimate interests, including in particular:
 - a) in order to determine claims, pursue them or defend against them;
 - b) for strategic planning and continuity planning, conducting audits, preparing financial statements and other reports and for our internal administrative purposes, including managing personnel and competences, administering training, preparing statistics and internal reports for the Bank and within the SEB Group as well as for improving the management process and internal communication at the Bank (including by publishing the image of employees on the intranet);
 - c) in order to grant authorization to act on behalf of the Bank (power-of-attorneys);
 - d) to ensure the safety of employees and other persons or to protect property in the Bank's facilities, including monitoring in these facilities;
 - e) to prevent and detect crime and abuse and to ensure data security;
 - f) to administer access to computer systems;

g) for the purpose of targeted correspondence, conducting research or evaluation of employees, including testing their competences, satisfaction or for the purpose of conducting other similar research.
2. In other cases, your personal data will be processed on the basis of previously granted consent, to the extent and for the purpose specified in that consent.
Source of origin of personal data
Your personal data has been obtained directly from you or it has been provided from publicly available registers and also from other publicly accessible sources, including from the Internet.
Recipients of personal data
Your personal data may be made available to the following recipients or categories of recipients:
a) public administration authorities and entities performing public tasks or acting on the order of public authorities, to the extent and for purposes arising from applicable law, in particular the Polish Financial Supervision Authority, the General Inspector of Financial Information and the Social Insurance Institution;
b) other entities legally authorized to receive your data on the basis of applicable law;
c) entities supporting the Bank in carrying out the banking activities offered by the Bank;
d) entities or authorities to which this data can be transferred on the basis of consent or authorisation, including in connection with the benefits from the Company Social Benefits Fund, voluntary group insurance, voluntary health care and the use of sports cards;
e) entities entrusted by the Bank with the processing of personal data on the basis of concluded contracts, e.g. IT and other service providers processing data on behalf of the Bank;
f) entities connected with the Bank, including within the SEB group (https://sebgroup.com/about-seb/our-locations), in connection with carrying out reporting obligations, or entities cooperating with entities belonging to the SEB group (including outside the EU/EEA), for strictly specified purposes;
g) customers and contractors of the Bank - to the extent and in the event that disclosing the employee's personal data is necessary for the performance of the service.
Period of processing personal data
Your personal data will be processed:
a) to perform an employment contract or commission contract concluded between you and us - for the duration of the contract and, after its termination, for the period and to the extent required to pursue our possible claims or defend ourselves against any claims (including the limitation period);
b) to fulfill our statutory obligations (e.g. obligation to keep employee records) - until the end of the legal obligation to keep them;
c) to carry out the Bank's legitimate interests as data controller - as long as we have a legitimate interest to process the data or until you object to such processing, if there are no legitimate legal grounds for us to continue to process the data;
d) if we process data on the basis of your consent - until you withdraw your consent.

Your rights
You have the right to access your personal data processed by the Bank. Should any information concerning you be incorrect or incomplete, you will be entitled to access that data and ask for it to be corrected.
You also have the right to:
1. request the removal of your personal data in cases specified in the GDPR;
2. request restricting the processing of your personal data in cases specified in the GDPR;
3. withdraw your consent if the Bank obtains such consent to process personal data (withdrawing consent shall not affect the lawfulness of processing based on consent before its withdrawal);
4. transfer personal data if: (i) processing is done on the basis of an agreement concluded with you or on the basis of consent granted by you, and (ii) processing is done in an automatised manner;
5. object to the processing of personal data, including profiling, if there are reasons connected with your particular situation and data is processed in the public interest or the Bank's legitimate interests, as referred to above.
Transfer of personal data outside the European Economic Area ("EEA") or to international organisations
As we operate internationally, your personal data may be shared to jurisdictions outside of the European Union/ EEA and to international organisations. For all personal data transfers, we will apply the appropriate due diligence and assurance activities to ensure an essentially equivalent level of protection.
For transfers to countries outside EEA or to international organisations for the purposes stated in this document, we will rely on:
1. that the European Commission has decided that there is an adequate level of protection in the country in question;
2. suitable protection measures, such as standard contract clauses;
3. contractual arrangements.
You have the right to obtain a copy of information on the safeguards used for the transfer of your personal data to a country outside EEA or to international organisation by contacting the Bank or the Data Protection Officer (contact details are indicted above).
Right to lodge a complaint with a supervisory authority
If you believe that the Bank's processing of your personal data breaches the GDPR, you have the right to lodge a complaint with the appropriate supervisory authority i.e. President of the Personal Data Protection Office.
Automated decision making, including profiling
Your personal data will not be subject to automated decision making or profiling.

Changes and updates to this document
If any changes are made to this document, for example due to new or amended processing activities, the latest version can be found on our website https://sebgroup.com/about-us/our-business/our-locations/seb-in-poland/information-concerning-the-processing-of-personal-data

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