



Privacy Policy of Sumo

Banking services via Sumo are provided by Ferratum Bank p.l.c. and available exclusively through Thomas Cook Money.

1. General

Sumo is a mobile application (**Sumo** or **Sumo Mobile App**) provided by Ferratum Bank p.l.c. and available exclusively through Thomas Cook Money.

All information regarding the services of Sumo are published on the webpage of Sumo www.sumomoney.se.

Banking services via Sumo are offered by Ferratum Bank p.l.c. (hereinafter referred as **Bank** or **Ferratum Bank**). Customers who are using the banking services which are available via Sumo will enter into a contractual relationship with Ferratum Bank p.l.c., which means your data will be processed by the Bank, as the data controller.

We understand and respect the importance of your privacy. We ensure the privacy of all those visitors who visit Sumo website (www.sumomoney.se), try the demo version of Sumo Mobile App or use Sumo Mobile App. This Privacy Policy sets out the basis on which any personal data we collect from you, or that which you provide to us, via Sumo or any other method, will be processed.

Ferratum Bank ensures the confidentiality of all data entrusted with the Bank by its Customers who avail themselves of Sumo.

Please read the following information carefully which details some of the precautions you may adopt to protect your privacy as well as providing you with all necessary information about the processing of your personal data.

2. The purpose behind collecting personal data

The Bank collects, processes, uses and holds personal data of all users of the Sumo Mobile App and Sumo Customers (hereinafter together **Users**), this for the purpose of providing Users with the requested banking services and to be better able to improve upon the products and services which are currently provided you with.

3. The legal basis for collecting and processing personal data

In accordance with the provisions of the Data Protection Act, Chapter 440 of the Laws of Malta, and the relevant EU directive the 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 (hereinafter **GDPR**), which governs Ferratum Bank's practices, your personal data is collected and processed on the basis of the following legal grounds:



- the freely given, specific, informed and explicit consent of the Customer to the processing of his/her personal data for one or more specific purposes (e.g. for marketing purposes and for carrying out market research, preparing statistical studies and analyses of customer groups, market shares of products and services and other financial indicators, as well as reporting and risk management in order to better understand the customer's expectations and develop our models, products, services and processes);
- processing is necessary for the performance of the contract to which the Customer is party or in order to take steps at the request of the individual prior to entering into a contract. This includes properly identifying you and performing credit and risk checks and assessments on you in order to determine whether and on which conditions to conclude the contract;
- processing is necessary for compliance with legal obligations which Ferratum Bank is subject to as a data controller. Ferratum Bank's legal and regulatory obligations include, but they are not limited to, those obligations deriving from the applicable laws and regulations which regulate credit institutions, such as duties to report to regulators, anti-money laundering (AML) and terrorist financing rules and regulations to properly identify the customer (KYC) and ensure the proper checking of your identity and creditworthiness;
- processing is necessary for the purposes of the legitimate interests pursued by the Bank To this respect, data processing may also include: (i) checking your identity and your creditworthiness; (ii) collecting amounts due by you to Ferratum Bank; and (iii) safeguarding Ferratum Bank's rights establishing, exercising and defending legal claims.

4. What kind of data and information do we collect and how long will it be kept?

4.1. Data collected when visiting Sumo Website and/ or when using the demo version of Sumo

If you visit the Sumo website purely for informational purposes, we shall not collect any of your personal data. Thomas Cook Money Limited may collect the information described in the Cookies section below and can ask your consent for marketing purposes for itself.

If you download Sumo Mobile App, Ferratum Bank will collect the personal data about you, including: (name, surname, mobile number, email address, country of residence, username and password). During this process you should read and accept our relevant Terms of Use which contain the detailed rules of the first phase of your onboarding process.

4.2. Data collection in relation to banking services

4.2.1 In accordance with the provisions of the GDPR, if you use Sumo mobile app to be provided with banking services, Ferratum Bank shall process your personal data only to the extent is necessary to enable us to provide you with the required and best service. Depending upon the respective Service (e.g. current account, overdraft, savings account including savings goals and term deposit), the following types of personal data could be processed:



- Identification Data (e.g. your name, personal identification code, date of birth, place of birth, nationality, information about and copy of identification document, results of face/ID recognition, voice, picture, video, signature, address);
- Contact Data (e.g. your address, phone number, e-mail address, language of communication);
- Bank Data (e.g. bank ID, name of bank, account holder, account number, transaction information from your bank account);
- Financial Data (e.g. monthly income, monthly housing costs, other monthly costs, monthly costs to other loans, total amount of monthly expenses, monthly balance);
- Data concerning origin of assets (e.g. data concerning employer, transaction partners, business activities and actual beneficiaries, data showing the source of your income and wealth);
- Data concerning creditworthiness (e.g. data concerning payment behaviour, damages caused to Ferratum or other persons, data that enables Ferratum to perform its due diligence measures regarding money laundering and terrorist financing prevention and to ensure the compliance with international sanctions, including the purpose of the business relationship and whether the Client is a politically exposed person);
- Data obtained when performing an obligation arising from the law (e.g. information received from enquiries submitted by investigative bodies, notaries, tax authorities, courts and bailiffs);
- Communications Data (e.g. e-mails, phone call recordings);
- Data inserted to log-in your online account;
- Data related to the services (e.g. performance of the Contract or the failure thereof, transactions history, submitted applications, requests and complaints).

4.2.2. Telephone conversations with you may be recorded to allow our efficient monitoring of customer satisfaction levels and to resolve your complaints. These records will be stored for the duration stipulated by law. You can find further information on the records concerning telephone conversation, by referring to the table below:

Purpose	Archiving period
Resolve complaints	6 years from the date when the complaint was resolved
Quality control monitoring	5 years from the date of the record
Collection	2 years from the date of the record

5. Direct Marketing

We process your personal data also for marketing purposes only if you have given us your explicit consent, which can also be provided electronically. You can revoke your consent at any time with effect for the future without reason and without incurring any costs.

Ferratum Bank via Sumo and / or its partners may send marketing materials, promotions you have chosen to receive such materials. We send these marketing materials and promotions via email, SMS, phone, social media or the Sumo mobile app.



We may use your personal information (e-mail address and/or mobile phone number) obtained from the Sumo Mobile App to send communications and promotional information about the Bank's products and/or services and the services of our collaboration partner (be it through conventional methods, e-mail, and/or SMS or MMS), this on the basis of your consent being provided.

You have the right, at any time, to request not to receive marketing communications by writing to or calling us at:

FERRATUM BANK PLC
ST Business Centre,
120 The Strand,
Gzira GZR 1027, Malta
e-mail: customersupport@sumomoney.se
Telephone: +46 20787680

If you wish to opt out of receiving any marketing material from Ferratum Bank via Sumo you can do so easily electronically or via other communication channels. The opt-out clause and link is included in every outgoing message. The sender's identity will never be disguised or concealed.

Where you object in any above-mentioned form to processing for marketing purposes, your personal data shall no longer be processed for such purposes and we shall inform our partners accordingly.

Please, note that withdrawing consent does not affect the lawfulness of processing based on consent before its withdrawal.

All of our staff are responsible for maintaining customer confidentiality, and all third parties engaged by the Bank, such as our cooperation partners and service providers, are legally bound to keep all personal information confidential.

6. Disclosure of personal data to third parties

We disclose any of your personal data collected via Sumo Mobile App with third parties (i) if required under the applicable law (e.g. when Ferratum Bank is obligated to share personal data with the authorities), particularly to protect the integrity of Sumo mobile app and to assist Governmental bodies, enforcement agencies, and/or regulators in their investigations or any investigations regarding public safety, provided that such disclosure will be only granted under proper authority; or (ii) with your consent.

In case under (ii) above Ferratum Bank shall not disclose your personal data to third parties for any other purposes, such as market research or other types of marketing.



Ferratum Bank does not provide third parties with any information regarding your financial details unless obliged to do so by law or with your specific consent.

7. Transferring personal data outside the EEA

Ferratum Bank transfers personal data to Ferratum Group entities and other recipients' entities which are our service providers (including provide access to personal data from) outside the European Economic Area, e.g. to Australia, Brazil, USA, Canada, India, Switzerland, India, Japan, Singapore, Philippines. This includes providing access to personal data from such countries. However, we do so only where it has a lawful basis to do so, including to a recipient who is: (i) in a country which provides an adequate level of protection for Personal Data; or (ii) under an instrument which covers the EU requirements for the transfer of Personal Data outside the EU.

You can receive further details on the transfers of personal data outside the EU upon contacting Ferratum Bank on the contact details below.

8. Data retention

Ferratum Bank retains your personal data in accordance with industry guidelines for as long as necessary for the purposes for which the data was collected or for as long as necessary to safeguard our rights or for as long as required by applicable legal acts. Please, note that if the same personal data or is processed for several purposes, the personal data will be retained for the longest retention period applicable.

In accordance with the maximum limitation period from EU directive on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, Ferratum Bank shall retain any personal data related to such legal obligation for 5 years, in compliance with the applicable local law implementing the AML directive above, from the date your relationship has been terminated, or a suspicion was filed, whichever is the latest;

If you onboard and open a bank account via videoconferencing, audio from a videoconference shall be recorded for compliance and anti-money laundering purposes. In this case the audio records and your personal data therein will be stored for a period of 5 years from the termination of your contract with Ferratum Bank in accordance with the provisions of the Prevention of Money Laundering Act, Chapter 373 of the Laws of Malta.

In accordance with the maximum limitation period for claims arising from a transaction if the obligated person intentionally violated the person's obligations and for claims arising from law, Ferratum Bank shall retain any personal data related to such civil claims for a maximum of 2 years, whether such civil claims are not arising from a criminal offence, or for the maximum period of time by which the relevant action is barred from the criminal law, whether such civil claims are arising from a criminal offence, starting from the date when the claim falls due.

9. The Customer's rights in relation of the data proceeding

You shall be granted, to the extent permitted by the applicable laws and regulations with the rights specified here below in respect to your personal data:

- a) **to get transparent information**, including this Privacy Policy, which aims to provide you with all relevant information relating to our data processing in a concise, transparent, intelligible and easily accessible form, using clear and plain language;
- b) **right to access**, which means you have the right to obtain from Ferratum Bank confirmation as to whether or not personal data concerning you is being processed and you can have the list of this personal data;
- c) **right to rectification**, which means Ferratum Bank is obliged to correct your inaccurate personal data. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed. Please note that you are kindly requested to inform us without undue delay about any changes to your personal data;
- d) **right to erasure ('right to be forgotten')**, you have the right to obtain from Ferratum Bank the erasure of your personal data without undue delay. Please note there are different legal obligations based on acts which shall be fulfilled by Ferratum Bank. This means e.g. your identification related personal data shall not fall within the scope of this right;
- e) **right to restriction of processing**, you are entitled to ask Ferratum Bank to restrict data processing if you are contesting the accuracy of your personal data held by the Bank, this until the accuracy of the data is verified;
- f) **right to data portability**; it means you have the right to receive your personal data which you have provided to us, in a structured, commonly used format and have the right to transmit that data to another controller without hindrance from us to which the personal data have been provided is processing is based on your consent, or on contract and the processing is carried out by automated;
- g) **right to object**, means that you have the right to object, on grounds relating to your particular situation, at any time to us processing your personal data if the processing would be necessary for the purposes of the legitimate interests pursued by us or by a third party; you are entitled to object at any time to the processing of your personal data for direct marketing, which includes profiling.

Should you believe that your rights have been violated, you have the right to lodge a complaint with:

- our Customer Support Service or
- our Data Protection Officer or;
- the Office of the Information and Data Protection Commissioner or;
- the courts should you believe that your rights have been violated.



10. Changes to this Privacy Policy

Should the personal data processing practices of Ferratum Bank change or should there be a need to amend these principles under the applicable law, case-law or guidelines issued by competent authorities, Ferratum Bank is entitled to unilaterally amend these principles at any time. In such case, Ferratum Bank will notify you by e-mail no later than one month prior to the amendments entering into force.

11. Enquiries and Contact

If you are not satisfied with the information regarding the data protection measures presented in this policy, or if you have any questions regarding the collection, processing and / or use of your personal data, please contact us. We will endeavour to answer your questions as soon as possible and to implement your suggestions. Please contact us by post, e-mail or telephone at:

Mailing address:
Ferratum Bank plc
ST Business Centre
120 the Strand
GZR 1027 Gzira, MALTA
Telephone: +46 20787680
E-mail: customersupport@sumomoney.se

Ferratum Bank has appointed a data protection officer whom you also may contact regarding the same on the following contact details:

dpobank.se@ferratumbank.se.

Cookies

Kindly note that the Sumo website uses cookies.

The Sumo website is provided by Ferratum Bank p.l.c. and operated by Thomas Cook Money Limited ("TCM"). TCM may collect information through cookies as described in this cookies section.

(i) What is a cookie?

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

(ii) Why are cookies used?

The Sumo website uses cookies to distinguish you from other users. Some of these cookies are essential to make the Sumo website work properly, and to enable us to fulfil your requests. Other types of cookie help TCM to provide you with a better experience when you browse the Sumo website or the way Sumo is provided to customers. Cookies may also be used to provide you with



information or offers from Ferratum Bank or Thomas Cook companies or third parties that may be of interest to you in compliance with the rules set out in this policy.

(iii) Types of cookies

The Sumo website uses the following cookies:

Category	Type	Description	Name	Purpose	Lifetime
Advertising and Marketing	DoubleClick	These may be set from a few different domains, including google.com, doubleclick.net, googlesyndication.com, or googleadservices.com, or the domain of our partners' sites. Some of our advertising products enable our partners to use other services in conjunction with ours (like an ad measurement and reporting service), and these services may send their own cookies to your browser. These cookies will be set from their domains.	id	Registers a unique ID that identifies a returning user's device. The ID is used for targeted ads. Sometimes, cookies contain an additional identifier seemed to cookies' ID, such identifier is used to identify an advertising campaign which has been sent to a specific user but DoubleClick does not keep personal data information in the cookie.	Expires after 2 years
			DSID	Used by Google DoubleClick for re-targeting, optimisation, reporting and attribution of online adverts.	Expires after 1 hour
		These cookies are used to allow us to track the adverts that users click on to reach the website and assist us in showing you customised adverts when you visit other websites. You can find more information about this type of advertising at www.youronlinechoices.com where you can also find information about how to control your online behavioural advertising preferences and options to turn off behavioural advertising for individual companies (Please note turning off behavioural advertising will not stop you seeing	IDE	These cookies allows for relevant advertising, based on your visit to our website, to be displayed on other websites.	Expires after 2 years

		<p>advertisements online or stop cookies being used. You should follow the instructions at www.aboutcookies.org to adjust the privacy settings on your web browser if you wish to turn off cookies).</p> <p>The DoubleClick Floodlight Counter tag allows Thomas Cook Money to count the number of times that users have visited a particular page after seeing or clicking one of their ads.</p> <p>DoubleClick uses cookies to improve its advertising. Normally it is used to guide advertising according to relevant contents for users, improve campaign performance reports and avoid advertising that user has seen before. DoubleClick's cookies do not contain information about personal data.</p>			
Analytics	Google Analytics	<p>These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. Understanding how customers use our website, enables us to identify what needs to be improved on the website to better serve our customers. Read about Google privacy overview at</p>	_ga	This cookie is used by google analytics to distinguish users on the website.	Expires after 2 years
			_gid	This cookie is used by google analytics to distinguish users on the website.	Expires after 24 hours
			__utma	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.	Expires after 2 years from set-up or update

		https://support.google.com/analytics/answer/6004245 .	__utmb	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.	Expires after 30 minutes from set-up or update
			__utmc	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.	Session based cookie that expires when your session ends or you leave our site.
			__utmv	Used to store visitor-level custom variable data. This cookie is created when a developer uses the _setCustomVar method with a visitor level custom variable. This cookie was also used for the deprecated _setVar method. The cookie is updated every time data is sent to Google Analytics.	Expires after 2 years from set-up or update
			__utmz	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.	Expires after 6 months from set-up or update

The Sumo website may contain references to other websites which use their own privacy and cookie policies. We recommend that you familiarize yourself with each of these policies as we shall not assume any responsibility for the practices of these sites.

You may disable cookies in your browser configuration, however you may then be unable to use some or all, of the services.



Use of Adjust in Sumo Mobile App

The Sumo Mobile App uses the Adjust usage statistics and analysis technology of adjust GmbH, Saarbrücker Str. 36, 10405 Berlin (hereinafter: "**Adjust**"). When you launch the Sumo Mobile App, Adjust collects installation and event data such as 'app downloaded from iOS and Android mobile' in order to help us to understand how users are interacting with our app and to optimize and analyse mobile ad campaigns. For such analysis, Adjust uses your anonymized (hashed) IDFA or Google Play Services ID, and your anonymized (hashed) IP- and MAC address. The hashes used are one-way hashes and it is not possible to identify you or your mobile device individually.

Use of Salesforce Live Agent

SalesForce Live Agent is a service rendered by Salesforce.com Inc., The Landmark at One Market, Suite 300, San Francisco, CA 94105, United States that is utilised in order to connect the Sumo Mobile App Customers with the customer support centre. While processing the chat session, the Live Agent uses cookies and collects the full name as personal data of the Sumo Customer. Furthermore, it is collected the Customer's location and referring website (from which the request comes), IP address, date -start and end time of the request, content of the request, browser and the language and version of it, OP system, the generated ID number of the Customer.

Further relevant information can be found in Salesforce privacy policy at: https://www.salesforce.com/company/privacy/full_privacy.jsp