

Saverium.es Privacy Policy

This Privacy Policy governs the way LVS Brokers Oy (“LVS Brokers” or “we”) processes personal data collected from users (“User” or “you”) of the consumer loan comparison services provided by LVS Brokers through the Saverium.es website as well as of the other users of the Saverium.es website (website and services both the “Saverium”).

By using Saverium to apply for a loan, you authorize LVS Brokers to request one or several consumer loan offers on behalf of you from the banks and other creditors (“Lender”) cooperating with LVS Brokers.

Please note that this Privacy Policy only applies to your use of Saverium and the processing of personal data by LVS Brokers. Before you use the loan/credit and other services of the Lenders, we encourage you to read their privacy policies as they may differ from ours.

The controller of the personal data of the Users of Saverium is LVS Brokers.

Contact information:

LVS Brokers Oy
PL 644
FI-00101 Helsinki
Finland
<https://www.saverium.es>
Client Service: info@saverium.es
Business ID in Finnish Trade Register: 2521965-8

Sources of Data

By submitting a loan application and expressing your consent by marking relevant checkboxes in the loan application you authorize us and the Lenders to process the information you have submitted to us in your loan application, as well as you authorize Lenders to request, in accordance with applicable law, further information from third-party registers required to assess and verify your application.

Data Collected

We collect and process the data submitted in the loan application or in other forms available on the Saverium for the purposes described below and in accordance with applicable law, in particular with provisions of the Act of 29 August 1997 on Personal Data Protection (consolidated text: Official Journal from 2016 item 922), in particular we process the following data:

- First and last names and mother’s maiden name
- Personal identification number (DNI/NIE)
- Identity card number
- Address
- Telephone number(s)
- Email address
- Citizenship
- Marital status
- Number of dependants
- Employment
- Profession
- Bank accounts
- Previous loans and credits
- Bank and credit cards
- Credit history and information
- Revenue and expenditure data
- Type of loan applied for
- Direct marketing opt-outs and opt-ins
- Financing products and loans applied for

Payment defaults

We may collect browsing data from the Users' browsers whenever they interact with Saverium. Browser data may include the browser name, the type of computer, the time and date of user visits, IP address, operating system and the Internet service providers utilized and other similar technical information. Although we do not normally combine the browser data with your personal data, you can sometimes be recognized from it.

Purposes of processing

Your personal data is processed for the purposes of providing Saverium, being consumer loan intermediary service, which includes searching for the appropriate loan offers, presenting the Lenders' offers to Users and for the purposes of providing the Lenders with the data they require to assess your loan application.

Further, we may use the Users' personal data for the following purposes:

- For customer service
- For maintaining customer accounts in Saverium
- Identification / Know your client
- Verifying that the provided loan application information is correct
- To send newsletters and text messages concerning our products and services
- To personalize user experience and to develop Saverium
- User analytics and statistics
- Marketing of our products and services via email, text message, mail, phone, and other means
- To comply with statutory requirements applicable to us

Also, we may use the Users' personal data to send the User emails and text messages that may include e.g. news relating to Saverium and related information concerning our services. We make sure that commercial information delivered via electronic communications means and with the use of terminal telecommunication devices, in particular via emails or mobile phones will be sent to Users only upon obtaining User's separate, prior, voluntary and revocable consent to receive commercial information via such means.

If at any time the user would like to unsubscribe from receiving future emails containing commercial information, we include detailed unsubscribe instructions at the bottom of each email.

We may use the Users' personal data for the purpose of marketing of third parties' services via e-mail, text message, mail, phone and other means only upon the User's separate, prior, voluntary and revocable consent to for such processing via such means.

We may use Users' personal data for the purpose of personalizing user experience and developing Saverium and for the purpose of user analytics and statistics only upon the User's separate, prior, voluntary and revocable consent for such processing.

We store personal data only as long as necessary for the purposes set out in this Privacy Policy or as necessary for complying with the laws and regulation applicable to us. Once the data is no longer necessary, we delete it as soon as possible. Note that we might be required by law to store your data after the termination of your agreement with us, *inter alia*, under "know your client" regulation as well as under regulation relating to the prevention of financing of terrorism and money laundering.

All Users' personal data will be processed according with applicable law, in particular with provisions of the Finnish Act of 29 August 1997 on Personal Data Protection.

Visiting Saverium website does not itself entail collecting your personal data, unless you agree to disclose such information to us voluntarily (e.g. by filing loan application). Submission of Users' personal data is voluntary but necessary for the purpose of providing our Saverium services. Not submitting the requested data may make it impossible to further process your loan application or present you with the offers of the Lenders.

Data Disclosures

We may share information regarding the Users with the Lenders for the purposes outlined above strictly on a need-to-know basis.

Upon User's separate, prior, voluntary and revocable consent we may share the information regarding the User with our white label partners,

We may use third party service providers to enable us to provide Saverium or administer Saverium related activities on our behalf, such as providers of information technology systems and services. We may share your information with these third parties only for those limited purposes.

We may disclose personal data to public authorities if we are legally required to do so.

We may also transfer or assign your information to our group companies, subsidiaries and affiliates as well as to a subsequent or new owner/operator of Saverium in case Saverium, we, our stock and/or assets are acquired or in case of merger, restructuring, bankruptcy, or other corporate reorganization

We may process or transfer your personal data in and to any country where we operate or where we have employees or service providers, including countries outside the European Union or the European Economic Area. Such processing, transfer and assignments will be carried out in compliance with applicable law. In cases where the level of data protection may not be deemed adequate by the European Commission, we always, by applying contractual and other measures, ensure that adequate protection for your personal data is provided as required by applicable laws, for example by using the Model Contracts for personal data transfers to third countries of the European Commission. If you wish to know more about international transfers of your personal data, you may contact us via the contact details given above.

Data Security

We have taken both industry standard technical and organizational preventive measures and apply multiple layers of security procedures to restrict access to your personal data and to protect it against loss, misuse and unlawful alteration. The personal data you submit to Saverium is SSL encrypted. Selected and authorized employees have access to the personal data files of LVS Brokers strictly on a need-to-know basis. All of our contractors (including the Lenders) are obliged to apply industry standard data security measures when processing your data on behalf of us. Other measures include, where appropriate, firewalls, secure facilities and access control systems.

Your Rights

You have the right to know what personal data we are processing about you by sending us a written request to the address indicated above. By request, we will provide such data in a common and machine-readable format, in case possible.

You also have the right to have incorrect/unprecise, incomplete, outdated, or unnecessary personal data we have stored about you corrected, completed or deleted by contacting us on the address indicated above. In case you consider your personal data collected by us to be inaccurate, you do not wish your personal data to be erased in a case where the processing of your personal data has been deemed unlawful or the personal data is no longer necessary, or you have objected to the processing and the existence of legitimate grounds for processing are being verified, you may request restriction of processing of your personal data.

You have the right to withdraw your consent to receive electronic direct marketing communications from us by clicking on the opt-out link provided in all marketing communications we send you, and choosing not to receive marketing communications from us in the future. You also have the right to prohibit us from using your personal data for direct marketing purposes, market research and profiling by contacting us on the addresses indicated below. In case your personal data is processed based on your consent, you have the right to withdraw your consent for such processing at any time, by sending us a request on the address indicated above.

Please note that in case you prohibit us from processing your personal data, we may not be able to continue to provide Saverium to you.

In case you consider our processing activities of your personal data to be inconsistent with the applicable data protection laws, you may lodge a complaint with the Supervisory Authority for Data Protection (GIODO).

Cookie Policy

Saverium may use “cookies” and other industry standard technologies like pixel tags, web beacons and local shared objects (flash cookies) to enhance user experience, in particular to improve our website services.

A cookie is a small text file that is stored on a User's device for record-keeping purposes which contains information about that User's behavior (used browsers, visited websites etc.). Pixel tags and web beacons are tiny graphic images placed within Saverium allowing us to determine whether you have performed a specific action.

Saverium may also contain advertisements served by third parties that deliver cookies to your device (“third party cookies”) so your online activities across third-party sites or online services can be tracked for advertising purposes. These third-party services are governed by separate privacy policies.

Cookies files are used within Saverium for the following purposes:

- a. adjusting the contents of Saverium to the preferences and needs of the Users and optimizing the use of the services; in particular recognizing User's device and ensuring a proper display of Saverium websites;
- b. recognizing and understanding ways of using Saverium by its Users and visitors, creating statistics, in order to improve the structure and contents of Saverium;
- c. maintaining the User session after logging in, in order to avoid the necessity of entering by User its login and password each time;
- d. providing advertising content better suited to User's preferences.

On Saverium, we use the following type of cookies:

- “persistent cookies” – these are the cookies which remain stored in the User's terminal device until they are removed by the User or until they reach an expiration date (defined in the cookies files parameters);
- “session cookies” – these are the cookies which are automatically deleted when the User closes his/her browser, switches of the device, or logs out from the website which uses these cookies;
- “third party” cookies – these are the cookies of the entities cooperating with LVS Brokers. These cookies allow to adjust the advertising to the preferences and behavior of the Users or allow to measure the effectiveness of the advertising activities.

You may choose at any time to set your web browser to automatically block cookies, delete them or to alert you when cookies are being placed on your device. If you do so, note that some parts of Saverium may not function properly. For more specific information about cookies and how to manage them (e.g. delete or block them) please visit the website of the relevant browsers (eg. Firefox). Note that you may prevent local shared objects from being stored by following the instructions provided by Adobe at <http://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html>.

Saverium uses Google Analytics, a web analytics service provided by Google, Inc. to compile reports on visitor usage and to help us improve Saverium. For an overview of Google Analytics, please visit <http://www.google.com/analytics/>. You can opt-out of Google Analytics with this browser add-on tool: <https://tools.google.com/dlpage/gaoptout> .