Affiliates Guidelines - Norway Version 1.0 - 22.10.2021

All those who advertise commercially in Norway must comply with Norwegian laws and regulations. It is important that you know and understand the rules and regulations in order to be fully compliant.

In this document we have listed the rules and regulations you must comply with and we will give some examples of what would be considered non-compliant advertising under Norwegian law. This is not intended as an exhaustive list, but we hope to cover the main pitfalls that should be avoided when drafting your advertisements.

The laws and regulations *concerning affiliates* that Forbrukertilsynet is focusing on in the letter:

- Punkt 2.1 in the letter: <u>Markedsføringsloven § 6 og § 7</u>, *Urimelig handelspraksis* og *Villedende handlinger*. Everyone who advertises in Norway fall under this act, regardless of industry.
- Punkt 5.1 in the letter: Personopplysningsloven artikkel 6 privacy and consent
- Punkt 6 in the letter: <u>Markedsføringsloven paragraf 15</u> the limitations in direct marketing (SMS, email etc). Forbrukertilsynets guidelines; <u>Forbrukertilsynets</u> <u>veiledning om markedsføring via e-post, SMS o.l.</u>

Other laws and regulations concerning affiliates:

Regarding both your marketing and websites, you need to be compliant with § 46 i Finansavtaleloven, Forbrukertilsynet have issued a guideline; Veiledning til finansavtaleloven § 46 – krav til opplysninger ved markedsføring av lån og kreditt to help companies understand the law.

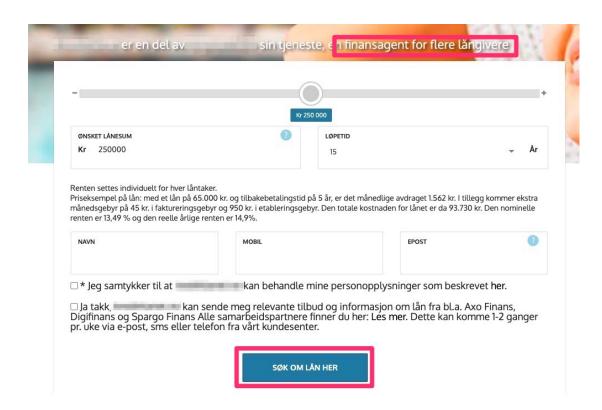
You also need to know <u>Kapittel 2</u> of the act, which concerns commercial practices toward consumers and the <u>Forskrift om markedsføring av kreditt</u>. Forbrukertilsynet have made guidelines <u>Veiledning til forskrift om markedsføring av kreditt §§ 4 og 5</u> for you to understand the rules.

As outlined in the letter issued by Forbrukertilsynet, it is important that you **do not mislead** the consumer about your *role in the transaction* or your *level of competence*. Forbrukertilsynet regularly conduct reviews of the financial market and will take action against any non-compliant financial advertisements. Read the letter again HERE.

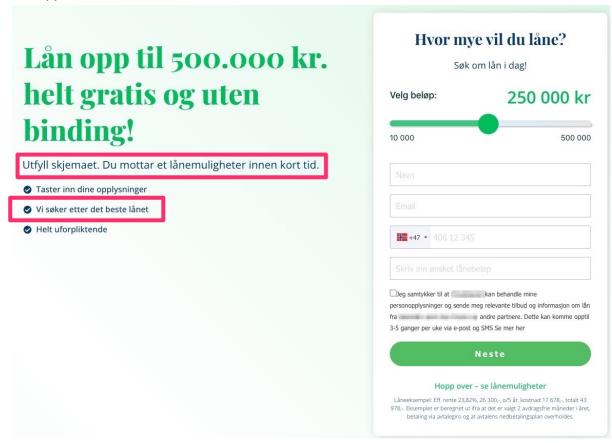
We are not in a position to approve your changes in accordance with the laws and regulations outlined, but as Forbrukertilsynet is writing in the letter, you are welcome to contact them; kh@forbrukertilsynet.no

SITES:

You cannot give the impression that you are a broker/agent/bank or financial institution: For example to say "Søk lån her" implies that the customer is submitting an application to a loan provider, which is misleading.



It is also misleading to give the impression that the info gathering form is the start of a loan application. A possible solution here would be to add a disclaimer stating that this is not a loan application.



As an affiliate you cannot present any loan offers for any customers. You can only present options or alternatives

kan hjelpe deg med å finne et lån

Hvordan virker det





ADS:

Misleading about what you can actually do/get



It's not up to an affiliate to decide how much a customer can borrow



Don't have the phrase "start søknad her" as the customer wont start his/her application on an affiliate site



EMAILS/SMS:

Customers don't submit applications through affiliates, so it is misleading to say that you can



The same rules goes for emails; you cannot be misleading about who you are and what you do.

It is misleading to say you have a "personal loan offer", as it's neither personal or a loan offer



KEY INFO:

We would also like to remind you of some key information about Axo Finans.

Remember; It is your responsibility to make sure you have the right information on your site as displayed on axofinans.no at all times.

Interest example:

Nom. 4.9 til 23.4 --> Eff. 5.11 til 20.54

Nominell rente fra 4,90% til 23,40%. Eksempel: Nominell rente 11,9%, eff. rente 13,7%, 100.000 o/5 år, kostnad 35.858, totalt 135.858.

Generell: Eff. rente 13,7%, 100.000 o/ 5 år, kostnad 35.858, totalt 135.858.

På site:

Bankene innvilger fra 4,90% nominell rente. Nom. 11,9%, eff. 13,7%, 100.000 o/ 5 år, kostnad 35.858, totalt 135.858.

Address:

St. Olavs Gate 28, 0166 Oslo

Customer service opening hours:

Mandag - Fredag: 08:00-21.00 **Lørdag-Søndag**: 10.00--16.00

Axo Finans samarbeider med 23 banker