

## **Privacy Statement ING BANK N.V, MANILA BRANCH**

### **General**

This privacy statement provides information about the processing of personal information<sup>1</sup> by ING BANK N.V., MANILA BRANCH ('ING').

ING does its best to ensure that the processing of your personal information is carried out in such a way that your privacy is protected and safeguarded. ING processes personal information in accordance with the data protection laws and regulations applicable to it.

### **Individuals of whom ING processes personal data**

ING processes personal information of individuals including, but not limited to, individuals:

- who are (potential) clients, business partners or suppliers of ING;
- who are acting in their capacity of shareholder, ultimate beneficial owner, employee, (managing) director, authorised representative or contact person of clients, business partners or suppliers of ING;
- who are visitors of ING's websites;
- of whom ING processes personal information in the framework of its financial transaction processing and handling without having a contractual relationship with them such as beneficiaries of financial transactions.

### **Personal information ING processes**

The personal information ING processes of individuals may include, among others, sensitive personal information concerning their identity, domicile, name, address, personal status, position or capacity (such as function or role if acting on behalf of or for a client, supplier or business partner), assets, (financial) transactions, account numbers or other unique identifiers, signatures, creditworthiness or financial condition, email address, phone number, IP address or visits to ING's websites.

### **Purposes of information processing**

ING processes personal information for the following purposes:

- assessing and accepting of, entering into and executing of agreements with clients, business partners or suppliers, executing payment and other financial transactions, recording and financially settling services, products and materials delivered to and from ING, including communication with individuals involved in contracts (e.g. insured persons, beneficiaries, intermediaries), and dispute resolution and litigation;
- performing relationship management and (targeted) marketing to establish a relationship with and/or maintain as well as extend a relationship with a client;
- business process execution, internal management reporting and analysis including activities such as statistical and scientific analyses for the development and improvement of ING's products and/or services, account management and client service; creation of a global view of clients; managing company assets; conducting internal audits and investigations; finance and accounting; implementing business controls; provision of central processing facilities for efficiency purposes; managing mergers, acquisitions and divestitures;
- safety, health and security including the protection of ING and client, supplier or business partner assets and the authentication of client, supplier or business partner status and access rights;
- compliance with laws and regulations as well as sector-specific guidelines and regulations including, but not limited to, anti-money laundering and anti-terrorist financing regulations; and/or
- safeguarding the security and integrity of ING and/or the financial sector. This includes (1) the detection, prevention, investigation and combating of (attempts at) unlawful or undesirable

---

<sup>1</sup> Personal information refers to any information whether recorded in a material form or not, from which the identify of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual.

activities or conduct targeted towards ING, clients and staff, or other financial institutions, and (2) the use of and participation in warning systems (such as internal or external fraud registers).

#### **Personal data sharing with ING offices**

ING may share personal information with and transfer the information to other ING offices in the ING Group network provided their involvement is necessary to reach one of the purposes listed above. These other ING offices may be located in another country. ING will only pass on personal information to third parties outside of the Philippines in accordance with the requirements of any applicable data protection laws and regulations.

#### **Transfer of personal information to third parties**

ING may transfer personal information to third parties such as business partners, other financial institutions, suppliers or other service providers, intermediaries, beneficiaries of transactions, courts, regulatory authorities, warning systems or other third parties involved in reaching any of ING's purposes listed above. These third parties may be located in another country. ING will only pass on personal information to third parties outside of the Philippines in accordance with the requirements of any applicable data protection laws and regulations.

#### **Storage period**

ING shall retain personal information only:

- for the period required to serve the purposes for which the personal information were collected or for which they are further processed;
- to the extent reasonably necessary to comply with an applicable legal requirement; and/or
- as advisable in light of an applicable statute of limitations.

#### **Security**

ING has implemented appropriate, and commercially reasonable, technical, physical and organisational measures to protect personal information against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access and all other unlawful forms of processing. To achieve this, ING has implemented technology risk standards and other relevant policies and processes on the security of personal data.

#### **Recording telephone calls and electronic communication**

In transacting with ING, you consent to the monitoring, recording, storage and use of any telephone call, email or other forms of electronic communication for the following purposes:

- compliance with laws and regulations;
- being able to provide proof;
- to prevent, detect and investigate fraud or crime;
- assessing the quality of ING's services; and
- training, coaching, and assessment of ING employees.

You shall be requested to consent to the recording of telephone calls prior to any such recording. Your consent to the recording of telephone calls and electronic communication includes the consent for ING to provide records of telephone calls and electronic communications to authorities, to comply with laws and regulations, and to the ING unit in charge of security matters and/or ING employees responsible for monitoring compliance with corporate rules and regulations.

#### **Right of access, rectification, blocking, deletion and objection**

If ING processes your personal data, then you have the following rights:

- a right to request ING for an overview of your personal information processed by or on behalf of ING;
- a right to be furnished information regarding the recipients to whom the personal information are or may be disclosed;

- a right to have ING rectify, delete or block your personal information if the data are incorrect, incomplete, unlawfully obtained, or not processed in compliance with applicable data protection laws and regulations and the Global Data Protection Policy;
- a right to object to the processing of your personal information on the basis of compelling legitimate grounds relating to your particular situation provided that ING bases its processing on its legitimate interests or those of a third party to whom ING has disclosed the data;
- a right to object to receiving direct marketing communications from ING.

To make any of the above requests you need to put the request in writing addressing it to:

The Data Protection Officer  
20F Tower One Ayala Triangle  
Ayala Avenue, Makati City 1226  
Philippines

Your request needs to be accompanied by a photocopy of a valid identity card as proof of your identity. ING reserves the right to charge a reasonable fee for processing such request.

**Request for ING's Global Data Protection Policy**

You may request for more details on ING's Global Data Protection Policy by sending a request to:

[DPOManila@asia.ing.com](mailto:DPOManila@asia.ing.com)

**Modification of privacy statement**

ING keeps its privacy statement under regular review. This privacy statement was last updated on October 2017.