

Privacy Statement
for
ING Wholesale Banking and Retail customers
(V2.0)

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ING Bank N.V. is a European financial institution and is subject to the data protection obligations set out in the EU General Data Protection Regulation 2016/679 (GDPR). To comply with GDPR, ING Bank N.V. has implemented data protection principles on a global scale, through its Global Data Protection Policy (GDPP). The GDPP is binding on all ING entities, subsidiaries, branches, representative offices, and affiliates worldwide and approved by the EU Data Protection Authorities. Therefore, in addition to local privacy laws and regulations, ING Bank N.V. has resolved that all its entities, subsidiaries, branches, representative offices, and affiliates worldwide comply with GDPP regardless of geographical location, market typology or target customer.

This is the Privacy Statement of ING Bank N.V., all its entities, subsidiaries, branches, representative offices, affiliates and other ING group companies (“ING”, “we”, “us” and “our”), and it applies to us as long as we process Personal Data that belongs to individuals (“you”).

1. Purpose and scope of this Privacy Statement

At ING, we understand that your personal data is important for you. This Privacy Statement explains in a simple and transparent way what personal data we collect, record, store, use and process and how. Our approach can be summarised as: the right people use the right data for the right purpose.

This Privacy Statement applies to

- All past, present and prospective ING customers who are individuals (“you”). This includes one-person businesses, legal representatives or contact persons acting on behalf of our corporate customers.
- Non-ING customers. These could include anyone who makes a payment to or receives a payment from an ING account; anyone that visits an ING website, branch or office; professional advisors; shareholders; anyone who is a guarantor; ultimate beneficial owner, director or representatives of a company that uses our services; debtors or tenants of our customers; anyone involved in other transactions with us or our customers.

We obtain your personal data in the following ways:

- You share it with us when you become a customer, register for our online services, complete an online form, sign a contract with ING, use our products and services, contact us through one of our channels or visit our websites.
- From your organisation when it becomes a prospective customer or if it is an existing customer, and your personal data is provided to help us contact your organisation.
- From other available sources such as debtor registers, land registers, commercial registers, registers of association, the online or traditional media, publicly available sources or other companies within ING or third parties such as payment or transaction processors, credit agencies, other financial institutions, commercial companies, or public authorities.

2. The types of personal data we process

Personal data refers to any information that identifies or can be linked to a natural person.

Personal data we process about you includes:

For our retail customers:

- **Identification data:** the name, date and place of birth, age, ID number, email address, mailing address, telephone or mobile number, title, nationality, gender, and a specimen signature, fiscal code/social security number;

- **Transaction data**, such as your bank account number, any deposits, withdrawals and transfers made to or from your account, and when and where these took place, customer account number, and credit card number;
- **Financial data**, such as invoices, credit notes, payslips, payment behaviour, the value of your property or other assets, your credit history, credit capacity, financial products you have with ING, whether you are registered with a credit register, payment arrears and information on your income;
- **Socio-demographic data**, such as education, employment details, career track, customer segment, whether you are married and have children. Where local law considers this sensitive data, we respect the local law;
- **Online behaviour and preferences data**, IP address of your mobile device or computer you use and the pages you visit on ING websites and apps;
- **Data about your interests and needs** that you share with us, for example when you contact our call centre or fill in an online survey;
- **Know our customer data as part of customer due diligence and** to prevent fraudulent conduct or behaviour that contravenes international sanctions and to comply with regulations against money laundering, terrorism financing and tax fraud;
- **Audio-visual data**; where applicable and legally permissible, we process surveillance videos at ING branches, or recordings of phone or video calls or chats with our offices. We can use these recordings, to verify telephone orders, for example, or for fraud prevention or staff training purposes;
- **Biometric data**, such as facial recognition data (e.g., the selfies we will ask you to take during the account opening process, as well as the liveness detection step you will undergo) or fingerprint. We will use biometric data for customer verification;
- **Your interactions with ING on social media**, such as Facebook, Twitter, Instagram, Google+ and YouTube. We follow public messages, posts, likes and responses to and about ING on the internet.

For our wholesale banking customers:

- **Identification data**: the name, date and place of birth, ID number, email address, mailing address, telephone or mobile number, title, nationality, gender, and a specimen signature, fiscal code/social security number;
- **Financial data**: when you undertake a guarantee with us for the benefit of a customer, we may verify credit history, credit capacity, and other information relating to your creditworthiness and credit conditions;
- **Online behaviour and preferences data**: IP address of your mobile device or computer and the pages visited on ING websites and apps;
- **Data about customer's interests and needs** shared with us when you contact our officers or participate in an ING survey;
- **Know our customer data as part of customer due diligence and** to prevent fraudulent conduct or behaviour that contravenes international sanctions and to comply with regulations against money laundering, terrorism financing and tax fraud;

- **Audio-visual data:** where applicable and legally permissible, we process surveillance videos at ING branches, or recordings of phone or video calls or chats with our offices.

Sensitive data

Sensitive data is data relating to your health, ethnicity, religious or political beliefs, genetic or biometric data, or criminal data (information on fraud is criminal data and we record it). We may process your sensitive data if:

For our retail customers:

- We have your explicit consent;
- We are required or allowed to do so by applicable local law. For example, we may be obliged to keep a copy of your passport or identity card when you become an ING customer;
- You instruct us to make a payment, for example, to a political party or religious institution;
- If allowed under local law, and you choose to use it, we may use face, fingerprint or voice as recognition for authentication to access mobile apps and perform certain operations therein.

For our wholesale banking customers:

- We have your explicit consent;
- We are required or allowed to do so by applicable local law; or
- You provide sensitive data as part of a contractual agreement or in connection with a requested product or service.

For example, we process sensitive data in connection with

- Know your customer (KYC) data obligations: we may keep a copy of your passport or ID card, as applicable based on local law;
- Money laundering or terrorism financing monitoring: we monitor your activity and may report it to the competent regulatory authorities; and
- If allowed under local law, and you choose to use it, we may use your face, fingerprint or voice as recognition for authentication into mobile apps and certain operations.

Children's data (only applies to our retail customers)

We only collect data about children if they have an ING product or if you provide us with information about your own children in relation to a product you buy. We will seek parental consent when it's required by local law.

3. What we do with your personal data

Processing means every activity that can be carried out in connection with personal data such as collecting, recording, storing, adjusting, organising, using, disclosing, transferring or deleting it in accordance with applicable laws. We only use your personal data for business purposes such as:

For our retail customers:

- **Performing agreements to which you are a party or taking steps prior to entering into agreements.** We use information about you, such as your name and contact details, when you enter into an agreement with us, or we have to contact you. We analyse information about you to assess whether you are eligible for certain products and services. For example, we may look at your payment behaviour and credit history when you apply for a loan or a mortgage. And we use your account details when you ask us to make a payment or carry out an investment order.
- **Relationship management and marketing.** We may ask you for feedback about our products and services, or record your conversations with us online, by telephone or in our branches. We may share this with certain members of our staff to improve our offering or to customise products and services for you. We may send you newsletters, emails, telephone calls, or mobile notifications informing you about these products and services. Of course, if you don't want to receive these offers you have the right to object or to withdraw your consent.
 - **Providing you with the best-suited products, services and marketing.** We may use your data for commercial activities, including processing which is necessary for developing and improving our products and/or services, customer service, segmentation of customers and profiling and the performance of (targeted) marketing activities. We do this to establish a relationship with you and/or to maintain and extend a relationship with you and for performing statistical and scientific purposes. You have the right to withdraw your consent or object to personalised direct marketing or commercial activities, including related profiling activities. Moreover, you can always unsubscribe from receiving personalised offers.
 - **To improve and develop our products and services.** Analysing how you use and interact with our products and services helps us understand more about you and shows us where and how we can improve. For instance:
 - When you open an account, we measure how long it takes until you are able to use your account.
 - We analyse the results of our marketing activities to measure their effectiveness and the relevance of our campaigns.
 - Sometimes we analyse your personal data using automated processes, such as algorithms, to speed up credit decisions for loans and mortgages.
 - We analyse data on transactions between you and our third-party service providers and supplier to offer information services to our third-party service providers and suppliers or provide them advice on how they can make better use of ING's products and services. When ING processes personal data for this purpose, aggregated data may be made available to the third-party service providers and suppliers. A corporate customer cannot identify you from these aggregated data.
 - **For credit risk and behaviour analysis.** We use and analyse data about your income, credit history and payment behaviour to assess your ability to repay a loan, for example. We also disclose your personal data for income verification with tax authorities, banks, banking associations, and credit bureaus.

- **Business process execution, internal management and management reporting.** We process your data for our banking operations and to help our management make better decisions about our operations and services.
- **Safety and security.** We have a duty to protect your personal data and to prevent, detect and contain any breaches of your data. This includes data we are obliged to collect about you, for example to verify your identity when you become a customer. Furthermore, we not only want to protect you against fraud and cybercrime, we have also a duty to ensure the security and integrity of ING and the financial system as a whole by combatting crimes like money laundering, terrorism financing and tax fraud.
 - To protect your assets from fraudulent activities online, for example, if you are hacked and your username and password are compromised.
 - We may use certain information about you (e.g. name, account number, age, nationality, IP address, etc.) for profiling purposes to detect fraudulent activities and the perpetrators.
 - We may use your personal data to alert you if we detect suspicious activity on your account, for example when your debit or credit card is used in a non-typical location.
- **Protecting your vital interests.** We process your data when necessary to protect your interests which are essential for your life or that of another natural person. For example for urgent medical reasons. We will only process your data necessary for the vital interests of another natural person if we cannot base it on one of the other purposes mentioned.
- **Compliance with legal obligations to which we are subject.** We process your data to comply with a range of legal obligations and statutory requirements.

For our wholesale banking customers:

- **Performing agreements to which you are a party or taking steps prior to entering into agreements.** If you are a representative of a corporate customer, we may use your personal data to enter into an agreement with the customer, and to contact the customer when needed. If you are an individual providing guarantee for the customer, or a beneficiary of payment instruments we may use your personal data to enter into an agreement or executing a payment order in connection to our arrangements with the customer. We may verify your capacity and powers using trade registers or incumbency certificates;
- **Relationship management and marketing.** We may ask you as the representative of the customer to give us feedback on the products and services offered to the business client. We may send newsletters, emails, telephone calls, or mobile notifications regarding new and existing products and services offered by ING. You may opt out of any communication at any time;
 - **Providing the best-suited products and services.** When you as the representative of a customer visit our website, call our customer service centre, talk to an ING employee or visit a branch, we may gather information about the customer;
 - **Improving and developing products and services.** Analysing how products and services are used helps us understand more about our performance and shows us where and how we can improve our products and services;

- **Business process execution, internal management and management reporting.** We process personal data for our financial services operations and to help our management make better decisions about our operations and services;
- **Safety and security.** We have a duty to protect all personal data and to prevent, detect and contain a data breach or fraud involving personal data collected to comply with regulations against money laundering, terrorism financing and tax fraud. To safeguard and ensure the security and integrity of ING, the financial sector, clients and employees, we may
 - Process your personal data to protect your organisation's assets from fraudulent activities, for instance in case your identity (e.g. username and password) is compromised.
 - Use certain personal data (e.g. name, account number, age, nationality, IP address, etc.) for profiling to detect fraudulent activities and the actors behind it.
 - Use your personal data to alert you in case we detect suspicious activities involving your business's assets, for example a transaction is taking place from a non-typical location.
- **Compliance with legal obligations to which we are subject.** We process personal data to comply with a range of legal obligations and statutory requirements (anti-money laundering legislation and tax legislation etc.). For example, know your customer (KYC) rules and regulations require ING to verify the identity before accepting you as a customer. Upon request by authorities, ING may report the transactions carried out by customers.

When processing is not compatible with one of above purposes, we ask for your explicit consent which you may withhold or withdraw at any time.

Applicable laws require us to retain personal data for a period of time. This retention period may vary from a few months to a several years, depending on the applicable local law. Generally, we delete your personal data or bundle data at a certain abstraction level (aggregate), render it anonymous, and dispose of it, in 5 years according with applicable laws and regulations. We may retain your personal data for a longer period for an ongoing audit, investigation, litigation, or other legal proceeding.

We may use your existing/retained personal data, KYC information, and transaction history with us (including existence of active, dormant, terminated, or blocked accounts) when you avail of products and services.

4. Who we share your data with and why

To offer you the best possible services and remain competitive in our business, we share certain data internally i.e., with other ING businesses and externally (i.e., outside of ING) with third parties.

Whenever we share your personal data externally (i.e., outside of ING) with third parties in countries outside of the European Economic Area (EEA) we ensure the necessary safeguards are in place to protect it. For this purpose, we rely upon, amongst others:

- Requirements based on applicable local laws and regulations.

- [EU Model clauses](#), when applicable, we use standardised contractual clauses in agreements with service providers to ensure personal data transferred outside of the European Economic Area complies with GDPR.
- [International treaties such as the EU US Privacy Shield](#) framework that protects personal data transferred to certain service providers in the United States.

For both our retail and wholesale banking customers:

ING entities

We transfer data across ING businesses and branches for various purposes (see section 'What we do with your personal data' for the full list). We may also transfer data to centralised storage systems or to process it at a central point within ING for efficiency purposes. For all internal data transfers we rely on our binding corporate rules as defined in EC Regulation (EU) 2016/679, which is our Global Data Protection Policy (GDPP), and on the applicable local laws and regulations.

Government, Supervisory and Judicial authorities

To comply with our regulatory obligations we may disclose data to the relevant government, supervisory and judicial authorities such as:

- **Public authorities, regulators and supervisory bodies** such as the central banks and other financial sector supervisors in the countries where we operate.
- **Tax authorities** may require us to report customer assets or other personal data such as your name and contact details and other information about your organisation. For this purpose, we may process your identification data like social security number, tax identification number or any other national identifier in accordance with applicable local law.
- **Judicial/investigative authorities** such as the police, public prosecutors, courts and arbitration/mediation bodies on their express and legal request.

Financial institutions

To process certain payment and withdrawal services, we may have to share information about the customer or its representative with another bank or a specialised financial company. We also share information with financial sector specialists who assist us with financial services like

- Exchanging secure financial transaction messages;
- Payments and credit transactions worldwide;
- Processing electronic transactions worldwide;
- Settling domestic and cross-border security transactions and payment transactions; or
- Other financial services organisations, including banks, superannuation funds, stockbrokers, custodians, fund managers and portfolio service providers.

Service providers and other third parties

When we use other service providers or other third parties to carry out certain activities in the normal course of business, we may have to share personal data required for a particular task. Service providers support us with activities like

- optimizing, debugging and enhancing our products and services, including our mobile application
- Designing, developing and maintaining internet-based tools and applications;
- IT service providers who may provide application or infrastructure (such as cloud) services;
- Marketing activities or events and managing customer communications, including mobile attributions and the provision of analytics;
- Preparing reports and statistics, printing materials and designing products;
- Placing advertisements on apps, websites and social media;
- Legal, auditing or other special services provided by lawyers, notaries, trustees, company auditors or other professional advisors;
- Identifying, investigating or preventing fraud or other misconduct by specialised companies;
- facilitating payment and transfer of funds;
- securing credit history and verifying ability to pay;
- Performing specialised services like postal mail by our agents, archiving of physical records, contractors and external service providers; or
- Carrying out securitisation arrangements (such as trustees, investors and the advisers).

Account information and payment initiation services within the EU

The revised EU Payment Service Directive (PSD2) allows you to instruct a third-party payment service provider (TPP) to retrieve account information or initiate payments on your behalf with respect to your accounts with ING. The TPP may do so only if you have given your explicit consent to those services.

When we receive a request from a TPP on your behalf, we are obliged to carry out the request for payment or account information, as requested.

Additionally you can also use the PSD2 services to manage your accounts with other banks through your ING channels or apps. You may use the ING app or channel to

- View account information of your current payment accounts with other banks;
- Make online payments from your current payment account with other banks.

In this case, we will be the TPP and we may only offer these services if we receive your explicit consent. If you decide that you no longer want to use these PSD2 services, you can simply turn off the feature in the ING online environment.

For our retail customers only:

Independent agents, brokers and business partners

We may share your personal data with independent agents, brokers or business partners who act on our behalf, or which jointly offer products and services with us, such as insurance. They are registered in line with local legislation and operate with due permission of regulatory bodies.

Researchers

We are always looking for new insights to help you get ahead in life and in business. For this reason, we exchange personal data (when it's legally allowed) with partners like universities and other independent research institutions, who use it in their research and innovation. The researchers we engage must satisfy the same strict requirements as ING employees. The personal data is shared at an aggregated level and the results of the research are anonymous.

5. Your rights and how we respect them

If your personal data is processed, you have privacy rights. Based on applicable laws, your privacy rights may vary from jurisdiction to jurisdiction. If you have questions about which rights apply to you, please get in touch with us through the email address mentioned in item 9.

We grant the following rights:

Right to access information

You have the right to ask us for an overview of your personal data that we process.

Right to rectification

If your personal data is incorrect, you have the right ask us to rectify it. If we shared data about you with a third party and that data is later corrected, we will also notify that party accordingly.

Right to object to processing

You can object to ING using your personal data for its own legitimate interests if you have a justifiable reason. We will consider your objection and whether processing your information has any undue impact on you that would require us to stop processing your personal data.

You may not object to us processing your personal data if

- We are legally required to do so; or
- It is necessary to fulfil a contract with you.

For our retail customers only:

You can also object to receiving personalised commercial messages from us. When you become an ING customer, we may ask you whether you want to receive personalised offers. Should you later change your mind, you can choose to opt out of receiving these messages. For example, you can use the **'unsubscribe' link** at the bottom of commercial emails or manage your preferences on our website or mobile banking app.

In addition, even if you opt out of receiving personalised offers, we will alert you to unusual activity on your account, such as:

- When your credit or debit card is blocked;
- When a transaction is requested from an unusual location.

Right to object to automated decisions (applicable to retail customers only)

We sometimes use systems to make automated decisions based on your personal information if this is necessary to fulfil a contract with you, or if you gave us consent to do so. You have the right to object to such automated decisions (for example the price we charge for a product or service). However, your objection to automated decisions may prevent us from offering certain products and services to you.

Right to restrict processing

You have the right to ask us to restrict using your personal data if

- You believe the personal data is inaccurate;
- We are processing the data unlawfully;
- We no longer need the data, but you want us to keep it for use in a legal claim;
- You have objected to us processing your data for our own legitimate interests.

Right to data portability

You have the right to ask us to transfer your personal data directly to you or to another company. This applies to personal data we process by automated means and with your consent or on the basis of a contract with you. Where technically feasible, and based on applicable local law, we will transfer your personal data.

Right to erasure

ING is legally obliged to keep your personal data. You may ask us to erase your online personal data and right to be forgotten would be applicable if

- We no longer need it for its original purpose;
- You withdraw your consent for processing it;
- You object to us processing your data for our own legitimate interests or for personalised commercial messages;
- ING unlawfully processes your personal data; or
- A local law requires ING to erase your personal data.

Right to complain

Should you as a customer or its representative be unsatisfied with the way we have responded to your concerns, you have the right to submit a complaint to us. If you are still unhappy with our reaction to your complaint, you can escalate it to the ING Bank data protection officer. You can also contact the data protection authority in your country if applicable.

Right to Damages

The data subject shall be indemnified for any damages sustained due to such inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal data, taking into account any violation of his or her rights and freedoms as data subject.

Exercising your rights

How you exercise your rights depends on your ING product and the availability of services in your country. If you want to exercise your rights or submit a complaint, please contact us.

When exercising your right, the more specific you are with your application, the better we can assist you with your question. We may ask you for a copy of your ID, or additional information to verify your identity. In some cases we may deny your request and, if permitted by law, we will notify you of the reason for denial. If permitted by law, we may charge a reasonable fee for processing your request.

We want to address your request as quickly as possible. However, based on your location and applicable laws, the response times may vary. Should we require more time (than what is normally permitted by law) to complete your request, we will notify you immediately and provide reasons for the delay.

6. Your duty to provide data

In some cases, we are legally required to collect personal data or your personal data may be needed before we may perform certain services and provide certain products. We undertake to request only the personal data that is strictly necessary for the relevant purpose. Failure to provide the necessary personal data may cause delays in the availability of certain products and services.

7. How we protect your personal data

We take appropriate technical and organisational measures (policies and procedures, IT security etc.) to ensure the confidentiality and integrity of your personal data and the way it's processed. We apply an internal framework of policies and minimum standards across all our business to keep your personal data safe. These policies and standards are periodically updated to keep them up to date with regulations and market developments.

In addition, ING employees are subject to confidentiality obligations and may not disclose your personal data unlawfully or unnecessarily. To help us continue to protect your personal data, you should always contact ING if you suspect that your personal data may have been compromised.

8. Changes to this Privacy Statement

We may amend this Privacy Statement to remain compliant with any changes in law and/or to reflect how our business processes personal data. This version was created on 14 August, 2019.

9. Contact and questions

To learn more about ING's data privacy policies and how we use your personal data, you can send us an email, call us or visit your local branch or office.

Country	Contact details ING	Data Protection Authority
Australia	customer.service@ing.com.au	OAIC- Office of the Australian Information Commissioner https://oaic.gov.au/
Belgium	ing-be-privacyoffice@ing.com	Belgian Privacy Commission http://www.privacycommission.be
Bulgaria	Emil.Varbanov@ing.com	Commission for Personal Data Protection https://www.cdpd.bg/
China	dpochina@asia.ing.com	
Czech Republic	Dpo-cz@ing.com	Úřad pro ochranu osobních údajů https://www.uoou.cz
France	Dpo.privacy.france@ing.com	Commission Nationale Informatique et Libertés https://www.cnil.fr/fr
Germany	datenschutz@ing.de	Der Hessische Beauftragte für Datenschutz und Informationsfreiheit https://datenschutz.hessen.de/
Hong Kong	dpohongkong@asia.ing.com	PCPD- Privacy Commissioner for Personal Data, Hong Kong https://www.pcpd.org.hk/
Hungary	communications.hu@ingbank.com	Hungarian National Authority for Data Protection and Freedom of Information http://www.naih.hu/
Italy	privacy@ingdirect.it	Garante per la protezione dei dati personali www.gpdp.it www.garanteprivacy.it www.dataprotection.org
Japan	dpotokyo@asia.ing.com	PPC – Personal Information protection Commission Japan https://www.ppc.go.jp/en/
Luxembourg	dpo@ing.lu	CNPD - Commission Nationale pour la Protection des Données https://cnpd.public.lu
Malaysia	dpomalaysia@asia.ing.com	PDP - Jabatan Perlindungan Data Peribadi http://www.pdp.gov.my/index.php/en/
Netherlands	privacyloket@ing.nl	Autoriteit Persoonsgegevens

Country	Contact details ING	Data Protection Authority
		https://autoriteitpersoonsgegevens.nl/
Philippines	The Data Protection Officer 22/F Arthaland Century Pacific Tower 5 th Avenue corner 30 th Street Bonifacio Global City Taguig City 1634 Philippines DPOManila@asia.ing.com	National Privacy Commission https://privacy.gov.ph/
Poland	abi@ingbank.pl	Generalny Inspektor Ochrony Danych Osobowych http://www.giodo.gov.pl/
Portugal	dpo@ing.es	CNPD- Comissão Nacional de Protecção de Dados https://www.cnpd.pt
Romania	protectiadatelor@ing.ro	National Supervisory Authority for Personal Data Processing (ANSPDCP) http://www.dataprotection.ro/
Russia	Mail.russia@ingbank.com	The Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor) https://rkn.gov.ru/
Singapore	dposingapore@asia.ing.com	PDPC- Personal Data Protection Commission Singapore https://www.pdpc.gov.sg/
Slovakia	dpo@ing.sk	Úrad na ochranu osobných údajov Slovenskej republiky https://dataprotection.gov.sk/uoou/
South Korea	dposouthkorea@asia.ing.com	
Spain	dpo@ing.es	Agencia Española de Protección de Datos https://www.agpd.es
Taiwan	70th floor, Taipei 101 Tower 7 XinYi Road, Sec. 5 11049 Taipei Taiwan	
Ukraine	dpe.office@ing.com	Personal Data Protection department of Ombudsman http://www.ombudsman.gov.ua
United Kingdom	ukdpo@ing.com	Information Commissioner's Office (ICO) https://ico.org.uk

