

# ING's Privacy Statement

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## 1. Our privacy statement

ING Belgium cares about your privacy. Therefore we also want you to know clearly how your personal data is collected and used by us. 'We' are ING Belgium SA/NV, established at Avenue Marnix 24, 1000 Brussels.

The aim of this privacy statement is to explain to "you" – as a customer, potential customer, website visitor or just somebody in contact with us – in a simple way what kind of personal data we gather and how we process it.

This privacy statement is for both private individuals and legal entities.

## 2. Processing and using your personal data

By personal data we do not only mean data which directly identify you but also data which can indirectly identify you.

- **Direct identification** happens through personal data such as your name, address, national identification number, e-mail address, telephone number, etc.
- **Indirect identification** happens through information which can identify you if it is combined with other information. For example, your account number is not personal data per se. However it becomes personal data when it is linked to your name.

Using and processing personal data includes collection, recording, storage, use, consultation, modification, disclosure, distribution or destruction of your personal data.

### 2.1 What personal data do we process?

The types of personal data we typically process include:

- **Identification data**, such as first name, surname, date and place of birth, ID number, e-mail address and even the IP address of your PC or mobile device when used.
- **Data related to transactions you perform via us**, such as bank account number, deposits, withdrawals and transfers related to your account.
- **Financial data** such as invoices, credit notes, pay-slips, payment behaviour, value of your property or other assets, credit history and present credit capacity.
- **Socio-demographic data**, such as your marital status, your family situation or other relationships.
- **Data related to your online behaviour and preferences** we detect when you are searching on our websites or when you are using our mobile applications.
- **Data related to your interests and needs** which you share with us via personal contact (also via our contact centre) or through our website (e.g. when you fill in an online survey).
- **Audio-visual data** such as surveillance video recordings when you visit our branches or phone recordings when you call our contact centre.

To comply with regulatory obligations, we could also use data available through external sources (e.g. EU information on counter-terrorism and anti-money laundering) to ensure security and protection.

In principle we do not capture nor use sensitive personal data relating to health, religious, political or philosophical beliefs, sexual orientation or ethnicity.

We only process sensitive personal data when we have to in specific circumstances, e.g. where it is mentioned with a payment (for instance, an instruction to pay membership to a political party).

## 2.2 Whose personal data do we process?

We process personal data of private individuals and legal entities with whom we have, could have, or used to have, a **direct or indirect relationship**.

Such personal data may relate in particular to:

- Customers and their representatives or beneficiaries
- Potential customers who show an interest in our products and services
- Representatives of a legal entity, such as a company or a non-profit association.

For example we process your personal data when you open an account, visit our website or complete a survey. This includes data relating to you as an individual, as well as limited personal data of named individuals acting on behalf of a legal entity.

We will also use personal data of so-called third parties, who are no ING customers but who deal with the customer in a particular role, privilege or title.

Some examples below:

- Legal representatives (e.g. power of attorney)
- Beneficiaries of payment transactions made by our customers
- Ultimate beneficial owners (UBOs)
- Customers' debtors (e.g. following a bankruptcy)
- Company shareholders if individuals
- Statutory representatives
- Directors or a person indicated as a contact of a business client.

## 2.3 Why do we use your personal data?

We use your personal data for the following purposes:

- **Customer file administration**

If you want to become one of our customers, we are obliged by law to collect some of your personal data (such as a copy of your ID card or other supporting documentation) to assess whether we can accept you as a client or not. Furthermore, we will need your address or phone number to contact you in the future.

- **Product and service delivery**

If you wish to purchase a new product or service (e.g. current/savings accounts, mortgage loans, investments), we will also require some of your personal data to review whether we can provide you with these specific products or services.

- **Customer relationship management**

You may be invited to participate in customer satisfaction or other types of surveys. The results of such surveys may be made available to our staff to improve our products and services. We might also use notes from appointments in a branch to offer more easily customized products and services.

- **Credit risk and behaviour analysis**

When granting a loan we assess your ability to repay. Applying specific statistic risk models based on your personal data helps us assess that you will be able to reimburse the loan.

- **Personal approach for commercial offers**, such as sending letters or e-mails with a personal offer or showing personal offers on our website or mobile apps.

To provide you with the best-suited products and services, we may:

- Analyse **information we gather** when you visit our website or when you have an appointment in a branch
  - Analyse **potential needs** and the suitability of products or services (e.g. we might invite you to our branch to discuss investment opportunities suited to your profile)
  - Analyse **payment behaviour** (e.g. large inflows/outflows on your account)
  - Assess needs related to **key moments** when specific financial products or services are relevant for you (e.g. the birth of your child, your first job, the purchase of your own home)
  - Assess **interests** based on simulations you have made on our website
- **Optimisation of the performance of our services**
    - Transaction data analysis provide us insights into the usage of our services and how to improve them. For instance when you open an account, we measure the time between opening and first transaction.
    - We also analyse results of marketing activities to measure effectiveness and relevance of our campaigns.
  - **Prevention, detection and containment of regulatory breaches** against regulations we are bound by (e.g. anti-money laundering, countering terrorism financing, as well as tax fraud).
  - **To protect you and your assets** from fraudulent activity, we process personal data. This might happen when you are victim of identity theft, your personal data was disclosed or you are hacked.

We may also use customer profiling by combining a customer's data (name, account number, age, nationality, IP address etc.) to quickly and efficiently detect any particular crime.

We also use contact and security data (e.g. card reader, password, etc.) to secure transactions and communications over our remote channels.

### 3. How do we manage your personal data?

#### 3.1 We comply with the legal framework on personal data protection

Reputation for integrity and respect for customer privacy are extremely important to us.

We do our utmost to comply with the applicable Belgian Data Protection law and its implementation measures, supervised by [the Belgian Privacy Commission](#).

In accordance with [the law](#), we take appropriate organisational and technical measures (e.g. policies and procedures, IT security measures, etc.) to ensure that personal data are secured against accidental loss or unauthorized disclosure.

We also make contractual arrangements with suppliers or partners who process your personal data or to whom we communicate your information.

#### 3.2 How do we collect your personal data?

Personal data are collected when you become a customer or register with our online services, complete online forms or sign contracts, use our products and services or contact us via the various channels.

### 3.3 What about cookies?

We use cookies on our website to help it perform better, remember your preferences and present information we think is of interest to you.

Cookies are small data files stored on your computer. They perform different functions but typically record websites visited. They contain some information about specific website visits to remember you and your preferences for subsequent visits.

Cookies can be 'functional' and contain data about you (as a user) such as language or currency selected so these appear whenever you visit the website.

Cookies can also be 'technical' and record data about ING Belgium webpages visited and also when information may be entered in forms. Such cookies provide tailored information and prevent repetitive sending of advertisements or announcements.

We also use data from cookies to compile statistics of our website and to improve its content and performance.

We may use cookies to track patterns of online behaviour to tailor website content to your needs and interests.

Most web browsers automatically accept cookies. However you can tell your browser to expose each cookie sent or to prevent them from being saved. If you refuse our cookies, you may experience reduced speed or be unable to access all services.

For more information on the use of our cookies, please read the [ING cookies statement](#). For more general information on the use of cookies, we refer to [www.allaboutcookies.org](http://www.allaboutcookies.org)

### 3.4 Automated processing of your personal data

To optimally offer services and products, your personal data can occasionally be processed automatically. This includes credit decisions (e.g. Granting loans/mortgages to customers are taken using an algorithm). Automated decision-making is an advantage in order to ensure fair access to all loan applicants. You have the right to request a personal review of any automated decision.

### 3.5 We secure your data

#### 3.5.1 How do we secure your data?

Keeping data secure is a responsibility we take very seriously. A security governance framework is periodically updated and in line with international best practices. More specifically, appropriate technical measures, procedures and policies ensure integrity of personal data and its confidential and safe processing.

#### 3.5.2 How can you secure your personal data?

We do our utmost to secure your data, but the following may ensure data security on your part.

- Install anti-virus software, anti-spyware software and a firewall. Set your preference to update these protections often.
- Do not leave equipment and tokens (e.g. bank card) unattended.
- Report loss of bank card to ING Belgium and Card Stop immediately.
- Log out of an ING application if you are not using it.
- Keep passwords strictly confidential and use strong passwords, i.e. avoiding obvious combinations of letters and figures.
- Beware of anything strange, such as a new website address or unusual requests, e.g. e-mail requests for customer details.

More information on how to protect your personal and confidential data while interacting with us is available on the security section on [our website](#).

### 3.6 How long do we keep your personal data?

We keep your personal data no longer than is necessary for the purposes for which it was collected.

For example, your personal data as a prospect will be kept for a maximum one year. Other data, as collected by surveillance cameras or call recordings are kept for shorter periods as required by law.

When assessing how long to keep personal data, retention requirements might be stipulated by other applicable laws (e.g. anti-money laundering law). Kept personal data can serve as legal evidence in litigation, but we will not use such personal data actively.

Retention periods may depend on circumstances (your data may be archived for up to 10 years after your bank account has been closed or even up to 30 years for your mortgage loan data).

## 4. With whom do we share your personal information?

### 4.1 Your personal data within ING

We take maximum care with personal data and only share data to provide you with best of services.

We may transfer personal data to other ING entities. In particular, ING Customer Contact Centre and other ING Group subsidiaries assisting us with operations (e.g. for payment screening required by law), IT security or specific services and product provisions. For some security activities and anti-money laundering, we may use ING entities outside of Belgium. Sometimes we transfer data to ING entities outside the European Economic Area, for example activities sub-contracted to ING GSO Philippines.

While liable for our own products, we work with independent agents who act on our behalf. These agents are registered in the Belgian register of "brokers providing banking and investment services" and "insurance brokers" which is kept by the Financial Services and Markets Authority (FSMA), rue du Congrès 12-14, 1000 Brussels.

You can read more about our and ING Group activities at <https://www.ing.com/en.htm> and in our General Regulations. ING Group ensures that personal data exchanged or shared within the Group is protected according to globally accepted regulations and best practices.

### 4.2 Your personal data outside ING

1. In some cases we are **obliged by law** to share your data with external parties, to whom we are legally obliged to transfer personal data :

- **Public authorities, regulators and oversight bodies** when there is a legal obligation to communicate/disclose customer information, such as tax authorities, the National Bank of Belgium (NBB)
- **Judicial/Investigative authorities** such as the police, public prosecutors, courts, arbitration/mediation bodies on their express and legally vetted request
- **Lawyers** for example in cases of bankruptcy, **notaries** for example when granting a mortgage, or trustees who take care of other parties' interest, and **company auditors**.

2. Trusted third parties may need personal data for service provision, although we are **not obliged by law** to transfer personal data:

- Financial sector specialists who also have a legal obligation to treat personal data with all due care:
  - **SWIFT** for secure financial transaction message exchange
  - **MasterCard** for payments and credit transactions worldwide
  - **Card Stop** to block your bank card
  - **Atos Worldline** for global credit transactions

- **Euroclear** for settling domestic and cross-border security transactions
- **Gemalto** for the personalisation of bank cards
- Correspondent banking/financial institutions in foreign countries

Please read the specific data protection policies/privacy statements of these specialists on their respective websites.

- Service providers who support us with the:
  - Design and maintenance of our internet-based tools and applications
  - Marketing of activities or events and customer communications management
  - Preparation of reports and statistics, printing materials and design of our products
- Institutions for whom we sell the products, e.g. insurance companies

In the above cases we ensure that third parties can only access those personal data needed for specific tasks. We also ensure that such parties keep data in a secure and confidential manner and use it as we tell them to. We do not sell personal data to any third party under any circumstance

For third parties outside Belgium, we ensure that personal data is adequately protected in the foreign country. Where personal data is transferred outside the European Economic Area (EEA), personal data protection is different as in the EEA. In such cases, we ensure (e.g. contractual measures) that personal data is processed using the same care as in Belgium.

## 5. What are your rights?

### 5.1 Do you want to access or rectify your personal data?

We maintain a high level of transparency about data we used. By law you can request to access your personal data we hold. The bank can provide you with:

- A description of the personal data held by us
- Why we collect your data
- External parties to whom the data is transferred
- The reasons for any automated processing of your data

You can request access to your personal data in one of our branches.

To protect you, proof of identity or answering security questions is necessary to fulfil your request. We will provide you with a copy of the data we use. For additional copies, we may charge a fee for administrative costs.

Nevertheless, we may have to deny access when this would reveal commercially sensitive information or when it relates to legal investigations. You will be informed of the reason for denial within due time and you can submit a complaint through one of our channels.

Necessary steps are taken to ensure that personal data is accurate, up-to-date, complete, relevant. We can ask you to confirm your data is still up-to-date. If you think it is incorrect, you may ask us to change it.

We respond to your request as quickly as possible and notify you of the time needed to complete.

We change personal data if they appear inaccurate, out-of-date, incomplete, irrelevant or misleading taking into account the purpose.

If corrected and previously shared with a third party, we will also notify such third parties when required by law.

If we disagree with your request to correct your personal data, we will explain the reason for the refusal and how you can complain. We can provide you with an amendment statement that the data, according to you, is incorrect.

To make such a request, you need to go to a branch of your choice.

## 5.2 Do you want to stop receiving personalized offers?

When you become our client, we ask you to tell us your choice regarding the use of your data for a personal commercial approach. At any subsequent time, you can decide to no longer receive our personalized commercial approach:

- Via the **'unsubscribe' button** at the bottom of each commercial e-mail
- By adapting your privacy settings in your **ING Home'Bank** profile
- Through our contact form on **ing.be**
- By **calling** our ING Contact Centre (+32 2 464 60 04)
- By visiting [www.robinsonslist.be](http://www.robinsonslist.be) and subscribing to Robinson Mail and the "bel-me-niet-meer-lijst"

Please note that we may contact you, even if you have objected to a personalised commercial approach, for other purposes, such as a legal requirement or for the performance of a contract (e.g. important information about your bank account or loan).

## 5.3 Do you wish to have more information or do you have a complaint?

We are liable for due care of personal data you entrust us with, such as name, address and bank account details.

We commit to deal quickly with any privacy-related complaint and, as such, have procedures which enable us to respond efficiently.

If you would like more information about third parties to whom we may disclose personal data because of a legal obligation or as part of a service they provide us with, or if you have questions about your personal situation, you can contact us by:

- calling us (02 547 61 02)
- sending us an e-mail ([plaintes@ing.be](mailto:plaintes@ing.be)) or
- filling in a web form on <https://www.ing.be/en/retail/complaint-handling>.

You can also send us a letter to the following address below

ING Complaint Management  
Cours Saint-Michel 60  
1040 Brussels

If you are not satisfied with the way your complaint has been handled, there is the alternative to report to the [Privacy Commission](#)

## 6. About this privacy statement

This privacy statement, dated 01/01/2017, may be amended to ensure that its content accurately reflects regulatory developments, as well as any changes at ING Belgium. The latest applicable version will be available on the website and we will inform you of changes via the website and other communication channels.