

1. General Provisions

1.1. ING Belgium SA/NV respects the privacy of all private individuals, including that of the user and of any customer on whose behalf the Phone'Bank, Home'Bank and Business'Bank contract was concluded and who is the holder and/or joint holder of the account(s) accessible and managed via Phone'Bank, Home'Bank or Business'Bank services, as well as that of any other individuals concerned, in accordance with prevailing legislation and regulations.

The data controllers for personal data relating to the individuals concerned which is transmitted in connection with the Phone'Bank, Home'Bank or Business'Bank services (including via online forms, environment variables, etc.) are ING Belgium SA/nv, whose head office is located at Avenue Marnix/Marnixlaan 24, 1000 Brussels (Belgium) (e-mail: info@ing.be) and, where applicable, another ING Group company based in a European Union Member State as well as, where applicable, the other persons defined in point 1.3. below.

1.2. Personal data relating to individuals communicated to ING in the context of the conclusion or execution of the Phone'Bank/Home'Bank/Business'Bank Agreement, particularly in the context of use of the Home'Bank/Business'Bank On line services or the Phone'Bank telephone services, is processed by ING for the purposes of centralised customer management, management of accounts and payments, marketing (including research and statistics) of banking, financial (including leasing) and insurance services (unless opposed by the individual concerned), establishing a customer profile, monitoring the legality of transactions and preventing irregularities as well as, if necessary, credits, administration of assets (investments) and brokering services (in particular insurance and/or leasing).

Data relating to individuals managed by ING's intermediaries (independent agents or brokers), including that relating to their financial transactions, is also processed by ING to ensure compliance by these intermediaries with their obligations imposed under the law, by regulations (including resulting from a FSMA/BNB circular) or contractually, including any duty of exclusivity owed to ING.

Data provided at the initiative of individuals to other ING Group companies based in an EU Member State is processed by these companies in accordance with the information on the protection of privacy provided by them.

1.3. This data is not intended to be transmitted to third parties other than the persons designated by the individuals concerned, companies (particularly SWIFT SCRL and MasterCard Europe SPRL) in order to carry out one of the purposes outlined above or ING Group companies based in a European Union Member State or not or insurance firms for the purposes outlined hereafter.

It may also be transferred to non-EU countries whether they provide an adequate level of personal data protection or not (for example, payment data communicated to SWIFT SCRL which are archived in the United States and subject to US legislation, the data communicated to ING Group companies not based in another European Union Member State, etc.). ING shall, however, only transfer data to non-EU countries that do not provide an adequate level of protection in the cases laid down in the Data Protection Act of 8 December 1992, for instance where data protection is assured by appropriate contractual provisions.

The individuals concerned consent to the exchange of data concerning them between the companies – existing or to be created – of the ING banking, financial and insurance Group, based or not in a European Union Member State.

The ING Group is a group of companies with activities in banking, insurance, leasing, administration of assets and/or an activity following on from those activities. The aim of exchanging data concerning individuals between ING Group companies based in another European Union Member State is to enable these companies taking part in it to carry out centralised customer management, to have a global view of the customer, to carry out studies, statistics and/or marketing initiatives (with the exception of e-mail adverts and unless the individual concerned objects), to offer and/or provide the aforementioned services and to monitor the legality of transactions (including preventing irregularities).

Furthermore, the necessary data on private individuals is exchanged between ING Group companies established in another European Union Member State or elsewhere if it is required by those companies to comply with legal or regulatory provisions (including those arising from an FSMA circular) relating to their duties of care in respect of customers, the prevention of the use of the financial system for money laundering purposes or for the financing of terrorist activities and to prevent the proliferation of weapons of mass destruction. ING Bank nv (Bijlmerplein 888, NL-1102 MG Amsterdam Zuidoost, The Netherlands), acting as joint data controller, manages the interchange of data on private individuals between companies in the ING Group that is exchanged for these purposes.

Any individual may ask ING for an updated list of ING Group companies based in Belgium, in another European Union Member State or in a non-Member State participating in this exchange of data concerning the private individual. These companies guarantee a high level of protection for exchanged personal data and are obliged to exercise professional discretion as regards this data.

Furthermore, the data concerning individuals collected by ING as an insurance broker is also passed on to the insurance companies concerned which are outside the ING Group and based in a European Union Member State (list available on request) for the purposes of assessment of the insured risk and, where applicable, the issue and management of the insurance policy, marketing their insurance products (to the exclusion of e-mail advertising), centralised customer management and monitoring the regularity of transactions (including preventing any irregularities). Any individual may request a list of insurance companies concerned.

The legal or administrative authorities or the supervisory bodies, in Belgium or abroad – in the US, for example –

may in certain cases provided for by local legislation or regulations (in particular to prevent terrorism) require ING or any company to which the data ING has transferred the data in accordance with the foregoing, to disclose all or some of this personal data on individuals, such as data on Payment Transactions.

1.4. Any individual concerned may access the data concerning him, processed by ING, another ING Group company based in a European Union Member State or not, or an insurance company concerned (outside the ING Group) based in a European Union Member State and, if necessary, request that incorrect data be corrected or illegally processed data deleted.

The individual concerned may, at any time, on request and at no cost to him, object to:

- his personal data being processed by ING for direct marketing purposes;
- his data being exchanged between ING Group companies based in the European Union for the purposes of direct marketing;
- communication of the data concerning him which is collected by ING as an insurance broker to the insurance companies concerned (outside the ING Group) and based in a European Union Member State, for the purposes of direct marketing by these companies.

This will be taken into account as soon as possible

1.5. Neither racial or ethnic data nor political, philosophical or religious data, nor data concerning trade union affiliation or sexuality is processed, unless it appears during payment transactions (for example, a payment order for fees to a political party).

Consequently, the individual concerned authorises this data to be processed in the context of carrying out payment transactions, in accordance with Article 6 of the law of 8 December 1992 on the protection of privacy.

The categories of persons who have access to this data are ING Belgium staff members and if need be, those from companies whose intervention is necessary or from other ING Group companies based in a European Union Member State or from other companies (for example: SCRL Swift, MasterCard Europe SPRL, etc.) which are responsible for processing payment transactions.

If racial or ethnic data is evident from the data identifying the individual concerned (in particular surname, name, address and nationality), the individual concerned also authorizes the processing of this racial or ethnic data, in accordance with Article 6 of the law of 8 December 1992 on the protection of privacy. The categories of persons who have access to this data are ING Belgium staff members and if need be, those from companies whose intervention is necessary or from other ING Group companies based in a European Union Member State or from the insurance companies concerned (outside the ING Group) based in a European Union Member State, responsible for carrying out one or more of the transactions mentioned in points 1.2 and 1.3.

1.6. There is no legal requirement to answer the questions asked by ING or another ING Group company based or not in a European Union Member State or an insurance company concerned (outside the ING Group) based in a European Union Member State, but not answering them may, depending on the circumstances, result in ING or another ING Group company based or not in a European Union Member State or an insurance company concerned (outside the ING Group) based in a European Union Member State being unable or refusing to enter into a (pre-)contractual relationship, to continue such a relationship or to carry out a transaction requested by the individual concerned.

1.7. Personal data relating to the individual concerned is processed by ING and the other ING Group companies, based or not in a European Union Member State, with the strictest confidentiality. However, as electronic communications networks, particularly the Internet, do not offer complete security, respecting privacy can only be guaranteed if the personal data is sent via communication channels expressly indicated by ING as being secure.

2. Home'Bank and Business'Bank services

2.1. Cookies

Cookie files or "cookies" are used in some places of Home'Bank and Business'Bank On line services in order to provide the User with a better service. A cookie is a text file containing information about the behaviour of someone visiting a website. It is created by software on the website server but stored on the computer hard drive of the website visitor. During a subsequent visit to the website, the contents of the cookie can be retrieved by the website.

Cookies generated from using Home'Bank/Business'Bank On line services enable offers of services to be personalised according to the areas of interest of each User by identifying them through the cookie.

These cookies contain data concerning the User such as language selected, which will avoid him having to enter these data again each time he uses Home'Bank/Business'Bank On line services. They record data about the Home'Bank/Business'Bank On line services pages visited by the User and their aim is to carry out information sessions, particularly by recording the information that the User provides in successive forms, in order to avoid the User receiving the same advertisements or other announcements repeatedly. The User data recorded by the cookies is also processed by ING in order to draw up statistics for Home'Bank/Business'Bank On line services and to ensure that the content of these services is improved.

These cookies are kept on the User's computer for a period of 12 months.

Most internet browsers are automatically configured to accept cookies. However, the User can configure his Internet navigator to inform him of each cookie sent or to prevent them being saved on his hard drive. However, ING cannot

guarantee the User access to Home'Bank/Business'Bank On line services in the event of him refusing to save cookies.

2.2. Environment variables

When the User visits the Home'Bank/Business'Bank On line services, the following personal data, called "environment variables", are sent to ING and recorded by ING via the User's navigation software:

- his TCP/IP address (identification number of the User's computer on the Internet network),
- the makes and versions of his navigation software and his operating system,
- the language used by the user;
- all of the information about the Home'Bank/Business'Bank On line services pages visited by the User and those of other web sites through which the User accessed Home'Bank/Business'Bank On line services.

These data are processed by ING so as to be able to take into account the specific configuration of the User's computer so that he can be sent the web pages requested in the correct format. They are also processed to establish statistics for Home'Bank/Business'Bank On line services and to ensure that the contents of these services are improved.

3. Phone'Bank services

Telephone calls in the context of Phone'Bank services are recorded. These recordings and the data they contain are kept systematically by ING so as to enable:

- the processing of the Customer's or the User's transactions, as well as the monitoring of services provided to and/or upon request of the Customer relating to the management of accounts and payments, credits, payments, administration of assets (investments) or insurance;
- centralised customer management and establishing a profile of the Customer;
- monitoring transactions and preventing irregularities.

The Customer may receive telephone calls from ING concerning the transactions he has requested.

These recordings are saved for a period not exceeding that required to achieve the purposes for which they are obtained or for which they are subsequently processed.

ING Contact Centre Belgium SA - Avenue Marnix/Marnixlaan 24, 1000 Brussels - is the subcontractor for processing recordings of telephone conversations in the context of Phone'Bank personalised services.

Subscription to the Phone'Bank/Home'Bank/Business'Bank services implies that the Customer and the User agree to all of their telephone conversations being recorded in the context of Phone'Bank services in accordance with the foregoing.

Copyright © June 2012 – ING Belgium SA/NV – Head office: Avenue Marnix/Marnixlaan 24, B-1000 Brussels – Brussels Register of Companies – VAT BE 0403.200.393 – Tel. +32 2 547 21 11 – Internet: www.ing.be – BIC (SWIFT): BBRUBEBB – Account: 310-9156027-89 (IBAN: BE45 3109 1560 2789). All rights are reserved. Reproduction and circulation prohibited without prior written permission from ING.

