

Your privacy
is important
to us.



Data Protection Statement of KBC Bank NV (formerly 'Privacy Statement')

This Data Protection Statement comes into effect on 1 September 2019

KBC Bank NV operates under the trading name KBC Brussels in the Brussels-Capital Region.

Since 1 July 2018, Bolero and Bolero Crowdfunding services for private individuals have been provided by KBC Bank NV. The data protection statement of KBC Bank NV also applies to those services.

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Preliminary: the salient changes in this version of the data protection (formerly privacy) statement of KBC Bank NV

KBC would draw your attention to the most important changes in this data protection statement of KBC Bank NV.

This version is effective from 1 September 2019

New matters and their consequences for protection of your data:

- Decisions taken by automated means (2.5)
- 'Add account' function in KBC Mobile (3.1, 3.5, 4.9)
- Central Point of Contact of the National Bank (3.1)
- Extended possibilities with regard to instalment loans (3.2)
- Security Deposit Savings Account via the KBC website (3.3)
- Text messages (3.4)
- Commercial modelling and profiling and enhancing customer experience (3.4.2)
- Matters for which KBC requests your consent (3.5)
- Objecting to receiving KBC advertisements (3.7)
- FarmCafe (3.10)
- Investor profiles (4.1)
- Information in the public domain or obtained through third parties (4.2)
- Mobilisation of appropriations (4.11)
- Exchanging personal data with partners (5.4)
- Other processing responsibilities (5.2.3)
- Retention period for commercially valuable information (5.6)
- Requirement for financial ombudsman to address KBC Complaints Management (5.5.2)

Addition to the description of your rights:

- The right to limit processing (2.7)

Part 1: To safeguard your privacy, we must work together

Protection of your data is very important to us. Our aim is to process your personal data in a manner that is lawful, appropriate and transparent. In this data protection statement, we explain which of your personal details we collect from you as a natural person and then process.

In the context of this data protection statement and hereinafter, this means details of yours as customer, possible future customer or other data subject, such as payee or company contact person. Regardless your capacity, your rights are the same and KBC Bank will treat your data with equal care.

1.1 Make sure you read all of this information and look at what action is open to you.

We recommend that you read this information carefully, so that you know the purposes for which KBC can use your data. This data protection statement also contains more information about your data protection rights and how you can exercise them.

KBC Bank may make changes to this data protection statement. The most recent version is always available at <https://www.kbc.be/privacy>. KBC Bank will notify you of every all-important change to the content via its websites, Bolero Online, KBC Touch, the Bolero App or other communication channels.

You will also find more information about the Belgian Data Protection Act on www.gegevensbeschermingsautoriteit.be, the Belgian Data Protection Authority's website at www.dataprotectionauthority.be.

1.2 KBC Bank and the other members of the KBC group take care in how they handle your personal details.

KBC Bank NV is a bank with operations in Belgium and a number of other countries worldwide. KBC Bank NV's head office is at Havenlaan 2, 1080 Brussels. KBC Bank is part of the KBC group (also 'KBC' in the following), which is an integrated bank-insurance group, i.e. KBC is a group of companies that, through close cooperation, create and distribute banking, investment and insurance products and provide financial services).

The KBC group principally focuses on retail customers, SMEs and high-net-worth customers and is mainly operates in Belgium, the Czech Republic, Slovakia, Hungary, Bulgaria and Ireland. Aside from that, the KBC group also operates via companies and establishments in a selection of countries within and outside the European Union. KBC Bank has legal branches in various places including Germany, The Netherlands, France, the United Kingdom and Italy. For example, outside the European Union, this concerns countries or cities such as the United States, China, Singapore and Hong Kong.

Members of the KBC group in Belgium include KBC Group NV, KBC Bank NV, CBC Banque SA, KBC Insurance NV, KBC Asset Management NV, KBC Securities NV, KBC Autolease NV and KBC Lease Belgium NV. The names of some Belgian companies in the KBC group, such as Groep VAB NV and Omnia NV, do not contain 'KBC' as an element. More information on the activities KBC Bank and the KBC group is available at www.kbc.com.

KBC Bank NV is the controller of personal data in the context contemplated in this data protection statement.

Aside from that, KBC Bank also processes personal data on behalf of other KBC group entities, such as where KBC Bank acts as an intermediary for KBC Insurance or KBC Asset Management. In cases such as those, KBC Bank processes the data of customers, insured persons and beneficiaries under insurance policies and under employee profit-sharing bonus programmes of those other KBC group entities. In so doing, it follows instructions issued by that other KBC group entity.

If there are good reasons for doing so, such as are explained in this part 3, KBC may also make data available to other KBC entities, whether in Belgium or elsewhere. Or it can process it if it has been collected lawfully from another KBC entity (in Belgium or elsewhere). Naturally, this is only possible provided there is no legal impediment, such as a confidentiality obligation or a provision of the data protection legislation. Information exchanges concern not just personal data but also for the information on legal persons, such as for the reasons listed above in part 3. The practice of exchanging information on legal persons is particularly justified by KBC's desire to provide the support services it does in a manner that is efficient, mainly because its doing so means that each KBC group entity has the same overview of the customer relationship, complete to the same extent, and that they are all able to issue messages of a commercial nature explaining the KBC group's financial services and products.

1.3 Contact KBC Bank if you have any questions about the processing of your data.

If you have any questions about data protection or if you would like to change your privacy settings, you can contact KBC Bank in any of the following ways:

- By calling into your KBC Bank branch. In some cases, you may be asked to complete and sign certain documents.
- You can consult, amend or stop use of certain data yourself using KBC Touch, KBC Mobile, Bolero Online or a branch ATM.
- By e-mailing mypersonaldata@kbc.be.

Part 2: Your right to privacy.

You have a lot of rights when KBC processes your data. When KBC Bank asks your consent to do processing, you can subsequently withdraw that consent again whenever you see fit.

2.1 You can access your data.

If you want to access the data concerning you that is processed by KBC, let us know. Some data can be accessed direct by you yourself, such as in KBC Touch, Bolero Online or the Bolero App.

If you exercise your right of access, KBC will give you as complete a list as possible of your data. It can happen that some personal data from files such as the usual back-up files, logs and stored/archived records is not included in that list. Such is not data that is processed on an ongoing basis and it is not therefore immediately available. For that reason, it will also not be communicated to you. However, it is removed from those files in line with standard data maintenance procedures.

2.2 You can have your data rectified.

It can happen that certain information that KBC Bank holds concerning you is not (or no longer) correct. You can ask for the data to be rectified or completed at any time.

Customers of Bolero services can change certain details themselves by navigating to the settings menu in Bolero Online and the Bolero App, as well as managing their communication preferences.

2.3 You can have your data erased.

You can ask KBC Bank to erase your personal data. If KBC no longer has an overriding ground for processing your personal data, KBC will erase it. Statutory duties can preclude erasure.

2.4 You can object to your data being used for certain purposes.

If you disagree with how KBC Bank invokes its legitimate interests to process certain data (see 3.4), you can object. We will heed objections unless there are overriding grounds not to do so, such as when we process data with a view to combating fraud.

2.5 You can contest a decision taken by automated means

Some data processing operations and processes are fully automated, without any human intervention. This enables KBC Bank, say, to respond to certain credit card requests more quickly.

Before KBC asks for your personal data, it will inform you on the screens that it concerns an automatically generated decision. KBC Bank discloses the logic of this automatically generated decision and its consequences at the moment of processing itself via a link to the 'Automatically generated decision' annex in this data protection statement. You can consult the 'Automatically generated decisions' document at any time via www.kbc.be/dataprotection.

If you are dissatisfied with the result of such a fully automated decision, you can contact KBC Bank via KBC Live or any KBC branch. You can, for example, ask a KBC staff member to intervene or tell them why you disagree with the decision and request to view the decision taken.

Automated decision-making is often based on an underlying customer profile.

In certain cases, KBC calculates these profiles for all customers in advance. You may exercise your right to object to this profiling (see Chapter 3.4 for more information about customer profiles).

In other cases, KBC will calculate this profile at the time it decides to execute a contract or to have it entered into. Because you are then asking KBC for a decision, you cannot object to this profiling (see also 3.2 and 3.3).

2.6 You can ask for your data to be transferred to a third party.

You are entitled to ask KBC for personal data that you yourself have provided to KBC with your consent or in the process of performing a contract to be transferred back to you or to a third party.

The legislation imposes a number of restrictions on exercise of this right, so that it is not applicable to all data.

2.7 You can ask for processing of your data to be restricted

In some cases, you may ask KBC to restrict processing of your personal data. Exercise of this right is conditional. You can exercise your right to restricted processing:

- during the period needed by KBC to verify the accuracy of your personal data if you challenge the accuracy of personal data concerning you that KBC processes;
- where processing is unlawful but you do not want the personal data erased;
- when KBC no longer has a purpose for processing the personal data but still needs it in connection with a legal claim;
- pending KBC's reply to whether KBC's legitimate interest weighs more importantly than yours when you have exercised your right to object to processing for which KBC invokes its legitimate interest as legal cause.

2.8 You may exercise your rights.

Be as specific as possible when you exercise your rights. KBC Bank can only properly answer queries couched in sufficient detail. KBC Bank will need to be able to verify your identity in case someone else tries to exercise your rights. KBC may therefore ask for a copy of your identity card when you make such a request.

For further questions or comments, you can go to your KBC branch, your KBC Insurance agent or e-mail them to mypersonaldata@kbc.be. This is your first resort for all enquiries regarding data protection.

If you have a complaint concerning exercise of your rights, KBC Complaints Management will be happy to look into it.

- KBC Complaints Management, Brusselsesteenweg 100, 3000 Leuven, or via e-mail (complaints@kbc.be).
- Also via KBC's electronic channels KBC (including the KBC website, KBC Touch, Bolero Online and the Bolero App).

If you cannot obtain adequate resolution of the matter by the above routes, you can contact the 'Data Protection Officer' at KBC Bank by writing a letter to KBC Bank NV, Group Data Protection Unit (Group Compliance), Havenlaan 2, 1080 Brussels, or e-mailing dataprotection@kbc.be.

If you would like more information or if you do not agree with the standpoint adopted by KBC Bank, be sure to visit the website of the Belgian Data Protection Authority at www.gegevensbeschermingsautoriteit.be. You can also lodge complaints there.

In some cases, you can also exercise your rights directly against third parties. That applies, for instance, to the databases that the National Bank of Belgium (www.nbb.be) maintains, such as its Central Individual Credit Register, its Central Corporate Credit Register and the NBB Central Point of Contact.

Part 3: KBC Bank has many reasons for processing your personal data.

3.1 KBC Bank must comply with laws and legal requirements

The main legal grounds for KBC Bank having to process certain information concerning you are summed up here.

- Financial institutions are required by law to share certain information relating to their customers and proxy holders with the Central Point of Contact of the National Bank of Belgium, de Berlaimontlaan 14, 1000 Brussels, Belgium (www.nbb.be). Consequently, KBC is required to share information regarding its customers' and proxy holders' identities and their financial contracts, including information relating to:
 - the opening and closing of accounts, and powers of attorney for those accounts, including the date and the account number;
 - cash transactions;
 - the conclusion and termination of financial contracts and the applicable dates, such as: contracts for safe-deposit box rental, specific investment services, loans, including mortgage loans, repayment loans and open-ended credit facilities.

If any information registered with the Central Point of Contact by KBC is incorrect, you can request that it be corrected or removed.

The Central Point of Contact registers the information and keeps it for a period of ten years for tax investigation, verification and collection of certain receipts, investigation of criminal offences, to combat money laundering and the funding of terrorist activities and major crimes, solvency investigation in the event of collection of confiscated amounts, data collection by intelligence and security services, bailiffs in the event of attachment, and notarial searches related to tax returns for estates. Access to the information held by the Central Point of Contact is regulated by law. The National Bank of Belgium keeps a list of all requests to access information held by the Central Point of Contact for a period of two calendar years.

You will find all of the details regarding the Central Point of Contact for accounts and financial contracts in the Act of 8 July 2018, and in Section 322, Subsection 3 of the 1992 Income Tax Code and its implementing decrees.'

- Banks must deploy all possible means to prevent, uncover and/or report instances of money laundering and financing of terrorism to the authorities. This is a matter of considerable public interest. KBC Bank must therefore take the necessary steps for this, at both central and local levels. For example, they have to gather data on customers and groups of customers or issue risk alerts.
- Specifically, KBC has to:
 - identify you as a customer, representative or ultimate beneficial owner;
 - verify your identity;
 - determine your profile (in relation to the risk of money laundering), which involves collating various personal and business details, such as whether you're a politically exposed person;
 - check your actions and transactions and prevent certain transactions and report them to the Financial Intelligence Processing Unit.
- In doing so, KBC Bank uses details given to it by you yourself plus data that can come from other channels (like Thomson Reuters's World-Check, Graydon, Dun & Bradstreet, Swift and Internet search engines).
- For example, KBC Bank has to be in possession of a recent copy of your identity card. KBC will therefore scan in your digital identity card (e-ID) as a matter of course, for example if you register at a KBC ATM with your e-ID and PIN or if you use your e-ID to confirm changes to your address or contact details as held by KBC Bank. KBC Bank is conscious to only store the information it downloads from your e-ID card that it is required to hold by law (that is, the money-laundering legislation, which includes the Act of 18 September 2017 and the 4th Anti-money-laundering Directive (EU Directive 2015/849)).
- Banks are also required (including at group level) to prevent, uncover and report improper use of inside knowledge and market manipulation and to notify suspect dealings to the authorities (see inter alia Articles 16 and 17 of the Market Abuse Regulation of 16 April 2014).
- KBC can use personal data for the purposes of checks, investigations and opinions in areas subject to compliance considerations (like prevention of money-laundering and fraud, investor and consumer protection and data protection).
- Banks are responsible for recording transactions in their books of account (required under the accountancy legislation, including the Royal Decrees of 23 September 1992).
- In the context of the part they play in fighting terrorism and their obligations under sanctions rules, banks are required to screen customer details against sanctions lists. Transactions are also monitored. In some cases, underlying documents are requested and payments may be held back (see the sanctions legislation as well as EU Regulations 2580/2001 and 881/2002). Here, too, KBC Bank uses outside sources such as World-Check van Thomson Reuters.

- For payment transactions, banks have to pass details of the originator or payee to the receiving or transferring institution regardless of where it is established (e.g., Section 3 of part VII of the Economic Law Code plus its implementing decrees).
- Banks have to consult certain databases for given types of credit (including current account overdrafts) or to enter information in those databases about the terms and conditions of the relevant agreements and the extent to which they're complied with.
- For example, they can:
 - determine your borrowing options and repayment capacity, or make it possible for other institutions to do so;
 - perform risk management;
 - allow the National Bank of Belgium to perform scientific and statistical research and to do the work devolved upon it by law.
- As a rule, KBC Bank refers to the Central Individual Credit Register for all grants of consumer credit. The Central Corporate Credit Register keeps the data available for viewing for one year following the calendar month it relates to (under the lending statutes including the consumer credit and mortgage security acts and the Central Individual Credit Register (Chapters 1, 2 and 3 of Section 4 of Part VII of the Economic Law Code), the secondary Central Individual Credit Register legislation (Royal Decree of 7 July 2002), the Act on the Central Corporate Credit Register of 4 March 2012 and the secondary Central Corporate Credit Register legislation (Royal Decree of 15 June 2012).
- MiFID II (the Second European Markets in Financial Instruments Directive) requires banks to allocate their customers to certain categories. Natural persons automatically qualify as non-business customers (or retail customers), although they can require reallocation as business customers in particular cases. Banks rendering investment advice require to collect information appropriate to the relevant category on customers' knowledge and experience, financial resilience, investment objectives and posture towards risk and return in connection with products offered to them (see the provisions transposing MiFID II, including the Act of 2 August 2002 and the Royal Decree of 3 June 2007). In addition, under MiFID II banks have to examine whether customers form a certain product's 'target market'. Banks whose offering is limited to 'execution only' services such as the Bolero platform, also have to collate information according to customer category, which will mainly relate to the customer's financial knowledge and experience.
- Banks also have responsibility for identifying account holders and the beneficial owners of accounts, safes or insurance products in the context of reviving dormant accounts, safes and insurance products (see the Act of 24 July 2008 and the website at www.slapendetegoeden.be to find out more).
- Banks are responsible for appropriately controlling risks (including at group level). They are required to detect, prevent, mitigate and address risks. Examples include credit, insurance, counterparty and market risk, risks concerning information management and statutory compliance, the risk of staff, customer and/or supplier fraud, the risk of unethical behaviour by staff or breaches by them of their duties of care. Risk management has to be ensured at both central level (gathering data on customers and groups of customers) and local level (e.g., circulating risk alerts). In this context, all forms of risk profile are moreover stipulated (see the provisions governing credit institutions, inter alia the Credit and Stockbroking Institutions (Status and Regulation) Act of 25 April 2014 and the Insurers and Reinsurers (Status and Regulation) Act of 13 March 2016).
- Banks also have to respond appropriately when you exercise your rights under the data protection legislation: they are also required to answer questions from the Data Protection Authority, such as if a complaint is made.
- Banks have reporting duties and need to respond to questions to and from the authorities and bodies with supervisory duties relative to financial institutions such as the Financial Services and Markets Authority (www.fsma.be), the National Bank of Belgium (www.nbb.be) and the European Central Bank ('ECB' – in the context of certain of its oversight functions, including the Credit and Stockbroking Institutions (Status and Regulation) Act of 25 April 2014 as well as the Act of 2 August 2002 (AnaCredit reporting)).
- Upon a customer's death, the tax legislation contained within the Inheritance Tax Code requires banks to file an official list of the deceased's assets with the authorities (such as the Inheritance Tax Code).
- Banks have to respond to queries from the tax authorities or may need to voluntarily exchange information for the purposes of tax law (the Income Tax Code, the Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS)).
- Banks also have to respond to enquiries put to them by the courts administration (covering law enforcement right from the police, through investigating judges and prosecutors to trial courts) and especially concerning matters falling under the police statutes and court procedure in general (whether civil (Judicial Code) or penal (Criminal Investigation Code)).
- As provided by law (PSD2), KBC as bank is obliged to provide access to the balance and transaction information of its customers' payment accounts, insofar as the customer has installed an online app. This access is only granted to third parties that are authorised to operate in Belgium (including other banks) and based on the consent granted to these third parties by the customer. KBC does not have the right to verify the validity of the consent granted to such third parties. .

3.2 KBC Bank has to be able to judge whether it is feasible to contract an agreement or service.

Before KBC Bank contracts, it may be necessary for certain information to be processed in order to deal with the application and assess properly whether the agreement can be contracted and, if so, under what terms and conditions.

An example is information collated and processed when a credit application is received (whether it is secured by a primary or secondary guarantee makes no difference here).

Some merchants make arrangements under which they act as credit intermediaries to procure customers KBC instalment loans.

Here too, KBC must judge the advisability of contracting an agreement with the consumer. In so doing the merchant passes personal data to KBC.

3.3. KBC Bank has to be able to perform contracts correctly.

As a customer of KBC Bank, you use various services and your doing so renders administrative and accounting processes incumbent on KBC Bank. Examples of processing for the performance of contracts include the administration of accounts, payments, deposits, lending, credit monitoring, monitoring security arrangements, safe rentals, custody, financial instrument transactions, investment advice or wealth management paying due regard to your investor risk profile, selling insurance and brokering financial leases.

In the course of these actions, KBC Bank may have occasion to pass certain personal data to an intermediary or counterparty (e.g., an insurer, a broker or a custodian). When you perform a payment transaction, KBC Bank passes the payee information on the transaction's progress (e.g., general information on why the payment is not passing via a direct debit).

Security Deposit Savings Accounts can be set up on the KBC website by the tenant or the landlord: the facility is open to both but it's the tenant, who becomes the holder of the Security Deposit Savings Account, who is the bank's customer. And the tenant's personal details, like every other customer's, get processed by KBC. The landlord, on the other hand need not necessarily be a customer of the bank's. But because we have to be able to identify them and the subjects of let in respect of which the escrow is bailed, we also process certain necessary personal details of the landlord's.

To be able to give investment advice that's more personal to you, KBC Bank combines the information in your investor profile with certain other details (such as your age and your investment horizon) to gauge your attitude to losses you might incur.

KBC Bank engages in bank-insurance business and therefore works closely together with KBC Insurance. To facilitate this, KBC Bank and KBC Insurance have a large sales network of bank branches and insurance agencies. To provide you with a good service, it is important for us to share information within our organisation and to group that information together in the hands of (central) relationship managers.

There are various channels by which you can communicate with KBC Bank, such as KBC Touch, KBC Mobile, Bolero Online and the Bolero App. KBC Bank may occasionally use contact and security information for those communication channels to communicate with you and to carry out check procedures. Examples include login details, passwords and certificates.

3.4 KBC Bank has to be able to function as a business

In addition to the purposes set out above, KBC Bank and the KBC group as commercial undertakings have certain ulterior legitimate interests on the basis of which they process personal data. In that regard, KBC ensures only a minimum let-up in the protection that is afforded to your data and, in all events, that KBC's legitimate interests remain proportionate in consideration of the extent to which your data's protection is impinged upon by engaging in such processing. Nonetheless, if you harbour an objection to this use being made of your data, you may exercise your right to object. KBC will respect your objections unless KBC has compelling reasons for not doing so.

And so it is that KBC processes personal data in various situations:

3.4.1 Controls, security and measures to prevent fraud

- KBC Bank uses your personal data, including transaction details to conduct studies, create models and generate statistics for various purposes: regulatory reporting, more effective internal control, fraud analysis and combating fraud, risk analysis, security and other non-commercial purposes. KBC severs the link with individual persons if possible. KBC may subsequently apply them generically or to individuals.
- KBC sets risk alert levels as well. Risk alerts are issued when a data subject incurs loan-repayment arrears, the social security authorities sue following insolvency or after a case of fraud. Risk alerts can have the effect of precluding the data subject from taking up or continuing to take up certain products or services.
- KBC may utilise personal data for the administration, (risk) management and oversight of the KBC group's organisation, such as the legal department (including dispute management and legal risks), risk management (such as credit risk and insurance risk vis-à-vis customers and groups of customers worldwide), risk functions and inspections, complaints management and internal and external audit. We retain personal data for ease of citing the evidence it constitutes if needed at a subsequent juncture. Storage may be entrusted to outside third parties.
- KBC may also utilise personal data for determining, exercising, defending and preserving the rights of KBC Bank or persons whom it might represent (e.g. in disputes).
- Data processing may be done to ensure that persons and goods are safe, de facto secure and under visual guard.
- KBC can use your personal data to prevent, detect and investigate fiscal fraud in conjunction with (Belgian) payment systems and providers of other payment services.
- Personal data, including biometric data can be used for various purposes, including to detect and put a stop to fraud and cyber risks. Biometric data that KBC processes for the purposes of fraud or cyber risk detection is not processed by KBC for unique identification purposes.
- KBC processes personal data, including transaction data in order to gauge your knowledge and experience in relation to investments with a view to protecting investors (MiFID).
- Whilst apps are being developed, tests need to be carried out using personal data, including the final acceptance test before an app is put into production.
- KBC may process personal data in the course of investigating issues in apps.

- Incident management solves issues at customer level. When IT systems' integrity ceases to be a given, KBC can resolve issues by recreating missing factors. When it does this, KBC processes personal data.
- Even though there might be no legal obligation to verify the Central Individual Credit Register, KBC always does so when lending to consumers.

3.4.2 Commercial modelling and profiling and enhancing customer experience

- KBC Bank uses your personal data, including transaction data on your KBC accounts, to conduct studies, create models and generate statistics for various purposes, like direct marketing, including personalised offerings on KBC's and KBC partners' products and services (see 3.6), personalised pricing, and improving service. To perform these studies, create these models and generate these statistics, KBC severs the link with individual persons if possible. KBC may subsequently apply the model generically or to individuals.
- KBC Bank also uses your payment transactions and some basic data, like your place of residence, to create models in order to offer personalised discounts on third-party products and services to the customers who opt in. KBC will be launching such a service for its customers in the near future. To make this service work, KBC needs models. KBC does not pass on any personal data to these third parties. To create these models, KBC severs the link with individual persons if possible.
- Insight gained from analytical models lets KBC build customer profiles. KBC Bank uses them to offer customers KBC's and KBC partners' products and services (see 3.6) or to determine the commercial policy for a particular customer.
- Combining data from various KBC group companies in these analytical models makes it possible to gain data-driven insights that underpin the KBC group in making strategic choices and in developing the commercial policy.
- KBC can utilise personal data to support and simplify the processes of customers beginning to use, using and ceasing to use products and services, including avoiding resubmitting information you've already before. To avoid your having to go through an entire ID verification process if you want to become a customer elsewhere in the KBC group. Thus, KBC Bank may pass details of your identity to other companies in the KBC group in order to speed up their process of verifying your identity, and also text you relative to services you've requested from us, for instance in order to make them easier for you to use.
- KBC can use your personal data to make you a better offer than at present or to give you a commercial discount.
- If you started a simulation or sales process but stopped before completing it, we may contact you to see what went wrong and whether we can help. We also do this when we haven't got 'marketing permission' from you to use all your personal data to provide you with personalised information, but we limit our contact in this case to providing technical and administrative support for this specific process.
- KBC Bank aggregates details identifiable as yours to the stage where they are no longer personal data in order that they can be publicised, for instance when, at the ideal homes exhibition it wants to publish statistics on the numbers of home loans applied for or granted. KBC Bank may at the same time carefully draw anonymised insight from personal data and subsequently offer that insight in the market.
- KBC may also collate together personal data that KBC entities have at their disposal for creating segments (such as private individuals, businesses and private banking).
- To be able to give accurate responses to other customers or prospects) and where KBC Bank offers its spontaneous proposals in bespoke form, it can be that KBC Bank will look at all or any of your own customer profiles for comparison purposes as part of carefully partitioned-off underlying processes. There is naturally no question of your personal data being divulged to anyone in this context.
- KBC may text you to confirm an appointment or remind you that you've missed an insurance policy renewal or a loan repayment or that your account is insufficiently funded for a payment order to be executed. You can switch these notifications off in the menu for managing your text message settings.
- KBC enables customers to text via WhatsApp to KBC experts who can answer general enquiries and communications or can pass you to someone better able to assist you.
- KBC can send you certain offers and advertising. Sometimes we do this on the basis of legitimate interest. For more information on the use of personal data for direct marketing purposes, see 3.6.
- KBC Bank also uses transaction details in order to use certain digital KBC channels to categorise your income and expenditure or to offer insights into your transactions. This allows you yourself to then keep tabs on your income and expenditure, and to get started with the insights. You can also turn off both functions. You will find more information on this in the 'Income and expenditure' section or the 'Insights' section in those digital channels (e.g., KBC Touch or Bolero Online).

3.4.3 Setting the KBC Strategy

- KBC can use your personal details to create synergy, heighten efficiency and produce other benefits for its organisation and processes.
- KBC can collate personal data held by KBC entities and use it in, or in support of, the implementation of worldwide group-level centralised, coordinated, efficient management of customers and customer groups.
- KBC may use your personal data in positioning itself vis-à-vis its direct and indirect competitors.
- KBC may use personal data in evaluating, simplifying, testing or improving its processes, digital apps and standard-form documentation and to optimise promotional campaigns, simulation exercises and online sales, such as by using information from cookies (such as preference settings and browsing behaviour on our website) to follow up on a simulation left uncompleted, statistics

or a satisfaction survey.

- The dealings of KBC's 'Corporate Mergers & Acquisitions' team (M&A) extend over all and any types of KBC products and services. It is possible that, in the process of acquiring or disposing of some part of its business or another, KBC might exchange personal data with companies in the KBC group and third parties.

3.5 KBC will request your consent to process your personal data in certain cases.

For consenting to direct marketing, further details are given in 3.6.

If KBC requests consent to process personal data, it will be in the context of the following situations:

- To process personal data at another bank based on the accounts of other banks that you as customer have added in a KBC app, for example KBC Mobile;
- To process your health data;
- To geolocate you;
- To use contact details left by you such as in a simulation or competition entry form in order to advertise something to you at a later stage;
- To pass personal data concerning you to another data controller;
- To perform identity checks on you using biometric details;
- To respond to third-party enquiries.

However, the situations described do not always require consent and KBC therefore sometimes uses another legal cause for the processing. For example, KBC sometimes is under a statutory duty to answer questions from third parties or this is contractually required.

3.6 KBC Bank uses your personal data for direct marketing

As a commercial enterprise, KBC Bank is keen to propose its wide range of financial products and services to you. It may do so in response to explicit requests or where it has an idea that you might be interested in or could benefit from a given product or service.

We can reach out to you with this information in all sorts of ways: through KBC Bank's branches or KBC Insurance's agencies, over the Internet and in apps, by e-mail, post or telephone, and at events. In addition, the constant flow of new technologies gives KBC Bank new ways it can embrace to serve you better. KBC is at pains to ensure that information is provided in a way that's clear and will choose the most appropriate channel to ensure the inconvenience of being disturbed is kept to a minimum.

If you give explicit consent to receive personalised information, KBC can make proposals tailored perfectly to your individual situation. You will no longer receive screeds of adverts that are of no interest to you. In this regard, KBC uses your entire personal data (including transaction details and information obtained from third-party sources (such as financial institutions), public sources like the official gazette, the results of discussions at your branch and other contacts). This data is collated along with details of your family and business, and so on, so that KBC is really in a position to provide you with information that's tailored to you. You can withdraw your consent at any time, just as easily as you gave it.

Your consent to receiving bespoke information is valid for each of KBC Bank, KBC Insurance, KBC Asset Management, CBC Banque and KBC Autolease. As regards KBC Autolease, your consent only applies to services that it provides direct to private individuals. These KBC entities are then able to share your details with one another. Such exchanges are also possible if you're not, or you are no longer, a customer of any KBC company. This enables KBC companies to look into your situation and proactively suggest alternatives aimed at your specific situation.

Your consent to bespoke information also counts for offers from carefully selected partners of KBC that offer products and services in the general fields of banking or insurance. Those partners must at all times meet the following criteria.

- They must be a provider of financial services or an insurance company. Financial service providers include banks, credit institutions, wealth managers, funds, stockbrokers and lease companies in as far as their offering to private individuals is concerned.
- If legally required, the partner has to be licensed for the financial service or insurance that KBC is offering.

The information is provided to you by KBC and not the partner. That way, data processing by the partner is limited and they only receive details about you if you yourself manifest interest in the information;

KBC has contractual arrangements with partners, in which they confirm that they abide by the data protection laws.

KBC declines to form partnerships with undertakings that have recently been found guilty of serious breaches of the data protection legislation.

The information concerns products and services from the general fields of banking and insurance such as savings products, investment funds, lending and insurance (both property cover and life insurance).

A list of our current partners can be found at www.kbc.be/partners.

KBC sets certain limits on its operations:

- KBC Bank does not make commercial offers to young persons aged under 16 unless a legal representative of theirs has consented.
- KBC does not use spyware.

If you do not want to receive a highly personalised offer, you should not consent to receiving personalised information.

But, even in the event that you do not give your consent, it may still happen that you receive offers and advertising from KBC Bank. For those basic forms of offering, KBC Bank uses only a limited number of details (such as who you are and where you live, your date of birth, your marital status, your contact details, family relationships, the apps and products you have, or any lack of interest on your part in certain products). In these cases, KBC Bank can only propose KBC Bank's or KBC Insurance's own products and services or those of KBC Asset Management & Markets but not those of other KBC entities or partners. In this regard, KBC Bank's acts in accordance with its legitimate interests. KBC completes the limited data set with your usage patterns on its websites and apps, albeit only if you agree to the use of cookies.

You are under no obligation to take up any offers KBC sends you, but we wouldn't suggest something unless we believed it would truly be of service to you.

3.7 What if you don't want to receive any direct marketing at all from KBC?

Perhaps you've no desire at all to receive direct marketing from KBC. KBC respects that. An ordinary request is enough to exercise your right to object to direct marketing. Simply e-mail mypersonaldata@kbc.be, drop in at your branch of KBC Bank or you KBC Insurance agency or contact our staff at KBC Live.

3.8 KBC will not sell your personal data

KBC Bank does not sell or hire your personal data to third parties for their own use unless you opt for this yourself and give your consent. KBC can nevertheless offer anonymised insights into the market, framed to reflect the fact they are derived from your personal data so long as those receiving the insights are unable to ascertain the identity of the person whose data was processed. You can also object to your personal data being used to generate insights.

3.10 FarmCafe

KBC develops discussion forums like FarmCafe, which shares contact details and information with those taking part in a discussion.

Part 4: KBC Bank processes different sorts of data

The sorts of data that KBC Bank processes are explained below.

4.1 Identification, details linked to a service and personal particulars

DETAILS OF IDENTITY	
Name, sex, date of birth, nationality, identity card number, customer number, national registration number, vehicle registration number, driving licence, your fingerprint as used to log in to your smartphone, click data, how you utilise your device, information identifying the devices you use (Mac address, IPs, information uniquely identifying your device).	
CONTACT DETAILS	
Telephone number, e-mail address, language, postal address, user names in social media apps.	
DETAILS LINKED TO A SERVICE	
Your products.	Account numbers, your financial products (payments, loans, insurance, savings & investments).
Your product usage.	Your transactions, salary and other income and expenses, growth of your wealth, changes in your wealth situation, investments, loans, insurance policies, movements on your accounts and their balances, the use of KBC apps, and so on.
Your preferences and interests.	Your potential interest in KBC products. Your financial information, how it has changed over time and the advice we've previously given you.
Derivative information	Based on movements such as payment transactions (transactions on your accounts, in your investment portfolio, done using your card, etc.), KBC Bank is able to observe your behaviour and detect your needs. We can use the resulting profile for instance to more effectively analyse which payment solution works best for you, your preferences in terms of communication or which insurance products you need. KBC can offer a commercial discount.
PERSONAL PARTICULARS	
Your family situation	Your marital status, the make-up of your household and relations.
Your overall financial situation	KBC Bank can give you sounder advice if it is apprised of your overall financial situation (your total assets, real estate you own, etc.).
Your job of work	Your education, occupation and work experience.
Key moments in your life	The important phases in your life (past, present and future) like getting married, living together, building a family, plans for the home or the death of a child, parent or your spouse.
Your lifestyle	Things like leisure activities and interests, club memberships, your home environment and property owned by you.
Your feedback	Comments and suggestions, past complaints. These can definitely help KBC Bank to provide you with a better service in the future.
Your investor profile	KBC processes your investor profile in order to assess whether a given investment is appropriate for you. When other information is added such as age and investment horizon, KBC can also process your risk profile and determine how you cope with investment losses, so that it can provide even more targeted investment advice.

Details of your health	KBC processes health details, for example when providing tax and legal opinions or financial planning advice or for taking out life insurance. When it intends to do such data processing, KBC procures your separate consent. Naturally, strict procedures apply to how this health data is processed.
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4.2 Public data and data obtained through third parties

KBC Bank sometimes processes information that is a matter of public record.

- It could be information that's subject to a reporting duty (like public notice of your appointment as a company director).
- Data you yourself place in the public domain such as information on your website, your blog or via your publicly accessible social media profile, or information about you that KBC Bank has obtained from third parties (e.g., members of your family).
- Or data that is in the public domain, say, because it is common knowledge in your area or because it has appeared in the press. Information from sources such as the companies register and Graydon also fall into this category.

KBC Bank may also receive personal data via third parties, for example by buying it from companies such as Bisnode, GIM or Graydon, which are responsible for making sure that they gather the relevant information lawfully.

In addition, KBC receives personal data from third parties on the instructions of its customers (e.g., account information from an account held at another bank in connection with the provision of account information services).

KBC uses that publicly available data and information from third parties for all processing for all purposes set out in this data protection statement. The information can play a role in checking the accuracy of details held in our records, developing analytical models and profiles in support of (direct) marketing campaigns.

4.3 Your current location can be important

If KBC Bank wants to geolocate you, KBC will always ask your consent as standard. KBC Bank asks you for that consent when you visit certain pages on its websites or if you, say, use a KBC app or a new technology such as beacons.

You'll then be given further information on what KBC Bank is using your location for. It might be to tell you where the nearest KBC branch is, for instance. Or KBC Bank may text you on a matter for which your location is important. Or, if you are at a KBC event, the background in KBC Mobile might be changed in keeping with it, for example.

In order to offer you this service, KBC uses a geolocation service provider (Google). Google has a privacy policy of its own. You can read it in detail at www.google.com/policies/privacy. We recommend that you take the time to go through it. KBC Bank can also use the details of your location to construct global models and analyses.

Moreover, we are aware of your location on the basis of things like your IP address and your telephone's technical readings. This information can also be important in relation to things like detecting credit card fraud and improved data protection.

4.4 KBC Bank retains data from simulations, contest entry forms, etc.

When you fill in a KBC Bank form, we naturally process the data needed to administer the process that you completed it for. That means the information you enter to do a simulation may be stored in the meantime, which saves you having to enter it again if you interrupt the process or want to start from scratch later.

So that it can evaluate the process, KBC Bank may ask you why you broke off in the middle, at least if you'd been properly identified when you did (by logging into KBC Touch, for instance).

The scope of the permission you give for KBC Bank to use your personal data will be heeded by us in assessing whether we can use the information on the form to approach you at a later date and whether it can do so with information, advertising or proposals specially tailored to you.

Form filling can be time-consuming (especially for complex simulations). Always provide us with the details we need to fully identify you as a customer.

- If you do, the app won't ask you for certain information but instead pre-populate the form with data that KBC has on record. You'll still sometimes be asked to check that the information is complete and up to date.
- Some details will be pre-populated on the form if they are available; you will still be able to make changes.

4.5 KBC can process what you tell its staff.

When you contact KBC Bank staff at a branch or by telephone, chat or some other channel, it's generally recorded:

- to constitute a record of contacts between bank and customer;
- so that there is a (short) record of the contact;
- as a reminder for things that still need doing.

Even if you are not a customer, KBC Bank will store such information as you disclose. That information can be used if you become a customer subsequently.

By adopting this approach, KBC Bank seeks to avoid your having to constantly provide information or answer questions a second time. It also allows KBC to improve continuity in the services provided to you.

4.6 Monitoring KBC correspondence in written form

If you contact KBC Bank by e-mail or have digital communication channels that are used by KBC Bank (e.g., KBC Touch or KBC Mobile), it can use them to send you mandatory and official notices.

KBC works on the assumption that correspondence sent to staff members in their capacity as KBC employees (at a branch or on its fax or to a job-linked or personal KBC e-mail address, etc.) is business-related and that KBC is entitled to read it in the context of:

- their duties;
- the production of evidence;
- workplace checks;
- security;
- fraud prevention;
- service optimisation and/or continuity, including the use of automated text analysis and editing to help KBC staff correspond with you quickly and efficiently.

4.7 Recording telephone, video and chat conversations

KBC Bank may listen in to or record conversations with you, such as telephone conversations with commercial staff in the branch network or at KBC Live, contact centres and helpdesks, Private Banking branches, our inheritance experts, the Bolero Call Centre and the dealing room.

It does so for purposes related to training and coaching its staff and improving the quality, security and oversight of processes, for brief periods of six months.

However, KBC Bank may also do so as evidence of orders that are given to it. In the context of legal duties intended for the protection of investors (MiFID II), KBC Bank is required to record and retain telephone conversations and electronic communications that could result in transactions in investment products. KBC Bank therefore records the conversations and electronic communications of staff whose work duties are investment-related. If you talk to these experts, specialists or relationship managers or communicate with them electronically, we record it. For evidential purposes and in order to comply with the legal obligations imposed further to MiFID II, KBC Bank keeps recordings for ten years. If a dispute arises, KBC will keep them for as long as it needs to defend itself.

KBC Bank can also conduct automated analyses of conversations in order to speed up and improve how it provides its services. Telephone, video and chat conversations, together with other communications and the emotions expressed in them, can therefore be used in the development and training of artificial intelligence. Artificial intelligence could ultimately allow written or spoken customer communication to be fully automated. Artificial intelligence can support KBC staff and increase KBC's ease of access. The link to personal data is severed as quickly as possible when developing and training artificial intelligence.

4.8 Temporary storage of security camera images

KBC Bank may use CCTV in and around the offices and premises where it operates. In the case of security cameras, KBC observes the special rules that apply. If a security camera is present, KBC informs you by means a clearly visible sticker, for instance. In addition, KBC Bank in all events adheres to the 'besafe' guidelines issued by the Security & Prevention General Directorate of the Federal Public Service for the Interior.

KBC generally keeps images recorded by security cameras in and around KBC Bank premises (identified with a sticker) for no more than one month. They can be kept for longer:

- if the recorded images serve as evidence of certain dealings or may depict a criminal offence or unruly behaviour;
- as evidence of damage or loss or in order to identify a criminal or miscreant, witness or victim;
- where a right of access is exercised, for as long as necessary to respond to the request;
- at locations that present a heightened security risk, the period is three months .

If you have questions about CCTV images, you can contact the CCTV Contact Centre at Egide Walschaertsstraat 3, 2800 Mechelen, or at CCTV@kbc.be.

4.9 Transaction details

KBC offers account information services and payment services, giving it access to the balance and transaction information of a customer's accounts held at another bank, provided that such payment accounts are accessible online. This information, for which the customer has given consent for processing, is used by KBC to carry out these services and to display the information in the 'add account' function in KBC Mobile. KBC also uses this information to carry out its anti-money laundering and embargo inspections, to monitor and prevent payment fraud and to draw up the required reports. Such activities are mandatory, in accordance with applicable legislation.

If you give your consent, KBC will also use this information to enrich its commercial models and customer profiling, so that the bank can offer its customers an even more accurate and personalised service (see paragraph 3.4.2). In this case, the direct marketing actions are carried out based on your enriched profile. You can withdraw this consent at any time by toggling 'Data from other banks' under 'Profile', 'My privacy' in the mobile app.

4.10 It can go beyond your own personal details

For instance, if you have a company or children, for example, you agree that KBC Bank can also keep a record of those relationships and process the details of any associated persons. We can also process personal details of parties we have no direct relations with but who are involved in a relationship with us, like being the beneficiary under a life insurance policy or as a usual driver under a car insurance policy, or as a witness to an accident. If you provide information about your family members or related persons, we ask you to inform them of that fact (e.g., of a change of address that you've forwarded to us). If needed in order to properly provide services to your family, we may also report limited details on you to your family members, so as to avoid over-insurance for your family.

This has the following implications for legal entities.

- You agree that you're amenable to KBC's processing data relevant to the relationship with associated legal or natural persons as well as the details of those entities (e.g., parent company, subsidiaries, representatives, ultimate beneficial owners).
- In addition to the personal details of contact people, KBC also naturally stores details of your business.
- KBC processes personal details of contacts at other banks within its Financial Institutions Group department for commercial purposes or investor relations.
- All KBC entities in Belgium and elsewhere can retrieve and use details of legal persons that are KBC group customers. This can be done on the grounds set out in part 3.
- The data that we can share on legal entities covers all aspects of the customer relationship: products held, a (historical) summary of transactions and contacts, (where applicable) the corporate group the customer belongs to and details of designated contacts.
- Please note that legal entities may only provide us with personal details of natural persons associated with them if those persons are sufficiently informed of this and, where necessary, have given their consent.
- Legal entities will be liable to indemnify KBC Bank in respect any claims against it in this regard (vis-à-vis those concerned). For example, the company is responsible for complying with the data protection legislation when it submits lists of users for online apps or of beneficiaries of employee profit-sharing bonus programmes.
- KBC uses the contact details of representatives of legal entities to make appointments via the representative with the legal person, issue it with a commercial proposition and for relationship management purposes.

4.11 Mobilisation of appropriations

If a credit claim is mobilised from a credit agreement, we may disclose the obligations and, based on legitimate interest, the necessary details of the borrower and guarantor concerned to the transferee for the management of the claim. Mobilisation of credit claims is effected, among other things, in the form of mobilisation, assignment of receivables and in the context of covered bonds. The recipient guarantees the confidentiality of the data.

KBC Bank may disclose information about the credit agreements and the way in which they are executed to:

- all stakeholder third parties with a legitimate interest (such as the National Bank of Belgium) or third parties to whom the credit agreement may be transferred or assigned;
- to parties that can assign a rating to relevant mobilisation transactions.

To improve the operation of market forces when credit agreements are converted into securities, the European Central Bank and the EU authorities impose reporting requirements. These reports are not by named individual but by contract detail (such as number of borrowers, term and due date of the credit, outstanding credit amount, payment arrears, characteristics of the mortgaged pledge). This information must be made available to investors in these financial instruments (often designated as asset-backed securities or residential mortgage-backed securities). You will find more information on this on the website of the European Central Bank: www.ecb.int (keyword: loan-level).

Part 5: On cooperation, confidentiality and security

5.1 Not everyone at KBC can look at your data

Only those with appropriate authorisation can access personal data, and then only if it is relevant to the task they do.

In principle, within KBC Bank and the KBC group, your personal data will only be processed and viewed by certain departments that:

- you have, had or want contacts or contracts;
- need to be involved in the provision or aftercare of services;
- fulfil legal requirements (at group level) or requirements imposed by regulators or stemming from corporate governance principles;
- that are tasked with preventing fraud, including money laundering, by employees and customers.

Some examples:

- When we are notified of the death of a of KBC Bank who is also a customer of other KBC entities in Belgium, we also inform those other entities.
- For direct debit mandates, you may take certain steps to block them (e.g., blocking the instruction or imposing a maximum limit). If you take such a step in respect of a direct debit in favour of a KBC company, KBC Bank may inform that company of the fact. The KBC company concerned can then more effectively assess the status of your direct debit instruction.

The individuals who are authorised to consult your data are moreover bound by a strict professional duty of confidentiality and must abide by all technical instructions to ensure the confidentiality of your personal data and the security of the systems in which the data is held.

5.2 Locations where data is processed are limited

KBC Bank uses the services of several processors to process personal data. These are companies that process data on the instructions of KBC Bank.

5.2.1 Processors within the KBC group

For the processing of personal data, KBC Bank makes use of a processor within the KBC group based in the European Union, namely KBC Group NV. Processing is carried out in Brno, for instance, by the Shared Services Centre, a branch of KBC Group NV in the Czech Republic.

Some of the data processing it does on the instructions of KBC Bank NV relates to oversight and support functions (at group level), such as:

- financial reporting;
- the compliance function,
- the internal audit function;
- the inspection and risk function;
- complaints management;
- marketing support;
- support for invoicing, payments, credit processing and sanctions screening;
- the investigation team which develops models and statistics to improve the services and strategy;
- ICT management for the KBC group.

For ICT management, KBC uses KBC Group NV, sometimes in conjunction with other processors within and outside the KBC group. KBC also uses the services of 24+ NV www.24plus.be:

- as a contact centre through which you can get in touch with us;
- as a contact centre to get in touch with you on behalf of KBC for the purpose of making an appointment or conducting a satisfaction survey, to inform you about 'personalised information' and to invite you to make a choice;
- to log data into KBC apps;
- for administrative processing on the instructions of KBC.

Examples include making appointments for branches, answering telephone enquiries, handling e-mails, and processing and executing online apps.

5.2.2 Processors characteristic of the financial sector

KBC Bank uses specialist third parties in Belgium and abroad to perform some processing operations, e.g. payments.

They are:

- SWIFT (www.swift.com) with establishments in Switzerland and the US, for global message exchange;
- Visa (www.visa.com), Mastercard (www.mastercard.com), Atos Worldline (www.atosworldline.com) and, in certain cases, Bancontact Company NV (www.bancontact.com) for payments and (credit) card transactions worldwide;
- custodians and subcustodians of financial instruments worldwide that are subject to local financial regulations;
- institutions for the settlement and clearing of payments and securities transactions, such as the CEC (www.nbb.be) (payment systems) and Euroclear;
- transport companies (for cash and other valuables) and security firms;
- consumer credit intermediaries (i.e. instalment loans).

5.2.3. Other processors

KBC Bank may also directly or indirectly (e.g., through KBC Group NV) engage the services of other processors, such as

- consultants;
- third-party business introducers to fulfil its general duty of vigilance as laid down by law:
 - the obligation to identify and verify identities
 - the obligation to identify the customer characteristics and the purpose and nature of the business relationship
 - the obligation to update information;
- market research agencies such as Ipsos (www.ipsos.co), Profacts (www.profacts.be), GFK (www.gfk.com), Check market (www.checkmarket.com), iVOX (www.ivox.be) and Intrinsiq (www.intrinsiq.be) for issuing invitations and carrying out surveys;
- ICT and ICT-security service providers like Microsoft, Cognizant, IBM, Amazon and HP, and specialist fintech and artificial intelligence companies;
- marketing and communication agencies and similar companies, whereby KBC uses personal profile information on you that is held by them, along with the data it holds on you, to be able to make targeted offers to you via their channels (e.g., Google, Facebook, etc.);
- companies that support KBC in identifying and analysing your user behaviour in our apps and on our websites (e.g., Adobe);
- companies specialising in information archiving and access, such as Doccle (Doccle stores information on all our customers, including those that haven't opted for digital record-keeping);
- companies specialising in solvency investigations;
- printers for printing and addressing news magazines, cheques and transfer forms, among other items;
- freelance translators and translation agencies;
- social media management tools (CX Social);
- companies providing Platform as a Service (PaaS) and Software as a Service (SaaS) in the cloud, such as:
 - the Microsoft Dynamics CRM app used by KBC to maintain customer overviews
 - VEE24's video chat app for enabling digital communication with KBC
 - the storage services of Microsoft Azure or Amazon
 - security services that screen Internet or e-mail traffic with KBC for cyberattacks or phishing scams

5.2.4. Processors outside the EU

When KBC Bank uses the services of processors, data may end up in countries where those processors' data centres are located. In the

case of KBC Bank, this may for example mean that some of your data is processed in countries outside the European Economic Area ('EEA') such as India, Israel or the United States of America. It also means that, because of the commitment to manage incidents around the clock, processors with a data centre located in the EEA use the standard 'follow-the-sun' principle to switch their incident team at night to the United States and then Asia.

The law in countries outside the EEA (like Israel, the United States of America and India) doesn't always afford the same level of data protection as in EEA member states. Where a non-EEA country is viewed by the European Commission as not offering an adequate level of protection, KBC Bank can cover the deficiency by, say, contracting with those processors according to a model approved by the European Commission.

5.3 Processing by other data controllers

As a data controller, KBC may – in addition to using other processors – use other service providers or third parties, such as lawyers or doctors, who themselves are data controllers.

This is, for instance, the case for KBC Securities Services, which is a part of KBC Bank. KBC Securities is the controller of your personal data when providing services in its capacity as a broker or custodian of securities. To this end, KBC Securities Services works with other third parties such as asset managers and private bankers. They in turn offer their own services, such as investment advice, and therefore also act as a controller of your personal data. When that is the case, another – usually shorter – data protection statement may apply since the service is also more limited. If you purchase a service from KBC that is covered by a shortened or non-standard data protection statement, you will be duly advised of this. The most recent version of the statement applying to services provided by KBC Securities Services can be viewed at www.kbc2s.com.

KBC can outsource the collection of arrears on, say, a loan, to specialised companies that themselves are data controllers.

KBC can itself act as a third-party business introducer for, for example, Payconiq, Belgian and Mobile ID (itsme). KBC then processes personal data as data controller. KBC transfers this personal data to the third party. Likewise, a third party may act as a third-party business introducer for KBC.

5.4 KBC Bank processes your data on behalf of third parties

KBC then acts as a processor on behalf of and in accordance with the guidelines of third parties. KBC acts as a processor of your personal data on behalf of third parties further to the execution of orders at a number of stock exchanges or when acting as a broker. This is, for instance, the case for KBC Securities Service.

5.5 Additional services on KBC apps

KBC works with partners such as De Lijn, Sodexo, Olympus and other companies to develop customer-friendly apps in the KBC apps. As a result, KBC apps are developing from a pure banking app into universal service and payment apps. To enable such apps to function properly, KBC exchanges personal data with the partner company, whereby KBC is the data controller in its environment (paying your ticket) and responsible for the transfer of customer data to the third party. The partner company is the data controller in the context of the service to be provided (such as issuing your ticket).

In those cases, it is the third party that is the data controller. To make those services by those third parties available, KBC also acts as processor for that third party as data controller.

You must contact those third parties for more information on the protection of your personal data and to exercise your privacy rights.

5.6 KBC Bank takes specific measures to protect your data

KBC Bank ensures that strict rules are followed and that the processors concerned:

- only have the data they need in order to perform their tasks;
- have given KBC Bank a commitment that they will process this data securely and confidentially and only use it for carrying out the instructions given to them.

KBC Bank will not be liable if these processors (according to law) disclose customers' personal data to local authorities or if incidents occur at those processors despite the measures they have taken.

KBC ensures that the European data protection standards for personal data are applied worldwide within companies belonging to the KBC group and their branches. KBC ensures that companies and corporate branches of the KBC group take appropriate measures to protect the data of legal persons.

KBC Bank takes internal technical and organisational measures to prevent personal data finding its way into the hands of, or being processed by, unauthorised parties or being accidentally altered or deleted.

Strict security measures are in place to protect premises, servers, the network, data transfers and the data itself, and extra checks are also carried out by a specialist department in this regard.

To make online banking and investment services as secure possible, security experts at KBC continuously analyse cyber-criminal activity so that it can hone the relevant security measures accordingly. Read all about it at www.kbc.be/secure4u.

Together with you, we need to be aware that information shared by e-mail can sometimes be intercepted and, where possible, we must aim to use a different means of communication or to limit the amount of information sent.

KBC websites and apps may contain links to websites or information of third parties. KBC Bank does not check such websites or information. Parties offering these websites or this information may have their own privacy policies in place, which we advise you to read. KBC is not responsible for the content of those websites, their use or their privacy policy.

KBC Bank sometimes facilitates the publication of information (including personal data) via social media such as Twitter and Facebook. Bear in mind that these channels have their own terms of use, with which you must comply. Publishing information on social media may have consequences (some of which may be undesirable), including for your privacy or that of persons about whom you share information. You may not be able to delete such published information quickly. You should therefore assess the consequences yourself as the decision to disclose information on such media ultimately lies with you. KBC does not accept any responsibility in that regard.

5.7 KBC does not keep your data for ever

KBC uses your personal data where KBC has a clear aim in mind. Once that aim no longer exists, we delete the data.

The period for which your personal data has to be retained is defined by law (usually till ten years after the end of a contract or execution of a transaction. For commercial claims it is 30 years after the end of a contract or execution of a transaction). The period can be longer where needed for the exercise of our rights. If no retention period is stipulated by law, it can be shorter.

For some applications, a more extended time horizon may be necessary, such as for carrying out surveys and risk and marketing models. Some insights only get clearer once they are viewed over a longer time span. This can result in the retention period being extended by ten years on top of the standard periods. As has been stated, KBC will in all cases sever connections to individuals as quickly as possible and work only with aggregated or anonymised data.

Commercially valuable information that you registered yourself in the KBC Touch application 'Profile yourself' or that was registered at the branch, with the agent or in KBC Live, for example, is retained by KBC for five years.

Personal data on potential customer prospects is used by KBC for a maximum of five years unless, in the meantime, there has been contact with the prospect. In that case, a new maximum five-year period starts. Prospects can always ask for their personal data to be removed.

The retention period that applies to the NC Contact centre application, in which 24+ keeps contact details of potential new customers, is limited to three months.

5.8 KBC thinks before it answers queries from outside parties

5.8.1 Compliance with confidentiality obligations

As KBC Bank has to comply with its confidentiality obligations and with the data protection legislation, it may only answer queries from third parties if they arise pursuant to a legal requirement or a legitimate interest, doing so is a prerequisite for performing the contract or the data subject has given their permission.

In the last case, it actually advises requesting the information directly from the data subject.

KBC Bank declines liability if, as a result of foreign legal obligations, the lawful recipients of personal data require to pass personal data about customers on to local authorities. Or if they process personal data without an adequate level of security.

5.8.2 Requirement for financial ombudsman to address KBC Complaints Management

KBC Complaints management provides answers to the questions posed by Ombudsfm, the ombudsman for banking and insurance.

5.8.3 Third parties must contact the 'Third-Party Enquiries' department.

If you as a third party have queries about customers, for example because you work for the police or are a notary public or lawyer, you can contact KBC's Third-Party Enquiries department, Brusselsesteenweg 100, 3000 Leuven. This specialist department will answer your query subject to bank secrecy obligations and the privacy laws. KBC Bank branches and other departments will therefore refer you to that department.

5.9 You can also help protect your data

There are certain aspects of (technical) data processing over which KBC Bank has no, or at best insufficient, influence and for which it cannot guarantee total security. Examples include the Internet or mobile communications (e.g., smartphones).

If hackers are active, KBC Bank does not always succeed in defeating their cyber-attacks in time. It sometimes does not even know that it is happening, for example if a hacker manages to obtain your identification details by installing illegal software on your computer (spyware) or by creating a fake website (phishing). You will find more information on secure online banking at www.febelfin.be (safe online banking).

KBC Bank therefore suggests that you regularly take a look at the KBC website for information on safe online banking: www.kbc.be/secure4u. This site always contains the most up-to-date tips and recommendations to keep you secure online.

