

# Privacy Statement for Retail Banking customers



of ING Bank N.V.  
(The Netherlands)

You share all sorts of personal data with us. If you use your payment card or view [ing.nl](https://www.ing.nl). If you use our chat function or talk to your relationship manager. In this Privacy Statement you can read what personal data we gather about you and how we process it.

This is the Privacy Statement of ING Bank N.V. Retail Banking the Netherlands (“ING”, “we”, “us” and “our”), and it applies to us as long as we process Personal Data that belongs to individuals (“you”).

### **Retail banking and Wholesale banking**

ING Bank N.V. offers Retail banking services and Wholesale banking services. Retail banking focuses more on the individual and small and medium size businesses. This Privacy Statement applies to customers of Retail banking in the Netherlands.

Wholesale banking services a wide range of companies and organisations, including multinational corporations, financial institutions, governments and supranational institutions. For clients of Wholesale banking services, we refer to the Privacy Statement as published on [ingwb.com](https://www.ingwb.com)

### **Privacy policy of ING**

ING Bank N.V. is a European financial institution and is subject to the EU General Data Protection Regulation 2016/679 (GDPR).

To comply with GDPR, ING Bank N.V. has implemented its Global Data Protection Policy, the GDPP. This policy is approved by the EU Data Protection Authorities. Therefore, in addition to privacy laws and regulations, all parts of ING Bank N.V. have to comply with GDPP.

#### **About this Privacy Statement**

This is the Privacy Statement for Retail Banking customers of ING Bank N.V. (the Netherlands). We may amend this Privacy Statement. This version was created on 9 December 2020. The most recent version is always available at [ing.nl/privacy](https://www.ing.nl/privacy)

# Contents

1. Purpose and scope of this Privacy Statement 4
2. The types of personal data we process 5
3. What we do with your personal data 6
4. Who we share your data with and why 8
5. Your rights and how we respect them 10
6. Your duty to provide data 12
7. How we protect your personal data 13
8. How long we keep your personal data 14
9. Changes to this Privacy Statement 15
10. Contact and questions 16

# 1. Purpose and scope of this Privacy Statement

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

This Privacy Statement applies to:

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

## **How do we obtain your personal data?**

We obtain your personal data in the following ways:

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

## 2. The types of personal data we process

**Personal data** refers to any information that identifies or can be linked to a natural person. Personal data we process about you includes:

- **Identification data:** the name, date and place of birth, ID number, email address, telephone number, title, nationality and a specimen signature, fiscal code/social security number (such as Burgerservicenummer);
- **Transaction data,** such as your bank account number, any deposits, withdrawals and transfers made to or from your account, and when and where these took place;
- **Financial data,** such as invoices, credit notes, payslips, payment behaviour, the value of your property or other assets, your credit history, credit capacity, financial products you have with ING, whether you are registered with a credit register, payment arrears and information on your income;
- **Socio-demographic data,** such as whether you are married and have children. Where law considers this sensitive data, we respect the law;
- **Information about devices, operating system, online behaviour and preferences data,** such as the IP address of your mobile device or computer, the type, version and brand of device used to visit ing.nl or apps, the operating system and browser version you use, your cookie settings, your mobile advertising ID and the pages you visit on ING websites and apps.
- **Data about your interests and needs** that you share with us, for example when you contact our call centre or fill in an online survey;
- **Know our customer data as part of customer due diligence** and to prevent fraudulent conduct or behaviour that contravenes international sanctions and to comply with regulations against money laundering, terrorism financing and tax fraud;
- **Audio-visual data;** where applicable and legally permissible, we process surveillance videos at ING branches, or recordings of phone or video calls or chats with our offices. We can use these recordings, to verify telephone orders, for example, or for fraud prevention or staff training purposes;
- **Your interactions with ING on social media,** such as Facebook, Twitter, Instagram, Google+ and YouTube. We follow public messages, posts, likes and responses to and about ING on the internet.

### Sensitive data

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

- We have your explicit consent;
- We are required or allowed to do so by applicable law. For example, we may be obliged to keep a copy of your passport or identity card when you become an ING customer;
- You instruct us to make a payment, for example, to a political party or religious institution.

- If allowed under law, and you choose to use it, we may use face, fingerprint or voice as recognition for authentication to access mobile apps and perform certain operations therein.

### Children's data

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

## 3. What we do with your personal data

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

We only use your personal data for business purposes as:

### Performing agreements to which you are a party or taking steps prior to entering into agreements

We use information about you, such as your name and contact details, when you enter into an agreement with us, or we have to contact you. We analyse information about you to assess whether you are eligible for certain products and services. For example, we may look at your payment behaviour and credit history when you apply for a loan or a mortgage. And we use your account details when you ask us to make a payment or carry out an investment order.

### Relationship management and marketing

We may ask you for feedback about our products and services, or record your conversations with us online, by telephone or in our branches. We may share this with certain members of our staff to improve our offering or to customise products and services for you. We may send you newsletters informing you about these products and services. Of course, if you don't want to receive these offers you have the right to object or to withdraw your consent.

#### • Providing you with the best-suited products, services and marketing

We may use your data for commercial activities, including processing which is necessary for developing and improving our products and/or services, customer service, segmentation of customers and profiling and the performance of (targeted) marketing activities. We do this to establish a relationship with you and/or to maintain and extend a relationship with you and for performing statistical and scientific purposes. You have the right to withdraw your consent or object to personalised direct marketing or commercial activities, including related profiling activities. Moreover, you can always unsubscribe from receiving personalised offers. We may also use your transaction data (withdrawals and transfers) to show you the most relevant tips and offers for ING products and services and to give you more insight into your banking affairs. ING will only use your transaction data for these purposes with your consent. And of course you can always withdraw your consent if you no longer wish to receive these tips and offers. Does one of the joint account holders provide consent for the use of transaction data? Then we will inform the other account holder(s).

#### • To improve and develop our products and services

Analysing how you use and interact with our products and services helps us understand more about you and shows us where and how we can improve. For instance:

- When you open an account, we measure how long it takes until you are able to use your account.
- We analyse the results of our marketing activities to measure their effectiveness and the relevance of our campaigns.
- Sometimes we analyse your personal data using automated processes, such as algorithms, to speed up credit decisions for loans and mortgages.

#### • For credit risk and behaviour analysis

We use and analyse data about your credit history and payment behaviour to assess your ability to repay a loan, for example.

### Business process execution, internal management and management reporting

We process your data for our banking operations and to help our management make better decisions about our operations and services.

### Safety and security

We have a duty to protect your personal data and to prevent, detect and contain any breaches of your data. This includes data we are obliged to collect about you, for example to verify your identity when you become a customer. Furthermore, we not only want to protect you against fraud and cybercrime, we have also a duty to ensure the security and integrity of ING and the financial system as a whole by combatting crimes like money laundering, terrorism financing and tax fraud.

- To protect your assets from fraudulent activities online, for example, if you are hacked and your username and password are compromised.
- We may use certain information about you (e.g. name, account number, age, nationality, IP address, etc.) for profiling purposes to detect fraudulent activities and the perpetrators. Our security department may share your personal data with the security department of other financial institutions in the context of fraud investigations. More information is available in the Protocol Incident Register for Financial Institutions (PIFI) at [nvb.nl](http://nvb.nl)
- We may register you in our internal ING reference register. This is a list of people and institutions with whom we no longer wish to have a relationship since they pose a risk either to ING, ING's employees and/or ING's customers.
- We may use your personal data to alert you if we detect suspicious activity on your account, for example when your debit or credit card is used in a non-typical location.

### **Protecting your vital interests**

We process your data when necessary to protect your interests which are essential for your life or that of another natural person. For example for urgent medical reasons. We will only process your data necessary for the vital interests of another natural person if we cannot base it on one of the other purposes mentioned.

### **Compliance with legal obligations to which we are subject**

We process your data to comply with a range of legal obligations and statutory requirements.

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

## 4. Who we share your data with and why

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

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

- Requirements based on applicable local laws and regulations.
- EU Model clauses, when applicable, we use standardised contractual clauses in agreements with service providers to ensure personal data transferred outside of the European Economic Area complies with GDPR.

### ING entities

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

### Government, Supervisory and Judicial authorities

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

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

### Financial institutions

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

- Exchanging secure financial transaction messages;
- Payments and credit transactions worldwide;
- Processing electronic transactions worldwide;
- Settling domestic and cross-border security transactions and payment transactions; or
- Other financial services organisations, including banks, superannuation funds, stockbrokers, custodians, fund managers, portfolio service providers, the Credit Registration Office (BKR), the National Mortgage Guarantee (NHG) and the company that arranges the IBAN Name Check.

### Service providers and other third parties

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

- Designing, developing and maintaining internet-based tools and applications;
- IT service providers who may provide application or infrastructure (such as cloud) services;
- Marketing activities or events and managing customer communications;
- Preparing reports and statistics, printing materials and designing products;
- Placing advertisements on apps, websites and social media;
- Legal, auditing or other special services provided by lawyers, notaries, trustees, company auditors or other professional advisors;
- Identifying, investigating or preventing fraud or other misconduct by specialised companies. And to prevent criminals from cheating with SMS codes, telecom companies inform us if a SIM change has taken place on a certain mobile number;
- Performing specialised services like postal mail by our agents, archiving of physical records, contractors and external service providers; or
- Carrying out securitisation arrangements (such as trustees, investors and the advisers).

### **Account information and payment initiation services within the EU**

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

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

### **Independent agents, brokers and business partners**

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

We broker non-life insurance for Nationale-Nederlanden NV (NN), for instance. This includes homeowners insurance. ING is your first point of contact. NN will separately conclude an insurance contract with you and therefore needs your personal data to collect the premium and to pay possible benefits. If you want to know how Nationale-Nederlanden looks after your data, have a look at their Privacy Statement at [nn.nl](https://www.nn.nl)

### **Researchers**

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

## 5. Your rights and how we respect them

**If your personal data is processed, you have privacy rights. When exercising your right, the more specific you are with your application, the better we can assist you with your question. We may ask you for a safe copy of your ID, or additional information to verify your identity. We do this to ensure that someone else does not exercise your rights.**

We want to address your request as quickly as possible. In some instances this could take up to one month (if legally allowed). Should we require more time (than what is normally permitted by law) to complete your request, we will notify you immediately and provide reasons for the delay.

In some cases we may deny your request and, if permitted by law, we will notify you of the reason for denial. If permitted by law, we may charge a reasonable fee for processing your request.

We grant the following rights:

### **Right to access information: an overview of your personal data**

You have the right to ask us for an overview of your personal data that we process. That is called the 'Right to access'. The purpose of this right is that you can check whether your data is accurate and complete. Then you can adjust the data if necessary.

You can see many of these data when you log in on my ING (online banking) or the ING app, like: name, date of birth, residential- and correspondence address, email address, phone number, transactions, communication- and privacy settings, mobile devices and authorizations.

Do you have questions about personal data that is not shown in My ING (online banking) or the ING app? Or do you not use My ING? Then you can send us an application form. Are you looking for particular personal data, please indicate this on the application form.

Enclose a safe copy of your valid passport, driving licence or other proof of identity with the application form. You can send the form by email to [privacyloket@ing.com](mailto:privacyloket@ing.com) or by post (no postage required) to:

ING Bank N.V.  
Attn. Privacyloket NL  
Antwoordnummer 40060  
8900 SB Leeuwarden

### **Right to rectification: correct your personal data**

If your personal data is incorrect or incomplete, you have the right to ask us to rectify it. You can amend your data in My ING

(online banking), via Customer Service, at the ING branch or ING service point.

If we shared data about you with a third party and that data is later corrected, we will also notify that party accordingly.

### **Right to object to processing because of personal circumstances**

You can object to ING using your personal data for its own legitimate interests if you have a justifiable reason.

You can send an e-mail with your name and your account number to [privacyloket@ing.com](mailto:privacyloket@ing.com). Please give a short explanation why you want to make use of this right.

We will consider your objection and whether processing your information has any un-due impact on you that would require us to stop processing your personal data.

You may not object to us processing your personal data if

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

### **Right to object to personal offers**

We like to keep you abreast of our products and services. If necessary we will ask your consent. You can always withdraw your consent.

You can take care of many things through My ING:

- Indicate whether you want to receive newsletters and special offers by email;
- Or whether we may contact you by phone to tell you about a special offer or interesting product or service;
- What cookies you allow.

And of course, every newsletter and email has a link at the bottom allowing you to unsubscribe.

If you do not have a My ING account or would prefer that it be arranged for you, you can visit an office or ING service point or call our Customer Service.

You also have the right to object to direct marketing. Do you want to use your right to object and stop the use of your personal data to make personal offers? And prevent your data from being used for direct marketing profiles?

- Choose the right privacy setting at the privacy page in My ING or
- Send us an email with your account number and your name. The address is: [Recht.van.bezwaar@ing.nl](mailto:Recht.van.bezwaar@ing.nl) or
- Send a request with your name and account number (no postage required) to:  
ING Bank N.V.  
Attn. Privacyloket NL  
Antwoordnummer 40060  
8900 SB Leeuwarden

**Please note:**

The right to object is a personal right. In the case of a joint account, each account holder must therefore adjust his or her own privacy setting.

If you object or do not consent, you will still see advertisements from us inside and outside ING not based on your personal data.

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

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

**Right to object to automated decisions**

We sometimes use systems to make automated decisions based on your personal information if this is necessary to fulfil a contract with you, or if you gave us consent to do so. You have the right to object to such automated decisions (for example the price we charge for a product or service) and ask for an actual person to make the decision instead.

**Right to restrict processing**

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

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

With an application form at [ing.nl/privacy](https://ing.nl/privacy) you can ask us to restrict the processing of your data. Enclose a safe copy of your valid passport, driving license or other proof of identity with the application form. You can send the form by email to [privacyloket@ing.com](mailto:privacyloket@ing.com) or by post (no postage required) to: ING Bank N.V.

Attn. Privacyloket NL  
Antwoordnummer 40060  
8900 SB Leeuwarden

**Right to data portability: transfer your personal data**

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

With an application form at [ing.nl/privacy](https://ing.nl/privacy) you can ask us to transfer certain data to you. You can control the data and transfer the data to a third party yourself. Enclose a safe copy of your valid passport, driving license or other proof of identity with the form. You can send the form by email to [privacyloket@ing.com](mailto:privacyloket@ing.com) or by post (no postage required) to: ING Bank N.V.

Attn. Privacyloket NL  
Antwoordnummer 40060  
8900 SB Leeuwarden

Do you only want to check your personal data? Please use your right to access.

**Right to erasure or 'right to be forgotten': delete your personal data**

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

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

With an application form at [ing.nl/privacy](https://ing.nl/privacy) you can ask us to delete certain data. Enclose a safe copy of your valid passport, driving license or other proof of identity with the form. You can send the form by email to [privacyloket@ing.com](mailto:privacyloket@ing.com) or by post (no postage required) to: ING Bank N.V.

Attn. Privacyloket NL  
Antwoordnummer 40060  
8900 SB Leeuwarden

**Right to complain**

Should you as a customer or its representative be unsatisfied with the way we have responded to your concerns, you have the right to submit a complaint to us. You can use our complaints procedure for this. Please take a look at [ing.nl/klachten](https://ing.nl/klachten)

If you are still unhappy with our reaction to your complaint, you can escalate it to the ING Bank data protection officer. Please send an email to [dpo.office@ing.nl](mailto:dpo.office@ing.nl)

Or you can send us a letter (no postage required): ING Bank N.V.

Attn. Privacyloket NL  
Antwoordnummer 40060  
8900 SB Leeuwarden

You can also lodge a complaint to the data protection authority via [autoriteitpersoonsgegevens.nl](https://autoriteitpersoonsgegevens.nl)

## 6. Your duty to provide data

**In some cases, we are legally required to collect personal data or your personal data may be needed before we may perform certain services and provide certain products.**

We undertake to request only the personal data that is strictly necessary for the relevant purpose. Failure to provide the necessary personal data may cause delays in the availability of certain products and services.

## 7. How we protect your personal data

**We take appropriate technical and organisational measures (policies and procedures, IT security etc.) to ensure the confidentiality and integrity of your personal data and the way it's processed.**

We apply an internal framework of policies and minimum standards across all our business to keep your personal data safe. These policies and standards are periodically updated to keep them up to date with regulations and market developments.

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

## 8. How long we keep your personal data

**Applicable laws require us to retain personal data for a period of time. This retention period may vary from a few months to several years, depending on the applicable law.**

When your personal data is no longer necessary for a process or activity for which it was originally collected, we delete it, or bundle data at a certain abstraction level (aggregate), render it anonymous and dispose of it in accordance with the applicable laws and regulations.

At [ing.nl/privacy](https://ing.nl/privacy) you will find some examples of retention periods.

## 9. Changes to this Privacy Statement

This is the Privacy Statement for Retail Banking customers of ING Bank N.V. (the Netherlands). We may amend this Privacy Statement to remain compliant with any changes in law and/or to reflect how our business processes personal data. This version was created on 9 December, 2020. The most recent version is always available on [ing.nl/privacy](https://ing.nl/privacy)

## 10. Contact and questions

To learn more about ING's data privacy policies and how we use your personal data, you can send an email to our Privacy Office: [privacyloket@ing.com](mailto:privacyloket@ing.com)

You can also send a letter (without stamp) to:

ING Bank N.V.  
Attn. Privacyloket NL  
Antwoordnummer 40060  
8900 SB Leeuwarden

If you want to contact our data protection officer, you can send an email to [dpo.office@ing.nl](mailto:dpo.office@ing.nl)

**Want to know more?**

 **Visit [ing.nl](https://ing.nl)**

 **Or call +31 (0)20 22 888 88**

