

ING Public Key Infrastructure Privacy Statement

Version 5.4 - November 2015

1. Warranties

ING Bank N.V. (hereinafter referred to as 'ING') will make its best efforts that the processing of your personal data is carried out in such a way that your privacy is protected and safeguarded as much as possible. ING only collects your personal data to the extent that they are necessary to provide you with our services and to comply with mandatory requirements. For the sake of clarity it is reminded that privacy regulations only pertain to natural persons including partners of non legal persons, but they do not apply to legal persons (corporations) and those acting on their behalf in relation to ING.

2. About ING

ING forms part of ING Group. The Data Protection Act permits to designate a special company to act as the Controller of all or several group companies. The controller of ING is ING Cliëntenadministratie Nederland B.V. (hereinafter referred to as 'ICN'), P.O. Box 810, 1000 AV Amsterdam. Client data of these group companies, including ING, are stored in a central database controlled by ICN and may be exchanged between the group companies concerned, with due observance of the principles of the Code (see §3).

3. Code of Conduct

ICN is subject to the Code of Conduct for the Processing of Personal Data by Financial Institutions (hereafter to be referred to as 'the Code'). The Code was drawn up jointly by the Association of Insurers in The Netherlands (Verbond van Verzekeraars – 'VvV') and The Netherlands Bankers' Association (Nederlandse Vereniging van Banken – 'NVB') and has been approved by the Dutch data protection authority.

You can find the Code by visiting www.nvb.nl, choose "Publicaties", look under "Gedragscodes".

4. Purposes

Your personal data is processed for the purposes stated in paragraph 5 of the Code. In brief these purposes are:

- assessing and accepting you as (potential) customer
- conclusion and performance of contracts
- marketing activities
- combating and preventing fraudulent acts
- fulfilment of legal obligations, and
- analyses for statistical purposes.

It should be noted that ING may also process your personal data for statistical or scientific purposes with the objective to enhance the quality of our products and services. This kind of processing will be carried out on an anonymous basis and not identifiable to a data subject.

This Privacy Statement may be modified from time to time to comply with applicable laws or to reflect our updated business practises, without prior notice. Please check the ING Corporate PKI website www.ing.com/pki from time to time for any changes.

Note: In case of law enforcement issues, personal data can be made available to the proper authorities.

5. Security

Your personal data will be stored in your personal file. The confidentiality of these data will be protected by a user name and a password.

6. Customer Rights

6.1. Right of access and rectification

Customers have the right to file a request with us in writing in order to obtain information on his or her personal data which are processed by us by automatic means. A first request of information will be complied with free of charge. For possible further requests we may charge applicable fees as permitted by law. Should the information supplied by us contain inaccuracies, then you may request us in writing to proceed to a rectification or erasure, as the case may be. Such request should be addressed to the management of ING. You will be informed in writing within four weeks whether or to which extent your request will be complied with.

6.2. Right to object

If you do not care to be informed regularly of our products and services you may notify ING accordingly by sending an e-mail to privacy@mail.ing.nl.