Privacy statement
for applicants
to
ING Bank N.V. Amsterdam, Lancy/Geneva branch

(V1.1)

Contents

ING Bank N.V. Amsterdam, Lancy/Geneva branch is a Swiss branch of ING Bank N.V. and is subject to the Swiss data protection laws and regulations. ING Bank N.V. is a European financial institution and is subject to the data protection obligations set out in the EU General Data Protection Regulation 2016/679 (GDPR). To comply with GDPR, ING Bank N.V. has implemented data protection principles on a global scale, through its Global Data Protection Policy (GDPP). The GDPP is binding on all ING entities, subsidiaries, branches, representative offices, and affiliates worldwide and approved by the EU data protection authorities. Therefore, in addition to local privacy laws and regulations, we have resolved that all its entities, subsidiaries, branches, representative offices, and affiliates worldwide will comply with GDPP, regardless of geographical location of job applicants.

This is the privacy statement for applicants to ING Bank N.V., Amsterdam, Lancy/Geneva branch (hereinafter referred to as “ING”, ”we”, ”us” and ”our”), and it applies to us as long as we process personal data that belongs to individuals (‘you’).

1. Purpose and scope of this privacy statement

At ING, we understand that your personal data is important to 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 job applicants (‘you’)

This privacy statement does not apply to:

- independent contractors or anyone else hired to work at ING on anything other than on the basis of an employment contract. Please refer to the ‘Privacy statement for ING supplier personnel’ that can be found on https://www.ing.com/Privacy-Statement.htm

We obtain your personal data in the following ways:

- You share it with us when you apply for a job or visit our websites.
- From the person who recommended your job application.
- From other available sources such as professional registers; publicly available sources (such as Thompson Reuters, World Check or judicial platforms); other ING companies; or third parties such as public authorities.

2. The types of personal data we process

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

- **Identification data**, such as your name, surname, date and place of birth, ID number, passport number, other data in your ID document, driving licence, passport or other document confirming your identity, social security number, home address or place of residence, phone number and email address.
- **Personal information,** such as nationality; gender; work permits; photographs; professional experience (profile, previous employers, termination of last employments and work carried out, special projects, outside positions); education, professional qualifications and continuous training (diplomas, certificates, internships);
- **Interests and needs**, for example hobbies and memberships you share with us.
- **Audio-visual data,** where it’s applicable and legally allowed, we process

surveillance videos of ING offices and car parks.

Sensitive data

Sensitive data is information relating to your health, ethnicity, religious or political beliefs, genetic or biometric data, or criminal records.
We may process your sensitive data if

- it is legally required and allowed to do so under local law.

3. What we do with your personal data

Processing refers to 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 the following business purposes:

Recruitment
Personal information (applicant data) submitted by an applicant to INGG will only be used by INGG to support a responsible, effective and efficient recruitment and selection process. INGG will process applicant data for recruitment purposes only. INGG recruitment purposes are: matching applicant data with INGG current open positions, communicating INGG recruitment and selection procedures, contacting applicants to schedule interviews/tests and sending information to applicants about other relevant vacancies, pre-employment requirements in line with INGG procedures, contact the candidates which have signed their contracts in order to optimize their integration in the company as well as to deliver them all the necessary information with regard to their statute. Processing includes: obtaining, recording, holding, organizing, transferring, consulting, using, or otherwise making available, destroying and erasing recruitment data.

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

Retention of your personal data
ING will retain applicant's data during the recruitment and selection process and for up to one year. ING will only retain applicant's data after the recruitment and selection process if there is a legal obligation to do so. ING may also retain applicant's data, but with the express consent of the applicant, in the case there is a 'business need' to keep the applicant data, e.g. keeping an applicant's resume on file if a suitable vacancy arises.

4. Who we share your data with and why

We share certain data internally (with other ING businesses/departments) and externally (with other ING entities or third parties outside of ING) if required on a case by case basis.

Safeguards

Whenever we share personal data externally (i.e., outside of ING), we ensure there are safeguards in place to protect it. For this purpose, we rely on (among) others:

- Applicable local laws and regulations;
- Model Clauses, when applicable. We use preapproved standardized contractual clauses in agreements with service providers to ensure personal data transferred outside of Switzerland complies with Swiss law;
- Adequacy decisions of the Swiss authorities, which establish whether a country outside of Switzerland ensures personal data is adequately protected; or
- your consent.

ING entities

We transfer data across ING businesses and branches for various purposes (see section 'What we do with your personal data'). We may also transfer data to centralised storage systems or for processing centrally within ING for efficiency purposes. For all internal data transfers, we rely on our GDPP and on the applicable local laws and regulations.

Authorised ING employees

Certain employees are authorised to process your personal data for legitimate purposes (see section 3 'What we do with your personal data'). They are only authorised to do so to the extent that is needed for that purpose and to perform their job. All employees are subject to confidentiality obligations, also according to local requirements.

Service providers and other third parties

When it is required for a particular task, we may share your personal data with external service providers or other third parties who carry out certain activities for ING in the normal course of our business.
Service providers support us with activities like:

- performing certain services and operations
- designing, developing and maintaining internet-based tools and applications
- IT services such as applications or infrastructure e.g. cloud services
- preparing reports and statistics, printing materials and product design
- recruitment

To date, the most noticeable fields of services that will be (or, as the case may be, are)

externalised are:

(a) mailbox, sharepoint, personal file storage and mobile device management services that will be performed by Microsoft Office 365 (mailbox in the cloud (Exchange online), SharePoint in the cloud (SharePoint Online), personal file storage in the cloud (OneDrive), Mobile Device Management including mail access (Intune) and a video platform)) and, accessorily, by their affiliates and / or associated companies;

(b) recruitment process that will be managed by Workday (Strategic HR Talent Management and Software | Workday).

This entails that your data (that may include, to the necessary extent, sensitive data) have to be and will be transferred to/ accessible abroad, in or from EU countries, the USA and Asia (*inter alia* Philippines and India). Such transfers and accesses will comply with (at least) the safeguards detailed above under section 4.

In all of these cases, we ensure the third parties can only access personal data that is necessary for their specific tasks.

5. Your rights and how we respect them

We respect your rights as an applicant to determine how your personal information is used. These rights include:

Right to access information

You have the right to ask us for an overview of your personal data that we process and/or a copy of this data.

Right to rectification

If your personal data is incorrect, you have the right to ask us to rectify it. If we have shared data about you with a third party, we will also notify that party of any corrections made.

Right to object to processing

You can object to us using your personal data. We will consider your objection and assess whether there is any undue 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 for fulfilling a contract with you.

Right to restrict processing

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

- you believe the information is inaccurate
- we are processing the data unlawfully
- ING no longer needs 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.

Right to erasure

We are legally obliged to keep certain personal data for a specified period of time. You may ask us to erase your online personal data and the right to be forgotten is applicable if:

- we no longer need your personal data for its original purpose and we are not under any obligation to retain it;
- if your personal data is processed with your consent, you withdraw your consent for the processing of it;
- you object to us processing your personal data for our own legitimate interests and your claim has been found legitimate
- we unlawfully process your personal data
- a local law requires ING to erase your personal data.

Right to complain

Should you not be satisfied with the way we have responded to your concerns, you have the right to submit a complaint to us. If you are unhappy with our reaction to your complaint, you can escalate it to ING's local data protection officer. You can also contact the Swiss Federal Data Protection and Information Commissioner which is the data protection authority in Switzerland.
(https://www.edoeb.admin.ch/edoeb/en/home.html).

Exercising your rights

If you want to exercise your rights or submit a complaint, please contact us via the contact details under chapter 9.

If the requirements for your request (as set out in the GDPP for employees) are not fulfilled, your request may be denied. If permitted by law, we will notify you of the reason for denial.

We aim to respond to your request in one month of ING receiving the request.
. Should we require more time to complete your request, we will let you know how much longer we need and provide reasons for the delay.

6. Your duty to provide data

As your potential employer, there is certain personal information we are legally required to collect, or that we need to execute our duties and fulfil our contractual obligations. There is also information that we need for certain HR processes. We aim to only ask you for personal data that is strictly necessary for the relevant purpose. Not providing this information may mean we cannot hire you.

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 remain current 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 your personal data may have been compromised.

8. Changes to this privacy statement

We may amend this privacy statement to remain compliant with any changes in law and/or to reflect how we process personal data. Last review of the document took place in November 2023.

9. Contact and questions

NG Bank N.V. Amsterdam, Lancy/Geneva branch is the controller and processor of your personal data. To find out more about our data privacy policy and how we use your personal data, please see the privacy tab on your profile on One Intranet. You can also find our contact information below:

Country	Contact details ING	Data protection authority
Switzerland	ING Bank N.V., Amsterdam, succursale de Lancy/Genève Avenue des Morgines 10	Préposé fédéral à la protection des données et à la transparence |

Country	Contact details ING	Data protection authority
	CH -1213 Petit-Lancy/Genève Data protection officer: bp.dp@ing.ch Human resources: HR.People.services@ing.ch	Federal Data Protection and Information Commissioner https://www.edoeb.admin.ch/edoeb/en/home.html