

**Privacy Statement**  
**for**  
**ING Former retail clients**

Czech Republic – June 2025

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ING Bank N.V. is an European financial institution and is subject to the data protection obligations set out in the REGULATION (EU) 2016/ 679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL - of 27 April 2016 - on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/ 46/ EC (General Data Protection Regulation) (europa.eu)

This is the Privacy Statement of ING Bank N.V., a public limited company incorporated under the laws of The Netherlands, with its registered seat at Bijlmerdreef 106, 1102 CT Amsterdam, The Netherlands, registered in the Trade Register of the Chamber of Commerce for Amsterdam under no. 33031431, represented in the Czech Republic by **ING Bank N.V., Prague branch, with its company seat at Českomoravská 2420/15, Libeň, 190 00 Prague 9, Czech Republic, Business Identification No.: 492 79 866**, registered in the Commercial Register maintained by the Municipal Court in Praha under the inserted file No. A 7930 ('ING CZ', '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 CZ, 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. When handling your data, we seek to ensure that the right people are using the right data for the right purpose.

This Privacy Statement explains how we handle your personal data, your rights under the General Data Protection Regulation (GDPR), and how you can contact us if you have any concerns.

This Privacy Statement applies to:

- All ING CZ former retail clients ("**you**") who's data is still processed for archiving purposes.

We refer to our cookie statement as published on the ING website for more information about the use of cookies and comparable technologies.

## 2. The types of personal data we process

We may continue to store and process personal data that was collected while providing retail banking services, including but not limited to:

**Personal data** refers to any information that identifies or can be linked to a natural person:

- **Identification data and contact data:** your name, date and place of birth, ID number and National Identification Number, TIN, as well as other information included in the ID (such as citizenship or date of issue or expiration), email address, address, telephone number, title, nationality and a specimen signature or identifier in systems of ING.
- **Transaction data,** such as your bank account number, any deposits, withdrawals and transfers made to or from your bank account, and when and where these took place, transaction identifiers and associated information.
- **Audio-visual data:** where applicable and legally permissible, we process surveillance videos at ING premises, 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.

If you transmit personal data of third parties (e.g. a partner, beneficiary, collaborators, etc.) to us in connection with the processing of their personal data, it is your responsibility to inform them of the commencement of the processing of their personal data by ING and to inform them of this processing policy.

### 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 retain your data solely for archiving purposes, including:

- **Compliance with our legal obligations.** We use your personal data to comply with a range of legal obligations and statutory requirements, including banking and financial regulations;
- Responding to regulatory or legal inquiries;
- Handling potential disputes or claims.

We do not use your personal data for marketing or any new processing activities.

**Our legitimate interest.** We process your data for a range of purposes that are in our interests as described below.

When relying on legitimate interest, we ensure that processing remains proportionate and that your interests, fundamental rights and freedoms are respected. If you would like more information about our reasoning behind our assessment in a specific case, please contact us using the details provided in Contact and questions.

Please find below an overview of the purposes for which we process your personal data where we rely on legitimate interest:

- **Legal Obligation:** We must retain certain records to comply with applicable laws and regulations including but not limited to Act No. 253/2008 Coll, on AML as amended.
- **Legitimate Interests:** Where necessary, we retain data to respond to potential legal claims or regulatory requests.

#### 4. Who we have your personal data with and why

There are situations in which we need to provide your personal data to other parties involved in the provision of our services. This could include data transfers within ING Group, to your employer (our WB customer) and to third parties.

##### Within ING

Wholesale Banking is part of ING Group which provides financial services in over 40 countries. For more information about ING Group, please visit <https://www.ing.com/About-us/Profile/ING-at-a-glance.htm>

ING is committed to your privacy and it has adopted strong privacy principles through its Global Data Protection Policy ('GDPP'). The GDPP is approved by the Dutch Data Protection Authority, which is the lead supervisory authority for ING Bank N.V., and is binding on all ING entities, subsidiaries, branches, representative offices, and affiliates worldwide (also known as 'Binding Corporate Rules').

If applicable, we may share your personal data within ING to ensure that we're able to comply with our legal obligations such as:

- To comply with any regulatory and statutory reporting obligations and data requests as required by ING Group's European regulators, including the European Banking Authority (EBA), European Central Bank (ECB) and the Financial Stability Board (FSB). Unless data on an individual level is specifically requested by a regulator, we will always make sure that personal data is aggregated, meaning that only information

about groups of customers will be shared with the Group's regulators to ensure that it can no longer be linked back to you.

- We may use centralised storage systems to process data at a central point within ING for efficiency purposes. These centralised storage systems are operated by ING or third parties such as Microsoft and might be located outside the EU. In any case, ING will always ensure that adequate measures are in place to safeguard your personal data.

Please note that ING will remain responsible for ensuring that the processing of your personal data - including any processing carried out by other ING entities on our behalf as set out above - complies with the applicable data protection regulations. Within ING there are strict requirements included in internal policies and contractual arrangements in place to ensure that your personal data will only be processed for a specific purpose on the basis of an appropriate legal basis if so required by local law (taking into account any effect such processing may have on you) and that adequate organisational and technical measures have been implemented to protect your rights. We will also remain responsible for handling any request you may have in relation to your personal data protection rights as described below.

### **With third parties**

We also share your personal data with the following third parties:

#### **Government, supervisory and judicial authorities**

To comply with our regulatory obligations, we're obliged by law to disclose certain personal data to the relevant government, supervisory and judicial authorities, including:

- **Public authorities, regulators and supervisory bodies** such as the European Central Bank (ECB) and De Nederlandsche Bank (the Dutch central bank, DNB) in the Netherlands or another national central bank. We also obtain personal data it from the relevant registers established in accordance with applicable law, e.g. the commercial and trade register.
- **Local tax authorities** 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 such as tax identification number or any other national identifier in accordance with applicable local law.
- **Judicial/investigative authorities** such as the police, public prosecutors, courts and arbitration/mediation bodies at their express and legal request or insolvency administrators and executors.

### Other financial institutions

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

- Payments and credit card transactions worldwide, including Mastercard and VISA where applicable.
- Processing electronic transactions worldwide.
- Settling domestic and cross-border security transactions and payment transactions.
- the financial services organisations, including banks, superannuation funds, stockbrokers, custodians, fund managers and portfolio service providers.

In the case of transfers of personal data to third countries (outside the European Economic Area), we always use instruments to ensure sufficient protection of the rights of the data subjects based on appropriate safeguards.

### 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. We carefully select these companies and enter into clear agreements with them on how they are to handle your personal data. We remain responsible for your personal data. These service providers support us with activities such as:

- Legal, auditing or other special services provided by lawyers, notaries, trustees, company auditors or other professional advisers.
- Identifying, investigating or preventing fraud or other misconduct by specialised companies.
- Performing specialised services such as postal mail by our agents, archiving of physical records, contractors and external service providers.
- Carrying out securitisation arrangements (such as trustees, investors and the advisers).

### Researchers

We are always looking for new insights to empower you to stay a step ahead in life and in business. For this reason, we exchange personal data (when it is legally allowed) with partners such as 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. When possible, the personal data will be shared at an aggregated level to ensure the results of the research are anonymous.

## 5. Your rights and how we respect them

If your personal data is processed, you have rights. Based on applicable laws, your personal data protection rights may vary from jurisdiction to jurisdiction. If you have questions about which rights apply to you, please get in touch with us using the email address mentioned in **section 7 (How we protect your personal data)**.

You have the following rights:

### Right of access

You have the right to ask us for an overview of your personal data that we process.

### Right to rectification

If your personal data is incorrect, you have the right to ask us to rectify it. If we share 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

You can object to ING using your personal data for its own legitimate interests if you have a justifiable reason. We will consider your objection and whether processing your personal data has 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 to fulfil 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 personal data is inaccurate;
- we are processing the personal data unlawfully;
- we no longer need the personal data, but you want us to keep it for use in a legal claim;
- you have objected to us processing your personal data for our own legitimate interests.



### Right to data portability

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

### Right to erasure ('right to be forgotten')

ING is sometimes legally obliged to keep your personal data. However, if you exercise your right to be forgotten, we will erase your personal data when:

- we no longer need it for its original purpose;
- 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 local law requires ING to erase your personal data.

### Right to complain

Should you as a customer or as a customer's representative be unsatisfied with the way we have responded to your concerns, you have the right to submit a complaint to us. If you are still unhappy with our reaction to your complaint, you can escalate it to the ING Bank data protection officer. You can also lodge a complaint with the data protection authority located in the country where your personal data is processed by us.

### Right to withdraw consent

If you have given your consent to us for specific processing of your personal data as set out in **section 3 (What we do with your personal data)**, you can withdraw your consent at any time. From that moment, we are no longer allowed to process your personal data. Please be aware that such withdrawal will not affect the lawfulness of processing based on consent before its withdrawal.

### Exercising your rights

To exercise any of the rights as set out above, please send your request to your ING branch location where you hold your bank account. The processing of applications is free of charge, unless otherwise provided by law.

When exercising your right, the more specific you are with your request, the better we can assist you. We may ask you for additional information to verify your identity. In some cases, we may deny your request and, if permitted by law, we will notify you of

the reason for denial of your request. If permitted by law, we may charge a reasonable fee for processing your request.

We want to address your request as quickly as possible. However, based on your location and applicable laws, the response times may vary. Should we require more time (than normally permitted by law) to complete your request, we will notify you immediately and provide reasons for the delay.

## 6. Retention

We do not store your personal data longer than we need to for the purposes (as set out in **section 3 (What we do with your personal data)**, for which we have processed it. Sometimes we use different storage periods. For example, if the supervisory authority requires us to store certain personal data longer or if you have filed a complaint that makes it necessary to keep the underlying personal data for a longer period. If we no longer need your personal data as described above, we delete or anonymise the personal data, in accordance with regulatory provisions and applicable law. We store your personal data in accordance with several legal acts, for instance [...]

## 7. How we protect your personal data

We take appropriate technical and organisational measures to ensure the availability, confidentiality and integrity of your personal data and the way it is processed. This includes state-of-the-art IT security, system and access controls, security monitoring, segregation of duties. We apply an internal framework of policies and minimum standards across all our businesses to keep your personal data safe. These policies and standards are periodically reviewed 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. Changes to this Privacy Statement

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 in March 2025.

## 9. Contact and questions

To learn more about how we protect and use your personal data, or if you wish to exercise your rights as a data subject, please send an email to the local data protection officer as indicated in the overview below.

Location	local DPO
ING Bank N.V., Prague branch, Českomoravská 2420/15, Libeň, 190 00 Prague 9, Czech Republic	<a href="mailto:dpo-cz@ing.com">dpo-cz@ing.com</a>