

Everything you need to know about cookies

1. What are cookies and similar technologies?

Cookies are small text files that we place and read on your computer, tablet or mobile phone when you use **ing.be** (and our online applications (apps), such as ING Smart Banking and My Account). They contain unique codes that ensure that you as a user are recognised on your next visit to these pages. **This enables us to improve our website and apps while still ensuring your privacy.**

We use cookies to measure and analyse your online behaviour on our pages so we can improve the content of our pages. Cookies also enable us to adapt our pages to your interests and preferences, such as your preferred language. Cookies and similar technologies (pixels and encrypted/'hashed' email addresses) also help us make our website and online advertisements more personal and appealing to you. More detailed information about similar technologies can be found under What do we mean by similar technologies?

A list of the cookies used by ING is set out in the table at the bottom of this document.

2. How can you as a user manage ING cookies and similar technologies?

- 1) **ING asks you which cookies and similar technologies you want and requests your consent.**

You choose which cookies you want to receive. The only cookies that you cannot refuse are the basic cookies (see: What are the 3 different levels of cookies used by ING?). You can accept/refuse the other two levels of cookies (commercial and marketing) by ticking them or not ticking them in the popup window on your very first visit to ing.be. You save and confirm your choice regarding which cookies you want to receive/refuse by clicking on 'Accept cookies'.

- 2) **You can also delete cookies or accept/refuse other levels of cookies if you change your mind.**

Do you want to change or just see your current cookie preferences? You can consult and adjust your current choice at any time: **just go to ing.be, scroll all the way down and click on 'cookie preferences' on the left in the grey box.** You can also delete your cookies by using your browser's internet options. When you revisit ing.be, we will ask you again about your cookie preference.

How can you change the settings of the most common browsers? You can adapt **your personal preferences** regarding cookies via the settings of **your browser** (e.g. Internet Explorer, Firefox or Chrome) and of your device (e.g. tablet, computer or smartphone).

Deleting cookies in **Internet Explorer**: Go to Tools > Internet options > General tab. Under Browsing history, click “Delete”. You may not want to delete everything. In any case, make sure that “Cookies” is ticked when you click “Delete”.

Deleting cookies in **Firefox**: Go to Tools > Options > Privacy tab. Click on “Clear your recent history”. Under Details you can choose exactly what to clear. In any case, make sure you tick “Cookies”. You can also indicate how old the cookies must be. Here choose “Everything”.

Deleting cookies in **Chrome**: At the top right, go to More > Settings. Scroll down to the bottom and click on “Advanced”. Then go to Site settings in Privacy and security. Click Cookies > See all cookies and site data > Remove All. Confirm by clicking “Clear all”.

Please note that you must update the settings for every browser and device you use.

If you use more than one browser and/or device, you must make a choice for each browser and device separately. Also note that if several people use the same device, it is possible that one person may accept the use of cookies for the device and that this choice may also apply to the other users. This will depend on the settings for your browser and/or device. To configure the use of cookies for each person if there is more than one user, you can also choose to create a separate user profile for each person (e.g. in your Windows profile) in order to prevent someone from accepting cookies that you do not want.

3) Can other websites still show me personalised ING advertisements even if I have not consented to ING’s marketing cookies?

Yes, that is still possible. If you have given your consent to other websites or social media platforms for their cookies or similar technologies, they may place ING advertisements which they believe may be relevant to you on the basis of their selection criteria. These cookies are managed entirely by these other websites or social media platforms and are a protected environment as far as ING is concerned. You should therefore manage your consent to cookies and settings on that website or platform. Details of how to do this can often be found on the website itself, or you can apply the method as described in You can also delete cookies or accept other cookies if you change your mind.

3. How long do cookies last?

Temporary cookies are stored in your browser for a limited period. These are erased automatically when you close your browser. In Home'Bank, for example, we use temporary cookies. These temporary cookies are called "session cookies". Session cookies are stored on your computer temporarily. They are erased immediately when you log out or interrupt the connection.

Persistent cookies remain in your browser until their expiry date unless you remove them yourself using your browser's internet options.

You can find details of how long each cookie is stored on your browser in the summary table below in the section Which cookies and similar technologies are used by ING?

4. What are the 3 different levels of cookies used by ING?

ING distinguishes between **3 types of cookies**:

1. basic cookies (also known as "essential")
2. commercial cookies
3. marketing cookies

These 3 types of cookies are described in more detail below.

5. What are basic cookies?

Basic cookies cannot be adapted because they are vital for making the website function properly and for offering you the best possible user experience. They are essential for ensuring that the website works properly.

With these basic cookies:

- we make sure that your display and other technical settings are correct
- we remember your preferences, such as your language
- we avoid you having to make the same choices again every time you visit our website. For example, we can enter some of your login details for Home'Bank automatically
- your visit is tracked in a database, which allows us to measure and analyse the use of our pages and thus improve their content. For instance, basic cookies show us which pages on the website are visited the most, help us to record any

problems with the website and let us see whether the content of our pages is effective or not. We use this information to analyse the traffic on the website, but we do not examine this information for the purpose of identifying an individual person. These cookies enable us to understand the general pattern of usage of the website.

Who installs and manages basic cookies?

ING installs the basic cookies on your computer and manages them as well. For this reason, cookies of this type are also called “**first-party cookies**”. In the case of first-party cookies, ING is the 'data controller'. The data controller (DC) is the company that determines for what purposes and how personal data is processed.

Some basic cookies are generated in collaboration with a partner (such as companies that provide technology to analyse (web)pages); these are then called “**third-party cookies**”. The data are managed by the external party, but none of the data can be used by anyone but ING. These external parties are also referred to as 'data processors' of ING. At the request of ING (data controller or DC), they will process the personal data as data processors (DP).

6. What are commercial cookies?

‘**Commercial cookies**’ are intended to manage the content and advertisements **on our own website**. These commercial cookies take account of your personal browsing behaviour on our own pages and/or other customer data from our database. These cookies provide personalised content and advertisements on our website.

We use these commercial cookies in order to:

- improve the content and user experience of our website
- link you securely, as an identified ING customer (e.g. after logging into Home’Bank or ING Smart Banking), to your personal data in our database. To make our website relevant to you, we can also add a limited set of data from our database to your cookies (such as type of customer, age group, gender, products or services that you already have, etc.)
- make our website relevant to all visitors, both customers and noncustomers, because we can display information and advertisements based on the browsing behaviour of our visitors. For example, we can check which pages you have browsed before, what you click on, which online applications you begin and whether or not you complete them, etc. For instance, we will note that you

have interrupted your online application for a credit card. On your next visit to ing.be we can ask you if you want to continue your application

- avoid showing you information or advertisements on our pages that are not relevant to you. For example, we will only show you information about motorcycle insurance if we know that you do not currently have this with ING.
- we measure the effectiveness of our online campaigns and the response to them from our target audience. For example, we examine the characteristics of those who have clicked on our campaign (e.g. average age), how many people have bought the advertised product, and so on.

Of course, we only use these commercial cookies if you have given us your consent to do so. If you have consented to the use of cookies, we may use them to adapt our pages with more relevant information for you. The information relating to these commercial cookies remains with ING and is only used by ING.

What if you refuse these commercial cookies? Then you will still see advertisements from ING. But these advertisements will not take your browsing behaviour and/or other customer data into account.

Who installs and manages commercial cookies?

ING installs the commercial cookies on your computer and manages them as well. For this reason, cookies of this type are also called “**first-party cookies**”.

In the case of first-party cookies, ING is the 'data controller'. The data controller (DC) is the company that determines for what purposes and how personal data is processed.

Some commercial cookies are generated in collaboration with a partner (such as companies that provide technology to analyse websites). These are called “**third-party cookies**”. The data is then managed by the external party but can only be used by ING. These external parties are also referred to as 'data processors' of ING. At the request of ING (data controller or DC), they will process the personal data as data processors (DP).

7. What are ‘marketing cookies’ and similar technologies?

‘**Marketing cookies**’ and similar technologies, such as pixels and encrypted email addresses (or ‘hashed e-mails’) are intended for placing advertisements **on your social media and other third-party websites**. These marketing cookies take account of your personal browsing behaviour on our own website, other customer data from our database and/or your personal browsing behaviour away from our website (such as your social media or other websites).

As previously described, the use of marketing cookies may be supplemented with similar technologies, such as pixels and encrypted e-mail addresses (see: What do we mean by similar technologies?).

We use these marketing cookies and similar technologies in order to:

- install pixels, for example, on our own website so that you can see advertisements on your social media that are tailored to your interests. Our aim is to provide you with an online offering and user experience that is better suited to you, even away from ing.be. This means that you can avoid the standard advertisements that everyone sees.
- ensure that our advertisements on your social media and/or other third-party websites are relevant and personal. For this purpose, we share your encrypted e-mail address with these platforms so that the companies with which we collaborate can display our campaigns when you visit their websites or social media platforms.
- place relevant advertisements on your personal social media pages.

For example, if you look for travel insurance on ing.be but decide not to take out a policy yet, you may see an advertisement about the benefits of ING travel insurance on your social media.

- customise our website based on data about your browsing behaviour on third-party websites with which ING collaborates. For example, if we are informed by a real estate website that you are looking for a new home, this may mean that you are shown a campaign for an ING home loan.
- avoid showing you the same advertisements and promotions every time that are not relevant to you.
- measure the effectiveness of our marketing campaigns on other websites. For example, we examine what the characteristics are of the people who have clicked on our campaign (e.g. average age), how many people have bought the advertised product, and so on.

Of course, we only use these marketing cookies if you have given us your consent to do so. If you have consented to the use of marketing cookies and similar technologies, ING may use them to send certain data to an external party (such as an advertising agency) if ING wants to launch a campaign on a third-party website.

What if you refuse these marketing cookies? Then you will still see advertisements from ING. But these advertisements will not take account of your browsing behaviour and/or other customer data.

Who installs and manages marketing cookies and similar technologies?

Marketing cookies and similar technologies can also be installed by external parties with which we collaborate, such as advertising agencies or social media platforms. For these purposes, ING authorises these external parties to install a cookie on our website. These “**third-party cookies**” also collect information about the use of our website. They do this during your visit to our website and ensure that our website sends certain data to a platform belonging to this third party. This data is then used to display more relevant information to you on the third-party website. The data is managed by the external party but can only be used by ING. These external parties are also referred to as 'data processors' of ING. At the request of ING (data controller or DC), they will process the personal data as data processors (DP).

An external party can also install cookies or similar technologies itself on its own platform or website. You can only accept/refuse these cookies via that platform. (See: Can other websites still show me personalised ING advertisements even if I have not consented to ING's marketing cookies?)

8. What do we mean by similar technologies?

Similar technologies that we use at ING are pixels, Conversion API and encrypted e-mail addresses (also known as 'hashed e-mails').

What are pixels and how do we use them?

A **pixel** is the smallest part of an image. Just like cookies, we can use pixels to collect information about visitors and their online behaviour on a page belonging to ING or an external party with which we collaborate. This is done using a tracking code linked to the pixel.

A pixel will only be activated if a user browses a page where a pixel has been installed and, unlike a cookie, a pixel will not be stored anywhere. So, in order to identify a visitor to a website, a cookie is required alongside a pixel since the former may contain identification information relating to the user of the website.

If, as a visitor (i.e. both ING customers and non-customers), you respond to an online advertisement and/or visit a website, the tracking code of the pixel(s) in this advertisement or website is retrieved. This enables us to work out how many visitors show an interest in an online advertisement and/or website, so we can measure the interest and user reach of our online campaigns. For example, if you click on an ING advertisement on your social media or another website, this usually directs you to an

ING page with more details about the product or service in question. The pixel tells us which website/platform you were browsing when you clicked on the ING advertisement.

Thanks to pixels, we can optimise both our website and other websites and social media using your user profile and make the respective content relevant to you. For example, because you have shown an interest in a specific product on an ING page, we can display more relevant advertising to you on your social media.

What is Conversion API and how do we use it?

Another way to make the content relevant to you, is by using a **Conversion API (CAPI)**. The Conversion API creates a connection between ING's own marketing Data and the Meta systems (Meta platforms, formerly known as Facebook). The goal is to send event and conversion data to Meta Ads Manager. The aim is to optimize campaigns and report campaign results.

The difference between Pixel and CAPI is the method of sending data. With the Pixel, Meta directly collects the data in the web browser, while with CAPI it uses the advertiser's own data on their server and then sends it to Meta in hashed format.

What do we mean by encrypted e-mail addresses ('hashed emails')? 'Hashing' is a form of encryption. In the case of a **hashed e-mail address**, the e-mail address is transformed into a unique code that cannot be converted back into the original code. An encryption algorithm converts e-mail addresses into a hexadecimal string of numbers and letters so that every email becomes an unrecognisable jumble of numbers and letters. This code cannot be traced back to the e-mail address. To identify the user of the third party website, the e-mail address obviously has to be verified. As ING has locked this information, you will not run the risk of your data being identifiable if the third party's database is hacked. The address is hashed and therefore remains unrecognisable. Of course, ING can only do this if your email address is known to us and you have consented to the use of marketing cookies and similar technologies.

9. What about your privacy?

We respect your privacy and only use commercial and marketing cookies if you have given us your **explicit consent** to do so, in accordance with European regulations (**GDPR** - General Data Protection Regulation). More information about the processing of your personal data by ING in Belgium can be found in [ING's Privacy Statement](#).

10. Do you have a complaint?

If you have any questions or want to know more about ING's Cookie Policy and how we use your personal data, **you can contact us through our usual channels:**

Via ing.be, ING Home'Bank, Business'Bank or ING Smart Banking (app), mentioning that your request relates to "privacy"

- Contact your local ING branch, your account manager, your personal or private banker
- Call us on +32.2.464.60.04
- Send an e-mail with the subject "privacy" to info@ing.be.

If you do not agree or if you have a complaint with regard to the processing of your personal data, you can send your request with the reference "privacy" by:

- Post: ING Belgium, Complaints management, Sint-Michielswarande 60, B1040 Brussels or
- E-mail: plaintes@ing.be / klachten@ing.be

If your case has not been handled properly or if you want to receive more information about our Cookie Policy, then you can submit a written request to the person responsible for data protection at ING ("ING Data Protection Officer") by:

- Post: ING Privacy Office, Sint-Michielswarande 60, B-1040 Brussels or
- E-mail: ing-be-PrivacyOffice@ing.com

If you contact us, we are obliged to identify you correctly. We may therefore ask you to visit an ING branch in order to be properly identified. We may also ask you to present a valid identity card or passport.

What if you are not satisfied with our response to your complaint? You can always contact the Belgian Data Protection Authority (DPA). You can contact the Belgian Data Protection Authority by e-mail: contact@apd-gba.be or by post for the attention of the Data Protection Authority, rue de la Press 35, 1000 Brussels.

11. What is the scope of this cookie policy?

This is the cookie policy of ING Belgium n.v./s.a.: ING Belgium n.v./s.a. - Bank/Lender - Avenue Marnix 24, B-1000 Brussels – Brussels RPM/RPR – VAT BE 0403.200.393 - BIC: BBRUBEBB – IBAN: BE45 3109 1560 2789 – Insurance broker registered with the FSMA under the code number 0403.200.393. - www.ing.be - Publisher: Philippe Wallez, Avenue Marnix 24, B-1000 Brussels 03/20.

We may amend this cookie policy to remain compliant with any changes in law and/or to reflect how our business processes personal data. The most recent version is available at [ING.be](https://www.ing.be).

12. Which cookies and similar technologies are used by ING?

Below is a list of the cookies that we use in **ing.be**, in each case with further details of their purpose, validity period, type and the ownership of these cookies. This list is evolving and therefore subject to change.

Some cookies and/or similar technologies that appear in the below table under the ‘commercial ING cookies’ category also function as ‘basic cookies’ (i.e Adobe). They thus also ensure the necessary technical functioning of our website. It is therefore possible that we will place certain commercial cookies on your computer system via our website, even if you only accept our basic cookies. But we will never use these cookies for commercial purposes if you did not give us your consent to do so.

1. Basic Cookies (also known as “essential cookies”)

These essential cookies cannot be refused on ING.be website.

Ownership	Type of cookies	Name	Purpose	Validity
ING	Essential cookies	___r489750 ___so489750 ___tk489750 ___tk489750	Necessary for digital banking	1 year
ING	Essential cookies	gciid	Random and anonymous value that is used to identify which actions on ING website have been	1 month

			performed by the same browser. This information is used to optimize customer journeys	
Google (Sent by google reCAPTCHA)	Essential cookies	_GRECAPTCHA	This cookie is necessary for reCAPTCHA to make an assessment to verify whether the traffic on the site is legitimate or malicious	Temporary / session cookie
ING	Essential cookies	aac	enable secure digital banking	5 years
ING	Essential cookies	ak_bmsc, bm_mi, bm_sv	Cookies used in fraud prevention	1 week maximum
ING	Essential cookies	ASP.NET_SessionId	used to identify the user session on the server.	Temporary / session cookie
ING	Essential cookies	Lang, SP_language, locale	This cookie stores the language chosen by the user on the website. It allows us to	1 year

			display the right language when users come back on ing.be	
ING	Essential cookies	SP_segment	This cookie stores the user segment (private banking /retail, business). This cookie enables us to open the homepage of the last segment visited by a user	1 year
ING	Essential cookies	XSRF-TOKEN	site security in preventing Cross-Site Request Forgery attacks.	Temporarily / session cookie
ING	Essential	TS011aaa01, TS012cbef1, TS01768288, TS019d407a, TS01a0a1b8, TS01d7ddf4, W-SESSION-ID, T-SESSION-ID, NID	Load balancer cookie. It is necessary to use the website and regulate the traffic on our website.	Temporarily / session cookie

ING	Essential	fecvm	needed to keep track of the active version of the application code, served to a client. This cookie does not store any information	Temporarily / session cookie
ING	Essential	Personalization-sid / target-sid	This cookie is set to perform experiments on the website structure and is designed to ensure the best and most appropriate user experience on ing.be.	Temporarily / session cookie
ING	Essential	cookiepref	This cookie is used to remember your cookies preference	5 years
ING	Essential	EB_MPC	This cookie stores the channel segment code of the user	Temporarily / session cookie
IBM	Essential	__gdic	Enabling secure digital banking and fraud prevention	2 years

2. Commercial and marketing cookies

Ownership	Type of cookies	Name	Purpose	Validity
Webtrekk	Commercial	wt3_eid	Using Webtrekk to better understand the behaviour of visitors on the website. This will subsequently improve the user experience on the website and on other channels.	6 months
Adobe	Commercial	AMCVS_468E917D5506B4A50A4C98A6%40AdobeOrg / AMCV_468E917D5506B4A50A4C98A6%40AdobeOrg	The AMCVS cookie acts as an indicator, signifying that the session has started / ING uses Adobe Analytics to gain insight into the usage of the	Session cookies

			ING website and apps. This information is used to optimize the user experience.	
Adobe	Commercial	s_sess	This cookie temporary stores analytical data processed by the core library of Adobe Analytics.	Session cookie
Adobe	Commercial	mbox, mboxEdgeCluster	This cookie stores a number of values to track how you as a visitor experience personalised campaigns.	2 years
Adobe	Commercial ING cookie	aam_uuid	It is used to assign a unique ID when a user visits a website.	2 years
Facebook	Marketing	_fbp, fb	These cookies are used by Facebook to provide a number of advertising products, such as real-time	3 months

			bidding by external advertisers.	
DoubleClick.net / Google	Marketing	_ga, CONSENT, OTZ	showing personalized ING offers on social media and other parties within and outside Europe.	Max 2 years