



PRIVACY CHARTER

Version valid from
1 January 2022

GETTING TO KNOW YOU BETTER TO PROVIDE A CUSTOMISED SERVICE

Your **satisfaction** is at the heart of our concerns. **Always**. That's why, at Belfius, **respecting your privacy** and **protecting your personal data** always come first.

We process your data so that we can offer you products, innovative digital tools, services and information that are meaningful to you. In doing so, respecting your privacy is paramount. That is our **commitment**.

Which is why we have drawn up this Privacy Charter. Our aim is to inform you clearly about the way we protect your privacy and how we take your preferences into account. Your personal data will not be sold to third parties. And we conduct consistent checks to ensure that this Charter is complied with.

This Charter applies to various categories of private individuals, whose personal data we collect and process:

- > personal and business customers of Belfius
- > prospects
- > individuals, who may or may not be customers, who contact Belfius themselves.

You can rest assured: we guarantee the security of your personal data, just as we do for your money.

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1. Who is responsible for processing your personal data?

Belfius Bank NV is responsible for banking matters and non-financial services, and Belfius Insurance NV for insurance matters. Their registered office is situated at Karel Rogierplein 11 – 1210 Brussels, (referred to collectively hereinafter as 'Belfius').

This Charter is designed to provide you with information about the way your personal data is processed for which Belfius is responsible.

You can contact our Data Protection Officer ('DPO') by writing to him/her at the following address: Belfius, for the attention of the DPO – Karel Rogierplein 11 – 1210 Brussels, or by sending an e-mail to bancassureur.privacy@belfius.be

The regulations governing the processing of personal data relate only to natural persons and to persons who are representing a legal entity, such as a company, municipality or association.

The regulations do not apply to the legal entity itself.

2. What does processing personal data involve?

Personal data encompasses all information about you as an identified or identifiable natural person. This may be your contact details, an identification number, financial data, insurance details, geographical details, online identification data or any other type of personal data.

The processing of personal data covers every type of operation performed on this data, such as its collection, recording, use or storage.

Belfius processes your personal data for a variety of purposes (see point 5 of this Privacy Charter), based on various legal grounds (see point 6). It also ensures that only data that is required is processed.

3. What type of personal data is processed?

It may be your own personal data, as well as external data that Belfius combines with your personal data. Exactly what type of data is set out below.

3.1 Your personal data

Personal data in the context of your personal and/or business relationship with Belfius

- > identification data, such as your last name and first name, address, place and date of birth, e-mail address, photo, telephone and/or mobile number, token, etc.
- > data relating to a (proposal for a) contract: information about your occupation and employment, solvency, family situation, salary, level of education/training, shopping habits and so on
- > data linked to your products and assets: accounts, cards, savings and investment products, insurance products, loans, etc.
- > financial and transaction data: cash withdrawals, amounts, notifications and payments to or from your accounts or third-party accounts, as well as information about your payment accounts at other banks if you have added them into any Belfius channels (such as Belfius Mobile). By giving your consent (for example by using a PIN code, card reader, etc.) for payment transactions to be carried out, you expressly agree to the processing and storage of the personal data required for the transactions to be carried out
- > data about your browsing habits on Belfius websites and within Belfius apps: viewing data, simulations, purchases or enquiries, responses to sales proposals, such as whether or not you click on advertising on the original website (e.g. the website where you clicked on Belfius advertising, etc.)
- > data relating to your personal preferences: information about your habits and preferences regarding the use of communication and relationship channels (website, apps, contact persons, etc.), information about your personal lifestyle, hobbies, interests, etc.
- > data relating to our satisfaction surveys
- > data about geolocation (i.e. where you are located), for example when you are looking for the nearest ATM in Belgium or abroad, using the Belfius Mobile app
- > location data that Belfius deduces from your transaction details and from your use of our non-financial services

- > audiovisual data from our security cameras used to guarantee your safety and that of our employees in-branch
- > recorded data (during chats, video conversations, e-mails, telephone calls) via Belfius Connect, the complaints management department or our branches. This data is recorded for the purpose of improving the quality of our services or to serve as evidence of what was said
- > data obtained via third parties, such as data from the National Register, the Belgian State Gazette, World-Check, the National Bank of Belgium's Central Individual Credit Register (CCP/CKP), or data that we consult from external companies to supplement or enhance our own data
- > data gathered via cookies, which may provide information for example about your preferences, or which collect statistical information. You will find more information about this on our websites, for example from belfius.be/cookies
- > data, such as the type of device and version of the operating system you are working with in order, for example, to be able to provide assistance, quickly and efficiently, should you contact us with a technical problem
- > all other information or data required to assess the continuation of the customer relationship

Specifically for insurance business

- > data linked to your insurance policies, claims and complaints
- > health details required to take out and implement certain insurance policies (such as life insurance and hospitalisation policies) and in the event of claims involving physical injuries. This data may only be processed by the consulting physician, your insurance intermediary and by Belfius Insurance staff, provided they are working on one or more associated tasks, and by any third parties whose assistance is required for these tasks to be carried out
- > data relative to criminal convictions and offences, such as being inebriated in the context of a road accident

Specifically for the non-financial services of our partners, if you subscribe to them

- > identification details for incorporating your existing account with one of our non-financial partners within our Belfius channels
- > specific contact details that you provide when you subscribe to one of these non-financial services, such as your e-mail address, mobile phone number, etc.
- > location data, for example when you use one of these non-financial services, such as filling up without a card at the local service station or mobile parking with 4411 to identify your parking zone or ImmoVlan in order to search for nearby residences
- > data relating to your browsing habits on Belfius websites and apps, or details relating to your use of the non-financial services provided by our partners: viewing data, carrying out searches or simulations and displaying the results, making purchases or enquiries, responses to commercial proposals, such as clicking on advertising featured on a website that does not belong to Belfius, personal data that relates to your (family) situation, preferences, favourites and specific data about a purchase or transaction with our partners. For some of the services from external partners that you use via Belfius channels, your data needs to be synchronised between Belfius and the partner whose service you are using. For that reason, Belfius receives certain data from that partner
- > specifically for ImmoVlan: the data from your search (such as for property to rent or buy), the result saved from the search, your favourite properties, etc.

Specifically for new business prospects

- > personal data that you provide to Belfius before you enter into a contractual customer relationship with Belfius. This involves your identification data, contact details and information relating to a simulation or policy proposal.

3.2 External data that Belfius combines with your personal data

- > statistical information, from sources such as the Belgian bureau of statistics, Statbel
- > data relating to the condition and value of real estate property, land registry information
- > company information (such as information about directors, business managers, etc.) and contact details of representatives from various government departments, gained from external sources such as Graydon, the Belgian State Gazette, Pinakes, etc.

4. When do we collect your personal data?

We collect your data when you are in contact with Belfius, for example when you:

- > become a customer or we add you to our database as a prospect
- > contact us or we contact you
- > visit a branch
- > take part in a Belfius survey, competition, webinar or event
- > use one of our products or services
- > log into or use one of our apps or sites
- > log into or use a service of one of our non-financial partners when you have linked your account at Belfius

5. Why do we process your personal data?

We process your data for the following purposes:

5.1 Delivering contractually agreed services or preparing contracts at your request and associated accountancy and/or administrative matters

- > managing your customer file (contracts/policies and services)
- > setting up, managing and implementing bank contracts and insurance policies
- > conducting financial transactions (including payment transactions, investment services, providing credit, etc.)
- > setting up, managing and implementing non-financial services

5.2 Protecting Belfius, our customers and the public

- > preventing money laundering practices, fraud and the financing of terrorism
- > detecting and fighting insurance fraud and associated risk analysis
- > preventing and detecting market manipulation and insider trading
- > complying with various legal obligations and provisions and tax obligations
- > responding to questions from the courts and regulatory authorities to provide access to data
- > administration and risk management
- > the safety and security of people and property

5.3 To maintain and improve Belfius products and services, or developing new ones

- > the constant improvement of our services, channels and processes
- > conducting 'proof of concept' tests when Belfius is investigating new collaborations, for example with (ICT) providers or other partners
- > satisfaction surveys about our products and services
- > the assessment or adjustment of the strategy used by Belfius

5.4 To personalise your user experience and tailor our communication in line with your personal preferences

- > filling in fields in advance or suggesting accounts that you use regularly
- > filling in details already known when enquiring about additional products or services or for conducting simulations
- > avoiding asking questions that we know the answer to
- > direct marketing in order to offer you personalised insurance, financial and related and non-financial products and services and to avoid us proposing products or services that are not relevant for you

Belfius does not process data of a sensitive nature for its own direct market purposes, such as details about religion or health.

Through direct marketing we are able to:

- > (automatically) process your customer details to determine general or specific customer profiles
- > better assess your needs and gear our offering accordingly. For example:
 - to offer you a credit card that suits you better
 - to propose setting up a standing order for recurrent payments

- > offer you appropriate products at the important moments of your life and, for example:
 - provide you with advice when you are starting out on the employment market
 - propose the best insurance when buying a home
- > keep you up to date with your investment insurance policies, the prices of shares or other investment products, based on the composition of your portfolio
- > send you a notification at relevant times or locations via our app
- > advise you about tax optimisation, for example by offering you a pension savings product
- > offer you products or services provided by Belfius partners that we believe may be of interest to you

Personalised sales campaigns based on your personal data will only be conducted in the name of the Belfius group.

5.5 Profiling and aggregated reporting

- > conducting surveys
- > analyses and measurements to gain insights into the profile and habits of our customers
- > setting up predictive modelling
- > any form of automated processing of data in which personal data is used to evaluate certain personal aspects of customers or prospects, in particular to analyse or predict their professional achievements, economic situation, health, personal preferences, interests, reliability, habits, location or movements
- > deriving aggregated statistics about our customer base
- > reports that examine the browsing habits of our customer base

5.6 To contact you

- > via a Belfius employee at the branch
- > by telephone, (video)chat (by the people at Belfius Connect or our branch staff)
- > via your e-mail address
- > via Belfius's digital channels

6. What are the legal grounds on which processing your personal data is based?

Belfius will process your personal data in one of the following cases only:

- > when Belfius has asked for your permission and you (or your legal representative) has given it to us. You may withdraw this consent at any time. This withdrawal of consent will only apply to the period after withdrawal and hence will not affect the legitimacy of any processing that took place prior to the time of withdrawal
- > when you grant permission to a third party (e.g. Bpost, other insurers or banks, non-financial partners) to pass your personal data on to Belfius
- > when Belfius executes a contract or takes pre-contractual measures
- > when Belfius is required to do so under the law or pursuant to regulations
- > based on a 'legitimate interest' in which Belfius will give very serious consideration to the interests of Belfius and your own interests, including protecting your privacy

Legitimate interests include:

- > preventing fraud and misuse
- > the security of the network and IT systems, preventing unauthorised access, viruses and service attacks that may cause damage to the IT systems
- > managing disputes
- > evaluating the overall customer relationship
- > offering products or services that correspond as closely as possible with your needs and requirements
- > improving processes and apps
- > producing studies, models and statistics
- > creating synergies, enhancements in efficiency or other organisation or process-related benefits
- > reinsuring insurance risks
- > direct marketing
- > conducting (satisfaction) surveys

7. Who can we pass your personal data on to?

Belfius will not sell your personal data to third parties. Below is a summary of occasions when data may be exchanged:

7.1 The Belfius group

The Belfius group is made up mainly of Belfius Bank and the independent network of branches (authorised agents), Belfius Insurance, Belfius Investment Partners, Crefius, Elantis, Belfius Lease, Belfius Lease Services, Belfius Auto Lease, Belfius Commercial Finance, Belfius Asset Finance Holding, Corona Direct, VDL-Interass, Bureau Laveaux & Martin, Qualitass, The Studio, Jaimy, Jane, Belfius Insurance Services Finance, Belfius Financing Company, Belfius Immo, Belfius Ireland Unltd, etc. The composition of the Belfius group may, of course, change constantly.

For some of the purposes stated in point 5, data may sometimes be exchanged within the Belfius group. The companies and staff within the Belfius group will only have access to your data insofar as it is necessary for them to carry out their work (for example to set insurance rates).

7.2 Specific service providers

For operating reasons, it may be necessary sometimes for us to call on the services of carefully selected organisations outside our group, such as Mastercard and Visa.

Also, for some specific services, we may work with external parties such as advertising or events agencies, research agencies, ICT service providers, online and social network providers, security personnel, legal advisers, court bailiffs, debt collection agencies, etc.

In the same way, in order to fulfil various obligations vis-à-vis its policyholders and/or parties covered by insurance policies, Belfius also calls on specialised service providers, such as: the government e-Health platform (ehealth.fgov.be), claims settlement agencies, Datassur ESV (datassur.be), Assurcard nv (assurcard.be), Alfa Belgium, Promut CVBA (known under the brand name and trading name of MedExel), reinsurance companies and brokers, loss adjusters, repairers, private detectives, public authorities, etc.

Also in the context of audits and to obtain and retain certain certificates or quality labels, we are sometimes required to exchange data with external parties, mainly audit offices or other independent audit bodies, which audit our internal operations to verify that we are complying with the required quality conditions.

Belfius Insurance has a partnership agreement with the reinsurer and assistance provider, Europ Assistance. Europ Assistance is the data controller for the personal data that it collects in response to requests for assistance. You will find more information about the processing of your personal data, the purposes of the processing and the exercise of your rights in the Europ Assistance Privacy Charter on europ-assistance.be/en/privacy.

In the insurance sector, 2 specific databases have also been set up aimed at providing accurate risk analysis and enabling the fight against insurance fraud.

- > On the one hand, there is the RSR special risks database, managed by data controller, Datassur ESV (www.datassur.be). Your personal data can only be included in the RSR database in the cases that you will find on www.datassur.be/fr/services/rsr. You will find more information about Datassur's policy for processing personal data and your rights as a data subject on www.datassur.be/fr/privacy-notice-fr. To exercise your rights with regard to the RSR database, you can contact Datassur (1000 Brussels, de Meeûsquare 29, or privacy@datassur.be). Attach a copy of the front of your identity card to your letter or e-mail, so that you can be assisted more quickly.
- > On the other hand, there is the Claims Database, managed by data controller, Alfa Belgium. After reporting a claim in the motor vehicle division, a limited amount of personal data belonging to the policyholder, driver and other party involved in the claim will be passed on to Alfa Belgium to be recorded in the Claims Database. You will find more information about Alfa Belgium's policy for processing personal data and your rights as a data subject on alfa-belgium.be/fr/vie-privee. To exercise your rights with regard to the Claims Database, please contact Alfa Belgium (1000 Brussels, de Meeûsquare 29, or info@alfa-belgium.be). Attach a copy of the front of your identity card to your letter or e-mail, so that you can be assisted more quickly.

Here again, the parties authorised to use your data may only do so within the strict limits of their specific contractual or statutory duties.

If we call on the services of a company located outside the European Economic Space, we only do so if we obtain guarantees that offer the same level of protection for your personal data as there would be within the EU.

7.3 Government bodies

In some instances, Belfius is legally obliged to share certain items of personal data with institutions such as the National Bank of Belgium:

- > to evaluate the credit risk, for scientific activities or for monetary policy: send notifications to the database of non-regulated records (ENR) and data in relation to consumer credit contracts and mortgages, or data relating to the Register for Business Loans

The Register for Business Loans is a register managed by the National Bank of Belgium

(Berlaimontlaan 14, 1000 Brussels). Belfius is obliged by law in relation to business loans to divulge certain data about the borrowers and parties providing surety to this Register.

You have the right to view the data stored in this Register free of charge and also to have this data amended free of charge, where applicable.

You can contact the Data Protection Officer for the National Bank of Belgium at the National Bank's address or via dataprotection@nbb.be. You may also lodge a complaint about these registrations with the Data Protection Authority (see section 8.5 for this).

- > to provide information to the Central Contact Point (CAP)

The CAP is a database managed by the National Bank of Belgium (Berlaimontlaan 14, 1000 Brussels).

Belfius is obliged by law to divulge the data stated in article 4 of the Act of 8th July 2018 to the CAP.

For example, when you open or close a bank or payment account, or you are granted a power of attorney to it, when you conduct certain financial transactions involving cash or when you have a contractual relationship with Belfius or when you terminate such a relationship. With bank or payment accounts, Belfius is obliged to disclose the periodic balances of these accounts to the CAP. For life insurance policies, as well as for investment and related services, Belfius is obliged to notify the CAP of the periodic globalised amount, expressed in euro, to which all such financial agreements concluded with the customer relate. This data is stored in the CAP.

This means that your national register number or, if that is not known, your identification number is passed on to the Crossroads Bank for Social Security. If these identification numbers are not available, the CAP registers your last name and first official forename, date of birth, place of birth and country of birth.

The data recorded in the CAP is stored and kept there for 10 years from the end of the year in which Belfius notified the CAP of the closure of the aforementioned account, the withdrawal of a power of attorney on the account, the existence of the aforementioned financial transaction or the end of the aforementioned contractual relationship of a specific category. The data relating to the periodic balances and periodic globalised amounts is stored in the CAP for 10 years. This applies from the end of the year during which the periodic balance or periodic globalised amount are required to be established in accordance with the law for the purpose of notifying the CAP. The identification details are kept in the CAP until the end of the last of an uninterrupted period of 10 years in which no new item of data is recorded in relation to the person in question.

The data recorded in the CAP may be used, for instance, in the context of a tax investigation or as part of an investigation into criminal offences, including money laundering, the financing of terrorism and serious crime, on condition that the provisions imposed by law are complied with. The National Bank of Belgium retains the list of information enquiries made to the CAP for two calendar years.

You have the right to view the data about you held by the National Bank of Belgium, as well as to contact Belfius and the National Bank of Belgium for the amendment or deletion of any incorrect data that the CAP may have registered in your name.

- > In specific legal cases, Belfius is required to disclose information to the financial data processing unit or to court authorities or regulators

7.4 External parties outside the Belfius group with whom we offer services

- > Authorised third parties when you consent and use the legal options provided by PSD2 to integrate transaction information from your payment accounts at Belfius with these parties
- > In addition to its banking and insurance businesses, Belfius also offers services from external, non-financial partners, such as Sodexo and Monizze. You will need to subscribe to gain access to these new services. When you do, Belfius will exchange certain items of personal data with the partners in question to enable the service to be provided.
If you don't subscribe to a service, no personal data will be passed on to the partner in question. You will need to explicitly confirm the use of your personal data for each service. It will be stated for each service which items of personal data will be passed on
- > Belfius also passes on certain items of personal data when to use Belfius to access services from providers such as Payconiq and Belgian Mobile ID (itsme)

8. What are your rights when it comes to processing your personal data?

8.1 Your rights vis-à-vis Belfius

You have the right to access and view your personal data. This means that you will be told whether your personal data is being processed and you will be able to view it by means of a global view.

You have the right to have your personal data rectified or deleted. If your personal data is incorrect, incomplete or not relevant, or you wish to have it deleted, you can have it amended, supplemented or, if the law allows, deleted.

In certain cases, you also have the right to request a restriction on the processing of your personal data for a specific service. You also have the right to object to the use of your data based on legitimate interest (see point 6).

You have the right to transfer personal data. Under certain conditions, you may have some of the data you provide us with transferred to another processing controller or to yourself.

You have the right to object to your personal data being used for direct marketing. You can tell us at any time that you do not wish us to collect, store and process your personal data for direct marketing purposes. You will then receive no further commercial proposals.

You have the right not to be subject to totally automated decision-making. Some data processing is carried out in a fully automated manner, without any human intervention. For example, this enables us to respond more quickly to certain loan or insurance enquiries or, in the event of card transactions, to detect and prevent fraud and other general risks. If you do not agree with the result of one of these totally automated processes, you can always contact us.

8.2 Your rights vis-à-vis the third parties that Belfius works with

Whenever, on your initiative, personal data is exchanged with third parties, you will be able to exercise your rights vis-à-vis these parties in line with their privacy statements, which will be notified to you. If you wish to have data amended or deleted, Belfius will make reasonable efforts to notify these third parties of your wishes.

8.3 Your rights based on the individual or entity that you represent

The regulations governing the protection of privacy and your rights relating thereto apply only to natural persons (private individuals) who are either representing themselves, who are representing another natural person or who are representing a legal entity such as a company, municipality or association. The regulations do not apply to the legal entity itself.

The exercise of your rights is always linked to a single individual or entity that you represent at that particular time. Practically:

- > exercising your right to rectify or delete your personal data is limited to the individual or entity that you are representing at that time. It is your responsibility to expressly notify Belfius who you are representing when you exercise that right.
- > you can manage your preferences regarding direct marketing, use of click and browsing habits, transaction details and communication channels separately, depending on the individual or entity you are representing.

8.4 How can I exercise my rights?

There are various ways of exercising the rights set out above:

- > you can exercise the following rights via Belfius Direct Net and Belfius Mobile: right to view, right to object to the use of your personal data for direct marketing. You can also manage your preferences for the use of your click and browsing habits and the processing of your transaction data
- > by e-mail to info@belfius.be (attaching a copy of the front of your identity card)
- > by letter (attaching a copy of the front of your identity card) to Belfius – for the attention of the DPO, Karel Rogierplein 11, 1210 Brussels

In section 7.2 you will find more information about how you can exercise your rights vis-à-vis specific service providers.

8.5 Right to lodge a complaint

If you have a complaint about exercising your rights, our Complaints Management department is here to help you. You will find the various options for lodging a complaint on our webpage at www.belfius.be/plaintes ('plaintes' = complaints).

If none of the contact points stated above gives you a proper response, you should contact our Data Protection Officer ('DPO') by writing to the following address: Belfius – for the attention of the DPO, Karel Rogierplein 11, 1210 Brussels or by sending an e-mail to bancassureur.privacy@belfius.be.

If you do not agree with the viewpoint put by Belfius or wish to lodge a complaint, you can contact the Belgian Data Protection Authority (dataprotectionauthority.be/).

8.6 Your responsibility

You are responsible for keeping your details as accurate and up-to-date as possible. So please pass on any changes in good time, such as moving house, getting married, divorced, etc.

You are also responsible for keeping your personal and business contact details separate (see point 8.3).

9. How long is your personal data kept for?

We only keep your personal data for a specific and clearly described purpose. For certain types of data, there are minimum and maximum retention periods. Customer data is kept, among other reasons, for operational, legal or evidentiary reasons. Unless there are specific statutory periods that differ, data is kept in principle for 10 years after the end of the contractual customer relationship. A period of 30 years applies to data relating to business claims. Differing periods apply to insurance-related data, depending on the type of insurance.

Belfius retains data relating to prospects for a maximum of 13 months.

For the production of certain studies, risk or marketing models, insights may only be acquired within a wider timeframe. For this reason, certain data may be retained for a longer period.

10. What happens if changes are made to this Privacy Charter?

We will keep you informed of any changes.

You can always view the Privacy Charter at your branch or by visiting belfius.be/PrivacyCharter.

11. Main changes in relation to the previous version

You will find new information in the following sections:

3.1 Your personal data:

Personal data in the context of your personal and/or business relationship with Belfius
Specifically for the non-financial services of our partners, if you subscribe to them

6. What are the legal grounds used to process your personal data?

7.2 Specific service providers

7.3 Government bodies

9. How long is your personal data kept for?

The previous version of this Privacy Charter can be viewed by visiting belfius.be/privacycharter-1