



Privacy Charter

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GETTING TO KNOW YOU BETTER TO PROVIDE A CUSTOMISED SERVICE

Your satisfaction as a customer is at the heart of our concerns. **Always**. Which is why, at Belfius, **respecting your privacy** and **protecting your personal data** are two of our main priorities.

We process your data so that we can offer you products, innovative digital tools, services and information that perfectly match your needs. And for us, respecting your privacy is vitally important.

That's our **commitment to you**.

That is why we have drawn up this Privacy Charter. Our aim is to inform you about the way we protect your privacy and how we take account of your preferences. Your data is never sold to third parties and to make sure this is the case, we carry out systematic checks to ensure that this Charter is complied with.

Rest assured: just as we do for your money, we also guarantee the security of your data.

1. Who is responsible for handling and processing your personal data?

When it comes to banking activities, it is Belfius Bank SA/NV, whereas for insurance, it is Belfius Insurance SA/NV. Our registered office is situated at 11 Place Charles Rogier, 1210 Brussels (and the two companies are referred to hereinafter, together, 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 at the following address: Belfius, for the attention of the DPO – 11 Place Charles Rogier, 1210 Brussels, or by sending an e-mail to bancassuranceur.privacy@belfius.be.

The regulations regarding privacy apply only to natural persons (i.e. private individuals).

2. What’s involved with processing personal data?

Personal data encompasses all of the information relating to a natural person who is identified or identifiable. This may be your contact details, an identification number, financial data, geographical details, insurance details, online identification data or any other type of data relating to you.

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

Belfius processes your personal data for various purposes (see point 5), on various legal bases. It also ensures that only data that is necessary is processed.

3. What type of personal data is processed?

It may be:

- > identification data, such as your surname and first name, address, date and place of birth, e-mail, photo, etc.
- > data relative to a (proposed) contract/policy: information about your profession and occupation, solvency, family situation, salary, level of education/training, shopping habits and so on.
- > details relative to the products you have with us and your assets: accounts, cards, savings and investment products, etc.
- > financial details and transaction data: withdrawals, amounts, notifications, payments to or from your accounts or the account of other parties, and information about your payment accounts at other banks, if you have added them in any of the various Belfius channels (such as Belfius Mobile), etc.
- > details about your browsing habits on Belfius websites, as well as all of the sites on which Belfius has an advertising presence and with Belfius apps: viewing details, carrying out financial simulations, making purchases or enquiries, responses to sales proposals, etc.
- > details about your personal browsing preferences: information about your habits and preferences regarding the use of Belfius communication and relationship channels (website, apps, contacts, etc.), information about your lifestyle, your hobbies and so on.
- > data relative to our satisfaction surveys.
- > data about geolocation (i.e. the place where you are), for example when you are looking for the nearest ATM in Belgium or abroad, using the Belfius Mobile app.
- > audiovisual data from our security and surveillance cameras used to guarantee your safety and that of our in-branch staff.
- > recorded data (chats, video chats, e-mails, telephone calls) obtained via Belfius Connect, the complaints management department or our branches. This data may be recorded, for example, to enhance the quality of our services or for reasons of providing proof.
- > data obtained via third parties, such as from the National Register, the Belgian State Gazette, World-Check, the National Bank of Belgium’s Central Individual Credit Register (CCP/CKP), or data from external companies that we use to supplement or enhance our own data.
- > data gathered via cookies. Cookies are essential for enabling our websites to operate correctly. They fulfil various roles: they remember your preferences, collect statistical data and adjust the content of our sites to suit your needs. More information is available from our websites, such as belfius.be/cookies.
- > all other information or details required to begin and/or continue the customer relationship.

Specifically for insurance activities:

- > data relative to your insurance policies, claims, complaints and credits.
- > 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 medical consultant, your insurance intermediary and Belfius Insurance staff – provided they are working on one or more associated tasks – and by any third parties whose assistance is required in the context of carrying out these tasks.
- > data relative to criminal convictions and offences, such as being inebriated in the context of a road accident.

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
- > contact us or we contact you
- > visit a branch
- > take part in a survey, webinar or Belfius event
- > use one of our products or services
- > connect to our apps or our websites

5. Why do we process your personal data?

We process your data, in particular to:

- > manage your customer file (policies and services)
- > contact you
- > enter into, manage and implement bank contracts and insurance policies
- > execute financial transactions (such as payments, investment services, granting loans, etc.)
- > ensure the constant improvement of our services, channels and processes
- > ensure the safety/security of individuals and property
- > conduct satisfaction surveys about our products and services
- > carry out surveys, produce models and statistics
- > provide administration and manage risks
- > prevent money laundering, fraud and the financing of terrorism
- > prevent and detect market manipulations and insider trading
- > respect various regulatory obligations and statutory provisions, as well as fiscal obligations
- > respond to legitimate requests from the legal or audit authorities to access data
- > pre-complete fields or suggest accounts used regularly
- > pre-complete details already known when requesting additional products or services or to carry out financial simulations
- > carry out direct marketing so we can offer you personalised insurance, (non-)financial and other products and services, and avoid offering you products or services that are not relevant for you

As such, we may:

- > process your data (automatically) in order to determine general or specific customer profiles
- > better evaluate your needs and target our offers. This may be to offer you, for example:
 - a credit card that best suits you
 - create a standing order for your recurrent payments

- offer you specific products at certain key moments of your life and, for example:
 - to advise you when you are entering the workforce
 - to offer you the best form of insurance when purchasing a home
- keep you informed of your insurance investments, share prices or other investment products, depending on the composition of your portfolio
- send you a notification via our app, when and where appropriate
- advice you on tax optimisation, for example by offering you a pension savings product
- offer you, via direct marketing, products or services provided by Belfius partners that we believe may interest you, such as tickets for a match involving the Belgian national hockey team

Belfius does not process data of a sensitive nature, for direct marketing purposes, such as, details relating to religion or health.

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

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

- when we have asked your permission to do so and you have granted that permission. You may withdraw your consent at any time. This withdrawal of consent will apply only to the period after withdrawal and hence will not affect the legitimacy of any processing of operations that may have occurred before that time
- when we execute a contract or take pre-contractual measures
- when we are required to comply with a legal or regulatory obligation
- on the basis of “legitimate interest”. Where appropriate, we will make every effort to maintain a balance between the interests of Belfius and your own interests, particularly in terms of protecting your privacy.

“Legitimate interests” includes:

- preventing fraud and misuse
- managing disputes
- evaluating the overall customer relationship
- offering products or services that meet your needs and requirements wherever possible
- improving processes and apps
- reinsuring insurance risks
- direct marketing

7. Whom may we pass your personal data on to?

Belfius will not sell your personal data outside the Belfius group for the sales campaigns of other companies.

The Belfius group is made up mainly of Belfius Bank and the network of independent branches (authorised agents), Belfius Insurance, Belfius Investment Partners, Crefius, Elantis, Belfius Lease, Belfius Auto Lease, Belfius Commercial Finance, Corona, VDL-Interass, Bureau Laveaux & Martin, Qualitass, The Studio, etc. The composition of the Belfius group may, of course, change.

Data may be exchanged within the Belfius group for certain purposes stated in point 5. Group companies and staff will only access your data when necessary for operating and servicing reasons, as part of their duties (for example to set insurance rates).

For operating reasons, we may sometimes call on the services of carefully selected external organisations, such as MasterCard and Visa. For some specific services we may also work with external partners, such as advertising or events agencies, research agencies, Internet access providers and social networks, security staff, legal advisers, Court bailiffs and so on.

In the same way, in order to fulfil some obligations vis-à-vis policyholders and/or parties covered by insurance policies, Belfius calls on other specialist service-providers, such as the eHealth platform (ehealth.fgov.be), claims settlement agencies, the EIG Datassur (datassur.be), AssurCard SA (assurcard.be), reinsurance companies and brokers, repairers, private detectives and public authorities, etc.

In this context, the parties authorised to use your data may only do so within the strict limits of their specific contractual or statutory task.

Also in this context, if we call on the services of companies located outside the European Economic Area, we will only do so if we are certain that those companies guarantee the same level of protection for personal data as the protection provided in Europe.

In certain cases, we are legally bound to pass on specific personal data to institutions such as the National Bank of Belgium, in particular data enabling the evaluation of credit risk, notices to the database of unregulated records, data in relation to consumer credit contracts and mortgages, or data relating to the Central Individual Credit Register.

8. What are your rights in terms of how your personal data is processed?

8.1. Your rights

You have a **right to access and view your personal data**. In other words, you can obtain confirmation as to whether or not your personal data are being processed and you can view it overall.

You can **have your personal data rectified or erased**. If your personal data are incorrect, incomplete or inaccurate, you can also have it amended, supplemented or, if the law allows, deleted.

In certain cases, you also the **right to obtain the restriction of processing your data** for a specific service, as well as the right to object to your data being used, based on legitimate interest (see point 6).

You also have the **right to transfer data**. Some of the data that you have sent may be transferred, on certain terms, to another processing controller or to yourself.

You have the **right to object 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 data (including your click-through and browsing habits, as well as your transactional data) for direct marketing purposes. Where applicable, you will then no longer receive commercial offerings.

You have the **right to oppose against totally automated individual decision-making**. Some data processing processes and operations are carried out in a totally automated manner, without human intervention. In this way, we are able, for example, to respond even more quickly to certain loan or insurance applications. If you do not agree with the result of one of these totally automated processes, you can always contact us.

8.2. How can I exercise my rights?

There are a number of ways to exercise the rights stated above:

- > you can use Belfius Direct Net, Belfius Mobile and Belfius Tablet to exercise the following rights: the right to access your personal data, the right to view and amend your personal data, as well as the right to object to the use of your personal data for direct marketing
- > you can send an e-mail to info@belfius.be (attaching a copy of the front of your identity card)

8.3. Right to complain

If the points of contact mentioned above do not provide you with the responses you want, our complaints management department is there to help you.

The following page: <https://www.belfius.be/retail/fr/contact/plaintes/> sets out your options for lodging a complaint.

If you dispute the point of view presented by Belfius, please contact the Belgian Data Protection Commission (privacycommission.be).

9. How long will your personal data be kept for?

That depends on the type of data and regulations involved. For some types of data there are minimum storage periods, while for others there are maximums. Belfius also applied different procedures for existing customers and prospective customers. For existing customers, some data is kept for operating or statutory reasons. For prospective customers, Belfius keeps their data for a maximum of 13 months.

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

We will inform you of any modifications made to this charter.