



KBC Bank Ireland Data Protection Notice

This Data Protection Notice
is effective as and from 22 August 2019

THE BANK OF YOU

 Drop in  1800 93 92 44  kbc.ie

At KBC your privacy is very important to us.

It is one of our fundamental responsibilities as a bank to ensure that we protect the information entrusted to us by you.

This Data Protection Notice looks to answer your important questions about the processing of personal information by KBC. Please take some time to read this Data Protection Notice carefully.

In this Data Protection Notice, we use the terms "KBC Bank Ireland", "KBC" or "we" to refer collectively to KBC Bank Ireland plc, its subsidiaries and KBC Bank NV, Dublin Branch.

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1. Introduction

1.1. KBC Bank Ireland and the KBC Group

KBC has been proudly serving our customers in Ireland for over 40 years. Employing over 1,000 staff across Ireland, our head office is situated at Sandwith Street, Dublin 2.

As one of Ireland's leading banks and a member of one of Europe's largest banking groups, KBC provides personal and corporate banking services to our customers throughout Ireland. We provide a range of products and services to personal customers including current accounts, deposit accounts, investment products, home loans, home insurance, life assurance, pensions, credit cards and personal loans. Our products and services are distributed through the nationwide KBC Hub and broker networks, by telephone via the dedicated Retail Sales Team as well as through our website and online and mobile banking platforms. KBC is a public limited company registered in the Companies Registration Office under Company Number 40537. Our registered office is at Sandwith Street, Dublin 2. We are a wholly owned subsidiary of KBC Bank N.V. KBC is a licensed bank regulated by the Central Bank of Ireland.

KBC is a member of the KBC Group, an integrated banking and insurance group comprising a group of companies which work together closely to develop and distribute banking, investment and insurance products and offer related financial services. The KBC Group is active in Belgium, the Czech Republic, Slovakia, Hungary, Bulgaria and Ireland.

Details on how KBC Insurance NV (Irish Branch), trading as KBC Life and Pensions, can use your personal information are contained in the KBC Life and Pensions Data Protection Notice. The most recent version of this notice is available at <https://www.kbc.ie/data-protection>

1.2. How you can contact KBC

If you have any questions about your privacy rights or if you would like to change your privacy preferences, you can contact us in the following ways:

- By dropping in to or calling your nearest KBC Hub;
- By contacting one of our Customer Service Representatives by phone on 1800 93 92 44 or by email at customerservices@kbc.ie
- By using the **Live Chat** service on the KBC website;
- If you have specific queries about this Data Protection Notice or KBC's approach to privacy, you can also contact our dedicated Data Protection Officer who will ensure that your query is treated in a confidential manner by sending an email to dataprotectionofficer@kbc.ie; or,
- By writing to the **Data Protection Officer**, KBC Bank Ireland plc, Sandwith Street, Dublin 2;
- If you do not agree with the response you receive from KBC, you are entitled to lodge a complaint with the Data Protection Commission:

Data Protection Commission
21 Fitzwilliam Square North
Dublin 2
D02 RD28

Phone: + 353 57 868 4800 /
+ 353 761 104 800
LoCall: 1890 25 22 31
Fax: + 353 57 868 4757
Email: info@dataprotection.ie

You can visit the website of the Office of the Data Protection Commissioner at www.dataprotection.ie for more details.

2.

How can you control the personal information KBC holds about you?

When your personal information is handled in connection with a KBC product or service, you are entitled to rely on a number of rights. These rights allow you to exercise meaningful control over the way in which your personal information is processed. You may execute any of these rights free of charge (in certain exceptional circumstances a reasonable fee may be charged or KBC may refuse to act on the request) and we may ask you to verify your identity prior to proceeding with your instruction by way of requesting additional information/documentation from you. Once we are satisfied that we have effectively verified your identity, we will respond to the majority of requests without undue delay and within a one month period i.e. 30 calendar days of receipt of the request. KBC will action your request to have your personal information corrected within 10 calendar days. These periods may be extended in exceptional circumstances and we will inform you where the extended period applies to you along with an explanation of the reasons for the extension. Further information on how you may execute these rights is outlined in the Data Protection section of KBC.ie or alternatively by contacting us using the channels outlined in [Section 2.6] below.

For example, you are entitled to:

2.1. Access your personal information

You can look to access the personal information we hold about you by contacting us with a data access request using the channels outlined in [Section 2.6] below. We will endeavour to provide you with as complete a list of personal information as soon as possible. However, it can happen that some personal information from back-up files, logs and stored records may not be included in that list as this information is not processed by KBC on an ongoing basis and it is not therefore immediately available. For that reason, this personal information may not be communicated to you. However, this personal information remains subject to standard data maintenance procedures and will only be processed and retained in accordance with those procedures.

2.2. Correct/restrict/delete your personal information

If you believe that certain personal information we hold about you is inaccurate or out of date, you can look for the information to be corrected at any time using the channels outlined in [Section 2.6] below after we have verified the information. If you dispute the accuracy of information held, you can request that we restrict processing this information while your complaint is being examined. If you feel that we are processing certain information without a legitimate reason or that we are no longer entitled to use your personal information, you can also ask for that personal information to be deleted.

We are not under an obligation to rectify or delete your personal information where to do so would:

- prevent us from meeting our contractual obligations to you or
- where KBC is required or permitted to process your personal information for legal purposes or otherwise in accordance with our legal obligations.

We ask that you keep us informed of any relevant change in your personal circumstances to enable us to keep the information on our systems up to date and accurate.

2.3. Withdraw your consent

Whenever you have provided us with your consent to process your personal information, for example, so that we can contact you about one of our products or services, you have the right to withdraw that consent at any time through one of the channels identified at [Section 2.6] below. If you withdraw consent to processing (and if there is no other justification for continuing to process your information), you are also entitled to request that your personal information is deleted. Withdrawing consent does not affect the lawfulness of any processing undertaken by us based on your consent before its withdrawal.

2.4. Object to your personal information being used for certain purposes

If you disagree with the way in which KBC processes certain information based on its legitimate interest (see [Section 3.3] for further details and examples), you can object to this through one of the channels identified at [Section 2.6] below. In such cases we will provide you with details regarding the rationale for processing your personal information and we will stop processing the personal information under dispute if we cannot legitimately justify the reasons for processing within the agreed timeframe.

Some bank operations are fully automated, with no human intervention and may include taking decisions based solely on automated processing. For more details on how KBC uses automated decision making see [Section 6] below. If you disagree with the outcome of a fully automated decision making process, you can speak to a KBC staff member to express your point of view and contest the decision using one of the contact channels identified at [Section 2.6] below.

2.5. Request your personal information to be transferred in electronic form

You can (in certain cases) request that your personal information is transferred electronically to you or to another service provider so that you can store and reuse your personal information for your own purposes across different services. We will not be in any way accountable or liable for any damage, loss or distress sustained, incurred or suffered by you and/or the designated service provider as a result of improper use of the personal information upon and after receipt from us.

2.6. How to exercise your rights

You can exercise the rights outlined above free of charge by contacting us using any of the channels below:-

By dropping in to or calling your nearest KBC Hub.

By contacting one of our Customer Service Representatives by phone on 1800 93 92 44 or by email at customerservices@kbc.ie

We recommend that you provide as much detail as possible in your correspondence with us so that we can deal with your query promptly and efficiently. You may be asked to provide proof of identification and/ or additional information in order to validate your identity when making such a request.

3. Why does KBC collect and use your personal information?

We gather and process your personal information for a variety of reasons and rely on a number of different lawful purposes to use that information, for example, we use your personal information to process your applications, to help administer your products and services, to ensure we provide you with the best service possible, to prevent unauthorised access to your accounts and to meet our legal and regulatory obligations.

3.1. To comply with legal obligations

We are required to process your personal information to comply with certain legal obligations, for example:-

3.1.1. to report and respond to queries and lawful requests raised by regulatory authorities, law enforcement and other government agencies such as the Central Bank of Ireland, the European Central Bank, the Competition and Consumer Protection Commission and An Garda Síochána.

3.1.2. to respond to requests from Irish Revenue in accordance with relevant tax legislation including queries relating to Deposit Interest Retention Tax (DIRT), Foreign Account Tax Compliance Act (FATCA), stamp duty and Common Reporting Standard (CRS) and under Notices of Attachment issued by Irish Revenue;

3.1.3. to verify the personal information provided to us and meet our legal and compliance obligations, including to prevent money laundering, tax avoidance, financing of terrorism and fraud. For example, we are required to identify you, verify your identity, check your activity and transactions and ascertain your money laundering risk profile;

3.1.4. to pass details of the originator or the payee to the receiving or transferring financial institution;

3.1.5. to supply information to the Central Credit Register and to use the Central Credit Register when considering loan applications to determine your borrowing options and repayment capacity and/or facilitate other lending institutions to carry out similar checks. KBC will continue to exchange information such as your loan balance, the term of your loan and any arrears or default in making payments on that loan, with the Central Credit Register throughout your time as a customer of KBC. The information held about you on the Central Credit Register's database may be accessed by other organisations who may choose to use it to make credit decisions about you. The Central Credit Register retains this information on its database for a period of 5 years after your agreement with KBC ends;

3.1.6. to gather information about our customers' knowledge and experience, financial capacity, investment objectives and attitude to risk/return in relation to the products offered prior to giving investment advice to those customers;

3.1.7. to meet regulatory information security & incident reporting requirements such as under the Directive on Security of Network and Information Systems (NIS Directive);

3.1.8. to cooperate and provide information requested as part of legal or regulatory investigations or proceedings and to comply with orders made in the context of civil or criminal proceedings;

3.1.9. to investigate allegations of fraud and prevent fraud by third parties or customers including to meet our fraud prevention obligations under the Payment Services Regulations;

3.1.10. to respond to requests we receive from authorised third party providers (also known as TPPs) to access your account information where you have provided consent to those parties to provide account information or payment services. We are not responsible for the TPP's use of your account information. In this regard, you should review a copy of the data protection notice of any TPP you contract with; and

3.1.11. to supply information to the Irish Credit Bureau (ICB) and to use the ICB database when considering loan applications and throughout your time as a KBC customer to determine your borrowing options and repayment capacity. You can find further information on the ICB at <http://www.icb.ie/pdf/Fair%20Processing%20Notice.pdf>

3.2. To enter into and perform a contract for a product or service

3.2.1. Before KBC provides you with products or services, we have to gather some personal information to process your application and to assess the terms upon which we can enter into the contract with you. This includes, for instance, gathering and processing personal information for a loan application.

3.2.2. In order to open and manage your account(s), policies or other banking products or services and to maintain our relationship with you, we have to process your personal information. Examples of processing include the administration of accounts, payments, deposits, lending, credit decisions (including use of automated credit decision making processes, where appropriate). As part of this process, we may be required to pass some personal information to an intermediary or counterparty (e.g. if you perform a payment transaction, we pass information on the progress of the transaction to the payee concerned).

3.2.3. In addition, KBC provides insurance services acting as an insurance intermediary, which means we are required to provide your personal information to our insurance partners Zurich Insurance plc and Irish Life Assurance plc in connection with the provision and administration of insurance products and related

services. This type of information will only be obtained and processed where necessary to process your application, administer your account, investigate claims or to comply with a legal obligation.

3.2.4. For our investment products, we also use a trusted third party service provider as well as KBC Securities NV to administer trades for investments products which means that we may share your personal information with the service provider to facilitate these transactions or to comply with a legal obligation.

3.2.5. KBC works closely with KBC Life and Pensions to offer you pension products, to provide quotes for those products and to help KBC Life and Pensions manage and administer your pension products.

3.2.6. We gather and use account information from your accounts held with other banking service providers to respond to your requests for payment initiation services (which allows a third party to give us instructions to make payments from your account on your behalf) and account information services (which allows you to access your accounts with different providers in one location).

3.3. To enable KBC to function as a business

3.3.1. In certain circumstances, we process your personal information on the basis of the legitimate interests of KBC. In doing so, we ensure that the impact of the processing on your privacy is minimised and that there is a fair balance between the legitimate interests of KBC and your privacy rights. If you disagree with your information being processed in this manner, you are entitled to exercise your right to object. Examples of situations in which your personal information is processed based on our legitimate interests, include:

- to enable us to manage, on a holistic basis, our relationship with you by maintaining a single view of your accounts and any products or services that we provide to you and any interaction with us. This enables us to create a profile for you and to assess your needs better;
- to carry out statistical analysis, market research and to develop predictive and analytical models for different purposes including risk analysis, process improvements, marketing and fraud analysis. By combining information available to us from different sources such as transaction information and publicly available data (for example, the Central Statistics Office, the Property Price Register) to develop analytical models KBC can obtain data-driven insights which help to make strategic choices about the functioning of the bank, our relationship with you as our customer and the products and services which we believe will be of interest to you;
- to submit claims and/or otherwise exercise rights under insurance policies entered into in favour of KBC and to provide updates to insurers on an ongoing basis in connection with those policies;
- to investigate complaints and establish, exercise and safeguard our rights under any agreement with you, including where necessary to engage tracing agencies, to consult professional advisors authorised to act on behalf of KBC, to take enforcement action (e.g. debt collection) and to respond to claims made against KBC;
- to undertake system testing to guarantee software code quality, in particular;
 - to test software code changes;
 - to validate the stability of software changes and accept the software code changes and;
 - to run technical tests, like performance, resilience, operational proving testing;
- to create efficiencies in bank processes for KBC and for our customers, to measure our performance and to deliver other organisational benefits;
- to ensure appropriate information security and fraud prevention protections are in place and to safeguard customer accounts; and
- to provide aggregated reports to departments inside KBC, to the KBC Group (more details on sharing personal information with KBC Group are contained in Section 7.1.2) or to other third parties such as

the Central Bank of Ireland. These reports contain grouped information, such as the average number of current accounts held by people in a particular county. No individual information is shared as part of these reports. Aside from these aggregated reports, we also use more detailed reports internally within KBC which contain personal information dealing with customer applications for products and services in order to help us effectively manage our workflow of applications and customer requests.

3.4. Where you have provided consent

3.4.1. Marketing Consent: We use your personal information to make you aware of products and services which may be of interest to you. If you take a look at [Section 5] below, you can find out more about how we would like to provide you with customised offers and personalised customer service. To be able to do this, we will ask you for your consent. You can at any time withdraw that consent through the contact channels set out in [Section 2.6] above. Alternatively, you can review and make changes to your marketing preferences through KBC Mobile Banking or Online Banking channels and more details regarding these options are set out in [Section 5] below.

3.4.2. Biometric Consent: We can use image recognition software to verify your ID when you are looking to open an account through the KBC Mobile Banking App and on KBC.ie. This involves us using optical character technology to extract relevant information from your ID documents. In such cases, we will ask you for consent to process this biometric data. An alternative channel will be made available to you should you choose not to give your consent. We will only use your biometric data to fulfill this request. Depending on your device, you may choose to enable Touch ID within the KBC Mobile Banking App. Depending on your device, you may wish to choose to enable fingerprint or facial recognition technology within the KBC Mobile Banking App. KBC does not store or otherwise use this technology for any purpose.

3.4.3. Sensitive Information Consent:- We sometimes collect and process information on your health and other sensitive information (also known as special categories of information) which you share with us while applying for a product or service or when requesting a change to an existing product and service (for example, to apply for or get quotations for pension products).

3.4.4. Geolocation Consent: If you choose to use the KBC Hub Locator service, you will be asked to consent to the use of your geolocation information to find the KBC Hub nearest to you. In order to offer you this service, we use in device location services. Your geolocation information will only be used on a once off basis to indicate the KBC Hub nearest to you. This information will not be used for any other purpose.

3.5. To protect the vital interests of you or others

3.5.1. In limited circumstances, we may use and/or share your personal information, including sensitive information, with a third party (such as a family member or An Garda Síochána) to protect your safety or the safety of others.

4. What kind of personal information does KBC collect and how it is used?

The information we hold about you can vary depending on the products and services you use. This includes personal information which you give to us when you are looking for a quote for a product or service, personal information we collect automatically, for instance, your IP address and the date and time you accessed our services when you visit our websites or apps; and personal information we receive from other sources like credit referencing agencies. We may also collect your personal information from other banks and financial institutions (for example, when you have requested us to display those accounts on our mobile or online platforms).

Here is a more detailed look at the information we hold about you and how it is used by us:

TYPES OF INFORMATION

EXAMPLES OF HOW THE INFORMATION IS USED BY KBC

Identity information

Name, sex, date of birth, nationality, address, PPSN, driving licence, passport, a self-portrait picture (or 'selfie') uploaded to the KBC Mobile Banking App.

We use this type of information to identify you and to help us combat fraud and other illegal activity.

Contact Information

Telephone number, e-mail address.

Technical information such as an IP address, unique identifier for your device.

Your contact information is needed to manage and administer your accounts, products or services; to send you service, support and administrative messages, reminders, technical notices, updates, security alerts and information requested by you; and to notify you about either important changes or developments to the features and operation of those products and services. We also use this information to respond to your enquiries and complaints.

Information to help us service your needs

Your client profile includes:

- Your account numbers
- Details of the KBC products you hold
- Key relationships, civil status and household composition
- Your overall financial situation
- Your preferences and interests
- Your education, professional experience
- Your lifestyle, interests and activities (memberships, etc.)
- Webchats and the results of surveys you have completed.
- Your Risk Appetite

Based on a review of the information contained in your client profile, we can, for example, effectively analyse which product or service might work best for you or which products you may need and offer these products to you. We also use your risk appetite to help us determine the suitability of products for investments.

If you provide information about other people (such as your spouse, dependents, employees, directors or business partners) or if you ask us to share their personal information with a third party, you should ensure that those people have agreed to us using this information or that you are otherwise allowed to give us this information.

The activity and balance on your accounts, including your transactions, your salary and other income and expenditure.

These details can be used for a variety of purposes including to prevent or detect money laundering, to identify particular needs or usage patterns based on your transaction details, which when used in conjunction with your marketing preferences, can assist us to provide you with a better, personalised service.

Financial information (such as transaction details, bank card details) from your KBC accounts can be used to respond to a request for a payment initiation service or an account information service provided by an authorised third party provider.

TYPES OF INFORMATION	EXAMPLES OF HOW THE INFORMATION IS USED BY KBC
Information gathered from simulations, applications, competition entries etc.	When you look for a quote, enter a competition or fill out an application with us, the personal information which you provide is processed and assessed by us to fulfill that purpose. That information will also be stored and used to pre-populate the form if you are interrupted during the process and/or wish to start again at a later point. We may also contact you where your application is incomplete or interrupted to support you to complete that application or to answer any queries you may have.
Interactions with KBC staff in a KBC Hub, by phone, email or through our digital channels.	Whenever a KBC staff member meets with you or contacts you this interaction is logged to retain a note of the interaction so that staff can deal with your queries and satisfy your requests. KBC may record phone conversations with you to train staff, improve security, resolve complaints and to improve our services generally. You will always be informed when calls with our staff members are being recorded.
Significant life events like moving house, birthdays etc.	We may use these life events to determine which services or products are most relevant to you.
Information on your physical or mental health.	We sometimes collect and process information on your health which you share with us while applying for a product or service or when requesting a change to an existing product and service. See [Section 3.4.3] to read more on how we process your sensitive information.
Your comments and suggestions, past complaints.	We collect this information to analyse, assess and improve our services to customers, and also for training and quality control purposes. For example, we may monitor or record any communications between you and us including telephone calls.
Financial Information from other banking service providers	
Account information such as sort code, account number, account name, balances, card number and transaction history.	If requested by you, we can display your financial information from other banks within the KBC mobile and online platforms.

TYPES OF INFORMATION

EXAMPLES OF HOW THE INFORMATION IS USED BY KBC

Information made available by another party or in a public domain

Publicly available information including information on your social media profile where it is publicly accessible.

Information about you which is obtained from other parties, for example, joint account holders or people appointed to act on your behalf.

Information obtained through agreements with third parties, for example, credit reference agencies, fraud prevention agencies or commercial entities such as An Post or Experian. These companies are responsible for gathering and maintaining that information lawfully.

We sometimes use this type of information to verify that the information we hold on our databases is correct.

We also use this information to help us understand our relationship with you and to help us to offer you products and services we believe will be of interest to you.

Information about your location

Location details from your mobile or other devices, including specific geographic locations through the use of GPS, Bluetooth, or WiFi signals, when you install or access our products or services and when location-based products or features are enabled.

If you choose to use the KBC Hub finder service, you will be asked to consent to the use of your geolocation data to find the KBC Hub nearest to you. We may also use your location information to develop anonymised analytical models to improve our products and services. The analysis is never personal and you will never be identifiable.

Images from security cameras in and around the KBC Hubs and office premises.

We may use CCTV to monitor and collect images. We have a strict retention period for security cameras images but in certain limited circumstances, the recordings may be kept for longer, for instance, to provide evidence to the Gardai for investigations for fraud purposes or criminal proceedings.

Cookies

KBC uses "cookie" technology on our website and mobile app.

Cookies are small pieces of information, held in simple text files, stored on your computer or mobile device when you visit a website or use a mobile app.

We use cookies for a number of purposes like letting you navigate between pages efficiently, remembering your preferences and generally improving your online experience. Cookies can also be used to help ensure that the ads you see online are more relevant to you and your interests.

The KBC Privacy Statement for Online Media and Mobile Banking gives you more information on this technology, how and where we use them and how you can control them.

5.

How does KBC use personal information for direct marketing?

We would like to make you aware of products and services provided by us, other KBC Group entities or our insurance partners, which may be of interest to you. We can do this by using some of the personal information we hold about you to better understand your needs. For example:

Based on your demographic or other personal information we may offer you products or services which are widely used by others in the same demographic group.

You can review and make changes to your marketing preferences at any time through the following options:

- via the customer contact channels outlined in [Section 1.2] above;
 - via the 'My details' section of the KBC Mobile Banking App. Simply click on the 'Stay Connected' box on the bottom of your screen to access the 'My details' section; or
 - via the 'Personal Details' section of KBC Online Banking.
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6.

How does KBC make use of Automated Decision Making?

We use automated decision making to enable us to deliver decisions within a shorter time frame and to improve the efficiency of our processes. Some KBC bank operations are fully automated, with no human intervention and may include taking decisions based solely on automated processing. If you disagree with the outcome of a fully automated decision making process, you can speak to a KBC staff member to express your point of view and contest the decision using the customer contact channels outlined in [Section 1.2] of this Data Protection Notice.

6.1. An example of where we use automated decision making is as part of our credit decision process, which involves assessing your application for credit, taking account of your current circumstances and evaluating your ability to meet the required repayments.

The decision process takes into account different types of information, for example:

- Information you have provided in your application such as the amount requested, the repayment period, the type of facility, your income, employment details, etc.;
- Your credit history with credit reference agencies such as the Central Credit Register; and
- Details of other credit facilities you may have (with KBC or other financial institutions) such as loans, overdrafts, credit cards, etc.

KBC uses this information to apply internal credit assessment rules in a consistent manner. This ensures that your application for credit is treated fairly, efficiently and that we believe you can afford the required repayments. KBC reviews the automated credit decision making process on an ongoing basis to ensure that it remains fair, efficient and unbiased in order to better serve our customers. To ensure that our systems remain secure and to protect our commercial interests, we need to keep the finer details of how we apply the KBC credit assessment rules confidential.

7.

What about Security and Confidentiality?

KBC uses a variety of security technologies and procedures to help protect your personal information from unauthorised access, use or disclosure. We also take steps to ensure that only persons with appropriate authorisation can access your personal information.

7.1. Who can access your personal information within KBC and the KBC Group

7.1.1. Only staff members who are suitably authorised can access your personal information if that information is relevant to the performance of their duties, whether it be in connection with the delivery of products or services or in accordance with legal or regulatory obligations. This may include, for example, staff members working in our Credit Department, Marketing Department, in any of the KBC Hubs or customer services representatives you have dealings with.

7.1.2. As a member of the KBC Group, KBC sometimes shares personal information relating to its customers with other members of the KBC Group for a variety of reasons, for example, to provide you with products and services, for marketing purposes, for internal reporting and where those companies provide services to us. By way of illustration we use the services of the KBC Shared Services Centre, a Czech branch of the KBC Group, for financial reporting and information technology support services; we use the services of KBC Securities NV, a KBC Group entity located in Belgium, to administer trades for our investment products.

7.1.3. We also provide services to support KBC Life and Pensions to offer and manage its pension products available to KBC customers. If you take out a pension product through us, we will share your personal information with KBC Life and Pensions. Details about how KBC Life and Pensions can use your data (including any personal information you provide to them) are contained in the KBC Life and Pensions Data Protection Notice, which will be made available to you before you take out the pension product.

7.2. Security measures to safeguard your personal information

We use internal technical and organisational measures to protect your personal information from unauthorised access, to maintain data accuracy and to help ensure the appropriate use of your personal information. These security measures include encryption of your personal information, firewalls, intrusion detection systems, 24/7 physical protection of facilities where your personal information is stored, background checks for personnel that access physical facilities, and strong security procedures across all service operations. We use strong encryption algorithms for the transmission and storage of your information. Further information regarding these security measures as well as steps you can take to protect your computer is contained in the Security and Fraud Awareness section of the KBC.ie website which is accessible at <https://www.kbc.ie/security>.

7.3. Other restrictions on use of your personal information

KBC does not collect personal information on children aged under 16, unless a parent or legal guardian has given his/her consent for this. KBC will not sell or hire your personal information to third parties for their own use.

8.

Who does KBC share your personal information with?

KBC sometimes shares your personal information with trusted third parties who perform important functions for us based on our instructions and applying appropriate confidentiality and security measures. For example, we use third party service providers to send out marketing material on a product or service you may be interested in. We also use third parties to help us detect, prevent, or otherwise address fraud, security or technical issues. We go into more detail below about the reasons we share personal information with third parties.

8.1. We have set out below some examples of where KBC shares your personal information:

- We work with providers of payment-processing services and other businesses such as the Belgium based Society for Worldwide Interbank Financial Telecommunications (SWIFT) to help us process your payment, as well as other financial institutions that are members of the payment schemes (for example, MasterCard);
- We engage the services of our insurance partners, Zurich Insurance plc and Irish Life Assurance plc., to provide and administer insurance and investment products and related services;
- When you apply for a product or service with us and throughout your time as a customer of KBC, we engage the services of specialist third party providers to provide the IT infrastructure and application used on the KBC Mobile Banking App to administer the purchase and sale of investment products;
- We undertake credit checks and report to credit reference agencies such as the Central Credit Register and the Irish Credit Bureau. Through these agencies we can check your credit history and debts. We also provide them with details regarding the products and services you have with us and we update them about your repayment record;
- We use printing and distribution agencies to communicate with you about our products and services;
- We undertake market research in conjunction with agencies such as Ipsos, Core Research and Kantar;
- We engage the services of solicitors, accountants, auditors, valuers, debt collection agencies and other consultants to act on our behalf;
- We work with advisors you have instructed to represent you, or any other person you have informed us is authorised to give instructions or to use the account or services on your behalf (such as under a power of attorney). In circumstances where a third party (individual or legal entity) guarantees or indemnifies your obligations to us, we may share relevant personal information relating to the account with that party;
- We work with certain relationship partners and agents, such as our approved panel of brokers, under a strict code of confidentiality;
- We are required to cooperate by law or otherwise through a legal process with Irish and EU regulatory and enforcement bodies such as the Central Bank of Ireland, an Garda Síochána, the courts, fraud prevention agencies or other bodies. We are also required to report personal and account information to Irish Revenue for interest reporting, CRS and FATCA purposes;
- We use the services of innovative and artificial intelligence led document recognition and interrogation services providers, such as ID Scan and Data Ireland to identify you for anti-money laundering purposes. We also use third parties for document extraction services for the KBC Mobile Banking App and on some KBC.ie applications to present customers with a quick and efficient method of completing part of an application form by extracting that information directly from identification documents;
- We work with companies that support KBC to identify and analyse your user behaviour in our app and on our website, for example, Google Analytics;
- We use specialist third parties such as LivePerson and Booking Bug to provide real-time customer engagement and appointment scheduling solutions on the KBC website;
- We engage the services of ICT and information security service providers, such as Microsoft and IBM;
- We work with funding companies such as the Strategic Banking Corporation of Ireland (SBCI);
- We may share certain information about your account (e.g. account balance, transaction details) with

third party providers (TPPs) where you have provided consent to those parties to provide you with account information or payment services.

8.1.1. We sometimes need to share information with organisations which are located or who otherwise undertake processing outside the EEA. This may mean, for example, that some of your personal information may be processed in countries such as India, Malaysia or the United States. We will however only transfer personal information to a country or territory outside of the EEA if:

- that country provides an adequate level of protection for personal information as set down by the European Commission; or
- the transfer is made under a legally binding agreement which covers the EU requirements for the transfer of personal information to data processors outside of the EEA such as the model contractual clauses approved by the European Commission; or
- Binding Corporate Rules or BCRs (a copy of the BCRs of Mastercard are available on request); or the EU-US Privacy Shield or an equivalent framework; or
- such other approved mechanism or model approved by the European Commission

In the event that the United Kingdom exits the European Union (Brexit), KBC will ensure that one or more of the protections outlined in this Section 8.1.1. shall apply to any such transfers from the EEA to the United Kingdom. For more information about the European Commission's decisions on the adequacy of the protection of personal information in countries outside the EEA, please visit:

https://ec.europa.eu/info/law/law-topic/data-protection_en

8.1.2. We may disclose personal information relating to our customers to any third party in the event of a sale, transfer, assignment, disposal (or potential sale, transfer, assignment or disposal), merger, liquidation, receivership, of all, or substantially all or any part of the assets of KBC. We may use your personal information to facilitate a potential or actual transfer of any loan or product provided to you or in connection with a securitisation or other funding arrangement

9.

How long will KBC retain your Personal Information?

How long certain personal information is stored depends on the nature of the information we hold and the purposes for which they are processed. KBC determines appropriate retention periods having regard to any statutory obligations imposed on us by law. For example, we are required to retain some customer information for 6 years after the end of the customer relationship in accordance the Consumer Protection Code and also to meet our obligations under anti-money laundering legislation. If the purpose for which the information was obtained has ceased and the personal information is no longer required, the personal information will be deleted or anonymised which means that your personal information is stripped of all possible identifying characteristics. KBC has put in place procedures to ensure that files are regularly purged and that personal information is not retained any longer than is necessary.

10.

Updates to our Data Protection Notice

We keep this notice under regular review and from time to time will look to amend it to reflect changes to the way in which we are processing personal information. The most recent version will always be available at www.kbc.ie/data-protection. We will inform you of material changes to the content of the Data Protection Notice through a notification posted on our website, KBC Mobile Banking App or other communication channels. You will also find more information about Irish and European data protection legislation on the Office of the Data Protection Commissioner's website at <https://dataprotection.ie/docs/Home/4.html>

THE BANK OF YOU

 Drop in  1800 93 92 44  [kbc.ie](https://www.kbc.ie)

KBC Bank Ireland plc is regulated by the Central Bank of Ireland.

KBC/2849-5 (11.19)