

Strictly Confidential



KBC Bank NV

Dublin Branch Data

Protection Notice

**This Data Protection Notice is effective as and from 1st
December 2023.**

KBC Bank NV Dublin Branch Sandwith Street Dublin 2 Ireland
Tel: +353 1 961 9800 Website: www.kbc.ie

Data Protection Notice

Data Protection is the safeguarding of the privacy rights of individuals in relation to the processing of personal information, in both paper and electronic format.

KBC Data Protection Notice

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” or “we” to refer collectively to Exicon DAC (formerly trading as KBC Bank Ireland plc) (which is a controller of personal data relating to banking products), its subsidiaries, KBC Insurance NV (Irish Branch), (formerly trading as KBC Life and Pensions) (which is a controller of personal data relating to life assurance and pension products) and KBC Bank NV, Dublin Branch.

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1.

Introduction

1.1. KBC and KBC Group

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.

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In 2021, KBC Group made the strategic decision whereby The Governor and Company of the Bank of Ireland would acquire substantially all of KBC Bank Ireland's performing loan assets and deposits from KBC Bank Ireland plc. In addition, a small portfolio of non-performing loans were sold to Cabot Financial.

In May 2023, KBC Life and Pensions completed the portfolio transfer of all customers' PRSA funds to New Ireland Assurance Company plc, trading as Bank of Ireland Life. In May 2023, KBC Life and Pensions completed the portfolio transfer of all customers' PRSA funds to New Ireland Assurance Company plc. Following completion of this portfolio transfer, no open KBC Life and Pensions' policies with customers remained in place.

In Ireland, KBC Bank NV carries on a banking business through its Irish branch (which is registered with the Central Bank of Ireland as "KBC Bank NV Dublin Branch").

On 1st December 2023 KBC Bank Ireland plc and KBC Bank NV (KBC Bank Ireland's Belgian parent company), acting through its branch in Ireland, agreed that KBC Bank NV would acquire certain remaining rights, obligations, assets and liabilities of KBC Bank Ireland plc including all associated records.

More information on the activities of KBC Bank NV and the KBC Group is available at www.kbc.be.

KBC Bank NV is a limited liability company incorporated under the law of Belgium and having its registered office at Havenlaan 2, 1080 Brussels, Belgium, VAT BE 0462 920 226.

KBC Bank NV's Irish branch is registered with the Irish Companies Registration Office under Part 21 of the Companies Act 2014 with registration number 904213 and a registered office at Sandwith Street, Dublin 2, Ireland.

1.2. How you can contact KBC

If you have any questions about your privacy rights or how KBC processes personal data, you can contact us in the following ways:

- By contacting one of our Customer Service Representatives by phone on 01 961 9800 or by email at customerenquiries@kbc.com
- 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 kbcdcompliance@kbc.com or, by writing to the Data Protection Officer, KBC Bank NV Dublin Branch, 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 Commissioner
21 Fitzwilliam Square North
Dublin 2
D02 RD28

Phone: + 353 57 868 4800
Email: info@dataprotection.ie

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

2.

How can you control the personal information you have given to KBC?

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. 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 www.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 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.

2.3. Withdraw your consent

Whenever you have provided us with your consent to process your personal information, you have the right to withdraw that consent at any time through one of the channels identified at Section 2.6 below. 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 raise an objection to this through one of the channels identified at Section 2.6 below. In such cases we will consider your personal objection in light of our or a relevant third party's legitimate interest and we will stop processing the personal information under dispute, if we cannot legitimately justify the reasons for the continued processing of your personal information having regard to your personal objection.

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

You can (in certain cases) request that your personal information is transferred to you electronically 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 contacting one of our Customer Service Representatives by phone on 01 961 9800 or by email at customerenquiries@kbc.com
- Complete the Access Request Form available on our website and return it to rightsmanagement@kbc.com

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, previously we used 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, investigations and lawful requests raised by regulatory authorities, law enforcement and other government agencies such as the Central Bank of Ireland, the Competition and Consumer Protection Commission, the Data Protection Commission, the Financial Services and Pensions Ombudsman, the Pension Authority, the Companies Registration Office, the Corporate Enforcement Authority, An Garda Síochána, the European Central Bank and National Bank of Belgium.
- 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.
- 3.1.4.** to supply information to the Central Credit Register and to use the Central Credit Register when considering 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.

3.1.5. 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;

3.1.6. to meet regulatory information security & incident reporting requirements such as under applicable law including but not limited to the Directive on Security of Network and Information Systems (NIS Directive);

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

3.1.8. 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.

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

3.2.1. Before KBC provides banking services, we have to gather some personal information to process an application and to assess the terms upon which we can enter into the contract with you. This includes, for instance, the onboarding of KBC clients onto KBC banking systems.

3.2.2. In order to open and manage your account(s), 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.

3.2.3. 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.

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 the relevant KBC Group entity or that of a third party. 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 on personal grounds. 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.
- to carry out statistical analysis, market research and to develop predictive and analytical models for different purposes including risk analysis, process improvements and fraud analysis.
- 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, 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:
- 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 utilise KBC Group for a variety of services, for example, compliance and internal audit purposes, for internal reporting and ICT management.
- 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) or to other third parties such as the Central Bank of Ireland.

3.4. Where you have provided consent

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 or when requesting a change to an existing product and service.

3.5. To protect the vital interests of you or others

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.

3.6. Where you have provided third party information

If you provide information in relation to 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. Please share a copy of this Data Protection Notice with them.

3.7. CCTV Recordings

We may use CCTV to monitor and collect images from security cameras in and around the KBC office premises. 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.

3.8. Cookies

KBC uses “cookie” technology on our website. 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. Please see www.KBC.be for up to date information regarding Cookies.

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 have provided to us during the banking or insurance relationship, personal information we collect automatically, for instance, your IP address and the date and time you accessed our services when you visit our websites and personal information we receive from other sources like credit referencing agencies.

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

TYPES OF INFORMATION	WHY YOUR INFORMATION IS USED BY KBC
Identity Information	
Name, sex, date of birth, nationality, address, PPS Number, driving licence, passport, nationality.	3.1 To comply with legal obligations 3.2 To enter into and perform a contract for a product or service 3.3 To enable KBC to function as a business
Contact Information	
Telephone number, e-mail address. Technical information such as an IP address, unique identifier for your device.	3.1 To comply with legal obligations 3.2 To enter into and perform a contract for a product or service 3.3 To enable KBC to function as a business
Information to help us service your needs	

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<p>Your client profile includes:</p> <ul style="list-style-type: none"> • Account numbers • Details of the KBC products you hold • Key relationships, civil status and household composition • Activity and balance on your accounts • Preferences and interests • Education, professional experience • Tax residency and tax related information • Lifestyle, interests and activities (memberships, etc.) 	<p>3.1 To comply with legal obligations</p> <p>3.2 To enter into and perform a contract for a product or service</p> <p>3.3 To enable KBC to function as a business</p>
<p>Interactions with KBC staff by phone and email</p>	<p>3.1 To comply with legal obligations</p> <p>3.2 To enter into and perform a contract for a product or service</p> <p>3.3 To enable KBC to function as a business</p>
<p>Comments and suggestions, past complaints</p>	<p>3.1 To comply with legal obligations</p> <p>3.2 To enter into and perform a contract for a product or service</p> <p>3.3 To enable KBC to function as a business</p>
<p>TYPES OF INFORMATION WHY YOUR INFORMATION IS USED BY KBC</p>	
<p>Information made available by another party or in a public domain</p>	
<p>Publicly available information about you which is obtained from other parties, for example, colleagues or people appointed to act on your behalf. Information obtained through agreements with third parties, for example, credit reference agencies, fraud prevention agencies, the Companies Registration Office or commercial entities such as Vision Net (Director Searches). These companies are responsible for gathering and maintaining that information lawfully.</p>	<p>3.1 To comply with legal obligations</p> <p>3.2 To enter into and perform a contract for a product or service</p> <p>3.3 To enable KBC to function as a business</p>
<p>CCTV Recordings</p>	<p>3.1 To comply with legal obligations</p> <p>3.7 CCTV Recordings</p>
<p>Cookies</p>	

Cookies and similar tracking technology	3.1 To comply with legal obligations 3.3 To enable KBC to function as a business 3.8 Cookies
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5.

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 2.6 of this Data Protection Notice.

An example of this is where we use your personal information to help decide if your accounts or facility may be being used for fraud and for anti-money laundering and sanctions checks.

6.

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.

6.1. Who can access your personal information within KBC and KBC Group

6.1.1. 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.

6.1.2. 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 compliance and internal audit purposes, for internal reporting and where those companies provide services to us. For ICT management, KBC uses KBC Global Services NV, sometimes in conjunction with other processors within and outside the KBC Group.

6.2. 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.

6.3. 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.

7.

Who do we 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 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.

7.1. 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 payments as well as other financial institutions that are members of the payment schemes.
- We engage the services of specialist third party providers to provide the IT infrastructure and application used on the KBC website.
- We undertake credit checks and report to credit reference agencies such as the Central Credit Register. 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 engage the services of solicitors, accountants, auditors, valuers, debt collection agencies, tracing agents 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 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, Financial Services and Pensions Ombudsman, Data Protection Commission, 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 engage the services of ICT and information security service providers, such as Oracle, Redhat, Digiwell, Ward Solutions, Microsoft and IBM.

7.1.1. 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 or the United States. We will however only transfer personal information to a country or territory outside of the EEA if:

1. that country provides an adequate level of protection for personal information as set down by the European Commission; or

2. the transfer is made under a legally binding agreement which covers the EU requirements for the transfer of personal information to organisations outside of the EEA such as the model contractual clauses (also known as Standard Contractual Clauses) approved by the European Commission; or
3. Binding Corporate Rules or BCRs or an equivalent framework; or
4. such other approved mechanism or model approved by the European Commission.

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

7.1.2. 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.

8.

How long will we 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, including to provide our services and for other purposes such as:

- complying with legal obligations (for example, we are required to retain some customer information for a minimum of 6 years after the end of the customer relationship in accordance with the Central Bank of Ireland's Consumer Protection Code or under anti-money laundering legislation);
- complying with retention obligations under legal or regulatory orders;
- to protect, enforce or defend our rights and property;
- to support operational retention needs (including to support the phased migration of data from KBC Bank Ireland plc to KBC Bank NV (acting through its branch in Ireland) [or other third party acquirer notified to you] and the operational wind-down of KBC Bank Ireland plc systems);
- to the extent necessary to protect the integrity of our IT systems and the data stored on those systems where a phased data erasure process is not feasible from a technical or operational perspective in which case all data stored on the relevant KBC system will be deleted once the last retention period for any data stored on that system has expired.

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 identifying characteristics or where it is required to be obtained for an additional period for operational reasons, security measures will be applied to prevent any further use of your personal information by the KBC Group other than its storage in a secure manner following which it will be deleted as explained above.

9.

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 on our website. You will also find more information about Irish and European data protection legislation on the Data Protection

Commission's website at www.dataprotection.ie

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