

**Privacy statement  
for  
ING applicants**  
(V2.0)

Contents

- 1. Purpose and scope of this privacy statement..... 3
- 2. The types of personal data we process..... 3
- 3. What we do with your personal data ..... 5
- 4. Who we share your data with and why..... 6
- 5. Your rights and how we respect them..... 7
- 6. Your duty to provide data..... 9
- 7. How we protect your personal data..... 9
- 8. Changes to this privacy statement ..... 10
- 9. Contact and questions ..... 10

ING Bank N.V. is a European financial institution and is subject to the data protection obligations set out in the EU General Data Protection Regulation 2016/679 (GDPR). To comply with GDPR, we have implemented data protection principles on a global scale, through our Global Data Protection Policy (GDPP). The GDPP is binding on all ING entities, subsidiaries, branches, representative offices, and affiliates worldwide and approved by the EU data protection authorities. Therefore, in addition to local privacy laws and regulations, we have resolved that all its entities, subsidiaries, branches, representative offices, and affiliates worldwide will comply with GDPP, regardless of geographical location of job applicants.

This is the privacy statement for applicants of ING Belgium SA/NV, ING Bank N.V. Belgian Branch and ING Lease Belgium SA ('ING', 'we', 'us' and 'our'), and it applies to us as long as we process personal data that belongs to individuals ('you').

This Privacy Statement concerns all candidates who apply for a job within one of the following legal entities:

- ING Belgium SA/NV, with registered offices at 1000 Brussel, Marnixlaan 24, with company number 0403.200.393;
- ING Bank NV Belgian Branch, with registered offices at 1000 Brussel, Marnixlaan 24, with company number 0828.223.909; and,
- ING Lease Belgium SA, with registered offices at 1000 Brussel, Marnixlaan 24, with company number 0402.918.402.

Each legal entity is data controller for the data related to an application within them.

Processing of applicants data is centralized within one sole entity, i.e. ING Belgium SA/NV that acts as “data processor” for the applicants of ING Bank NV Belgian Branch and ING Lease Belgium SA.

## 1. Purpose and scope of this privacy statement

At ING, we understand that your personal data is important to you. This privacy statement explains in a simple and transparent way what personal data we collect, record, store, use and process and how. Our approach can be summarised as: the right people use the right data for the right purpose.

This privacy statement applies to

- all job applicants ('you')

This privacy statement does not apply to

- independent contractors or anyone else hired to work at ING on anything other than on the basis of an employment contract. Please refer to the 'Privacy statement to external resources' that can be found on [ING Today](#).

We obtain your personal data in the following ways:

- You share it with us when you apply for a job or visit our websites, through personal contacts, phone calls or e-mail.
- From the person who recommended your job application.

- From other available sources such as professional registers; online (e.g.: via social media) or traditional media; publicly available sources; other ING companies; or third parties such as public authorities.

## 2. The types of personal data we process

**Personal data** refers to any information that identifies you or can be linked to a natural person. Personal data we process about you includes:

- **Identification data**, such as your name, surname, date and place of birth, ID number, passport number, other data in your ID document, driving licence, passport or other document confirming your identity, social security number, home address or place of residence, phone number and email address.
- **Personal information**, such as nationality; gender; work permits; photographs (if you decide yourself to provide us with); professional experience (profile, previous employers, termination of last employments and work carried out, including reference checks if you have provided us with references in your CV -which means that you have consented to us contacting those references- special projects, outside positions); education, professional qualifications and continuous training (diplomas, certificates, internships), language skills, digital assessment through the internet (social media presence and search engine), insofar as this presence is open for us to see;
- **Interests and needs**, for example hobbies and memberships you share with us.
- **Audio-visual data**, where it's applicable and legally allowed, we process surveillance videos of ING offices and car parks.
- Any other personal data (than mentioned above) that require processing by virtue of the law

### Sensitive data

ING does not collect or process any sensitive applicant data, such as data that reveals your race or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health or sex life. If, owing to certain circumstances, ING does collect sensitive applicant data, the applicant's explicit prior written consent will be asked. Please note that by providing ING with unsolicited sensitive applicant data, the applicant consents that ING stores this sensitive data in the recruitment file.

Because of ING's activities, you may be subject to a criminal background check. We will however only process personal data relating to criminal convictions and offences when such processing is authorised.

### 3. What we do with your personal data

Processing refers to every activity that can be carried out in connection with personal data, such as collecting, recording, storing, adjusting, organising, using, disclosing, transferring or deleting it in accordance with applicable laws.

We only use your personal data for the following business purposes:

#### **Human resources and personnel management**

The purpose for processing your personal data is to register your application for a job within ING and, if this application leads to start our selection procedure, make a profile of you, meaning that ING will process all the necessary data that is required for us to assess your job application in view of a potential recruitment.

The processing of your data is therefore necessary in order to take steps prior to entering into an employment contract and is in ING's legitimate interests, i.e. the interest to assess and evaluate you before deciding on making an offer of employment.

In case of positive evaluation and decision to hire, we will also use your personal data to prepare an employment contract.

In case of a decision not to hire you, we will retain your personal data for a period of time as well (see below) in order to be able to contact you if any future job opportunities would seem to match your profile. This is also in the legitimate interests of ING.

When processing personal data that is not compatible with one of the purposes above, we ask for your explicit consent, which you may withhold or withdraw at any time.

#### **Retention of your personal data**

We will only hold your personal data for as long as it is necessary for the purposes described above. As general rule, in case the recruitment does not result in an employment relationship, your personal data will be retained for a maximum period of two years after the end of the job application procedure for the purposes described above. When we no longer need your personal data for the process or activity we originally collected it for, we delete it, or aggregate it (bundle data at a certain abstraction level), render it anonymous and dispose of it in accordance with the applicable laws and regulations.

If the recruitment results in an employment relationship, your personal data will be retained in accordance to the retention policy for employees' personal data.

#### 4. Who we share your data with and why

We share certain data internally (with other ING businesses/departments) and externally (with third parties outside of ING).

Whenever we share personal data in countries outside of the European Economic Area (EEA) -- whether internally or with third parties - we ensure there are safeguards in place to protect it. For this purpose, we rely on (among) others:

- The conclusion or the execution of an agreement.
- Applicable local laws and regulations.
- [EU Model clauses](#), when applicable. We use standard contractual clauses in agreements with service providers to ensure personal data transferred outside of the EEA complies with EU General Data Protection Regulations (GDPR).
- Adequacy decisions by the European Commission, which establish whether a country outside of the EEA ensures personal data is adequately protected.
- Your explicit consent

##### [ING entities](#)

We transfer data across ING businesses and branches for various purposes (for example to ING Group for profiles that may imply international careers - also see section 'What we do with your personal data'). We may also transfer data to centralised storage systems or for processing centrally within ING for efficiency purposes. For all internal data transfers we rely on our GDPP and on the applicable local laws and regulations.

##### [Authorised ING employees](#)

Certain employees are authorised to process your personal data for legitimate purposes (see section 3 'What we do with your personal data'). They are only authorised to do so to the extent that is needed for that purpose and to perform their job. All employees are subject to confidentiality obligations, also according to local requirements.

##### [Government, supervisory and judicial authorities](#)

To comply with our regulatory obligations we may disclose data to the relevant government, supervisory or judicial authorities. In some cases, we are obliged by law to share your data with external parties, including:

- Public authorities, regulators and supervisory bodies such as the central banks and other financial sector supervisors in the countries where we operate.
- Tax authorities may require us to report your assets (e.g. your salary). We may process your social security number or tax identification number for this.
- Judicial/investigative authorities such as the police, public prosecutors, courts and arbitration/mediation bodies on their express and legal request.

### Service providers and other third parties

When it is required for a particular task, we may share your personal data with external service providers or other third parties such as agencies including assessment centres who carry out certain activities for ING in the normal course of our business.

Service providers support us with activities like:

- performing certain services and operations
- designing, developing and maintaining internet-based tools and applications
- IT services such as applications or infrastructure e.g. cloud services
- preparing reports and statistics, printing materials and product design
- recruitment

### Researchers

For legitimate interests, we are always looking for new insights to help you get ahead in life and in business. For this, we may exchange personal data (when it's legally allowed) with partners like universities and other independent research institutions, who use it in their research and innovation. The researchers we engage must satisfy the same strict requirements as ING employees. This personal data is shared at an aggregated level and, as far as possible, the results of the research are anonymous.

In all of these cases, we ensure the third parties can only access personal data that is necessary for their specific tasks.

## 5. Your rights and how we respect them

You have certain privacy rights when it comes to processing of your personal data. These rights may vary from jurisdiction to jurisdiction, depending on the applicable laws. If you have questions about which rights apply to you, please contact us via the contact details in chapter 9.

We respect the following rights:

### Right to access information

You have the right to ask us for an overview of your personal data that we process and/or a copy of this data.

### Right to rectification

If your personal data is incorrect, you have the right to ask us to rectify it. If we have shared data about you with a third party, we will also notify that party of any corrections made.

### Right to object to processing

You can object to us using your personal data for our own legitimate interest – if you have a justifiable reason. We will stop processing your personal data unless we have compelling legitimate grounds to do so.

You may not object to us processing your personal data if

- we are legally required to do so, or
- it is necessary for fulfilling a contract with you.

### Rights regarding the use of automated decisions

ING may use automated decision-making. If automated decisions are used, we will inform you about this. You have the right to object to such automated decisions and ask for an actual person to make the decision instead.

### Right to restrict processing

You have the right to ask us to restrict using your personal data if

- you believe the information is inaccurate
- we are processing the data unlawfully
- ING no longer needs the data, but you want us to keep it for use in a legal claim
- you have objected to us processing your data for our own legitimate interests.

### Right to data portability

You have the right to ask us to transfer your personal data directly to you or to another company. This applies to personal data we process by automated means and with your consent or on the basis of a contract with you. Where technically feasible, and based on applicable local law, we will transfer your personal data.

### Right to erasure

We are legally obliged to keep certain personal data for a specified period of time. You may ask us to erase your online personal data and the right to be forgotten is applicable if:

- we no longer need your personal data for its original purpose
- you withdraw your consent for processing it
- you object to us processing your personal data for our own legitimate interests and we find your claim to be legitimate
- we unlawfully process your personal data
- a local law requires ING to erase your personal data.

### Right to withdraw consent

You have the right to withdraw your consent to the processing or transfer of your



personal data if it is based on your consent. Note however that this will not affect the lawfulness of earlier processing activities.

### Right to complain

Should you not be satisfied with the way we have responded to your concerns, you have the right to submit a complaint to us. If you are unhappy with our reaction to your complaint, you can escalate it to your local data protection officer. You can also contact the data protection authority in your country if applicable.

### Exercising your rights

If you want to exercise your rights or submit a complaint, please contact us via the contact details under chapter 9.

If the requirements for your request (as set out in the GDPP for employees) are not fulfilled, your request may be denied. If permitted by law, we will notify you of the reason for denial.

We aim to address your request as quickly as possible. However, our response time may vary based on your location and applicable local laws. Should we require to complete your request than is legally allowed, we will notify you immediately and provide reasons for the delay.

## 6. Your duty to provide data

As your potential employer, there is certain personal information we are legally required to collect, or that we need to execute our duties and fulfil our contractual obligations. There is also information that we need for certain HR processes. We aim to only ask you for personal data that is strictly necessary for the relevant purpose. Not providing this information may mean we cannot hire you.

## 7. How we protect your personal data

We take appropriate technical and organisational measures (policies and procedures, IT security etc.) to ensure the confidentiality and integrity of your personal data and the way it's processed. We apply an internal framework of policies and minimum standards across all our business to keep your personal data safe. These policies and standards are periodically updated to remain current with regulations and market developments.

In addition, ING employees are subject to confidentiality obligations and may not disclose your personal data unlawfully or unnecessarily. To help us continue to protect

your personal data, you should always contact ING if you suspect your personal data may have been compromised.

## 8. Changes to this privacy statement

We may amend this privacy statement to remain compliant with any changes in law and/or to reflect how we process personal data. This version was created on 1<sup>st</sup> April 2024.

## 9. Contact and questions

To find out more about ING's data privacy policy and how we use your personal data you can find contact information for Belgium below.

Country	Contact details ING	Data protection authority
Belgium	<a href="mailto:ing-be-privacyofficehr@ing.com">ing-be-privacyofficehr@ing.com</a> To access, rectify or erase your personal data. ING facilitates access to applicant data and the correction thereof through an on-line self-service system accessible via <a href="http://www.ing.jobs">www.ing.jobs</a>	Belgian Data Protection Authority <a href="https://www.dataprotectionauthority.be">https://www.dataprotectionauthority.be</a>