Your privacy is important to us.

You are careful about the use of your personal data – and expect nothing less from your bank-insurer: your personal and financial data should be handled with utmost care and discretion. You can rest assured that we will do just that. KBC will take every measure to ensure your privacy and your data are protected at all times.

You can read more about this in our Data Protection Statement, which tells you in detail what type of data this involves, how we protect it, for which purposes we use it, and how data is exchanged within and outside the KBC group. It also explains your rights and how you can exercise them.

Why does KBC need your data?

We work hard every day to provide you with the best possible service, perfectly tailored to your needs and preferences. To do that, we need to collect some information about you.

This information (data) enables us to make offers tailored to your individual situation.

You will always be in control of your data

You can access your data, correct incorrect data, have data deleted, or object to certain processing at any time. Simply send an e-mail to mypersonaldata@kbc.be. This is explained in more detail in Part 3.

Here are some of the most frequently asked questions we receive

I don't want to receive any more advertising (see 3.5.)

Send an e-mail to mypersonaldata@kbc.be, visit your KBC branch or contact your KBC agency or our staff at KBC Live. If you are a customer and you use KBC Mobile or KBC Touch, please use this form.

I would like to see what data you hold on me (see 3.1.)

Please e-mail your request to mypersonaldata@kbc.be. We may need additional information to verify your identity. If you are a customer and you use KBC Mobile or KBC Touch, please use this form.

I received a letter informing me that KBC holds data on me or my child, but I am not a KBC customer. How did you get my data?

We process your personal data for all kinds of purposes (see Part 2): perhaps you're an heir of a deceased KBC customer, or your employer joined one of our group insurance policies, or your child's grandparent opened a savings account with us for your child. As we aim to be transparent about the data we collect and how we process it, we have included this information in this document to make sure you are aware of the data we have on you or your child, and to allow you to decide whether and how you want to exercise your rights (see Part 3).

I am not a customer and want to have my personal data erased (see 3.3.)

Please e-mail your request to mypersonaldata@kbc.be. We may need additional information to verify your identity. If KBC no longer has an overriding ground for processing your personal data (e.g., performing a contract, legal requirement, etc.), KBC will erase it.

Data Protection Statement of KBC Bank NV

This Data Protection Statement comes into effect on 22 May 2026.

KBC Bank NV operates under the trading name KBC Brussels in the Brussels-Capital Region.

Preliminary: the salient changes in this version of the Data Protection Statement

KBC would draw your attention to the most important changes in this Data Protection Statement of KBC Bank.

- More information on the exchange of your personal data (including in the context of the capital gains tax)
- Renewal of the Kate Coin
- More information about the use of data in the context of PSD2

Part 1: to safeguard your privacy, we must work together

1.1. KBC Bank NV treats your data with the utmost care

KBC is the controller of personal data as described in this Data Protection Statement.

Every mention of 'KBC' in this Data Protection Statement refers to KBC Bank NV. KBC Bank NV is a member of the KBC group, which is an integrated bank-insurance group that provides financial services. More information on the activities of KBC Bank NV and the KBC group is available at www.kbc.com.

KBC Bank NV may modify this Data Protection Statement at any time. The most recent version is always available at www.kbc.be/privacy. KBC Bank NV will notify you of every all-important change to the content via its communication channels (e.g., websites, Bolero Online, KBC Mobile, KBC Touch, the Bolero app, etc.).

In addition, KBC Bank NV processes personal data on behalf of other entities in the KBC group. In so doing, it follows instructions issued by that other KBC group entity, which acts as data controller. This processing is included in the other entities' data protection statements. In certain cases, KBC Bank NV also processes personal data together with other KBC group entities as joint controllers. You can read more about this in Part 4.

We also recommend that you read KBC's cookie policy when you use one of KBC's digital channels, such as the KBC website or a KBC application. It explains what cookies are, which ones KBC uses, how you change your cookie preferences and how KBC protects your privacy. The cookie policy can always be found in the digital channel itself. For example, you can consult the cookie policy for the KBC website at KBC's cookie policy.

1.2. To whom does this Data Protection Statement apply?

We define several categories of individuals whose personal data we process:

Categories of individuals	
KBC customers	All former and existing customers or individuals who have an indirect contractual relationship with us, for instance a co-borrower (including minors)
Platform users	They have no customer relationship with KBC but use the Additional services in the KBC Mobile app
Prospects	Potential customers
Owners of one or more immovable properties in Belgium	They do not necessarily have a customer relationship with KBC but own one or more properties in Belgium
Individuals involved in the execution of customer orders	Your data may be processed if: - you are a beneficiary of a transaction - you have been designated as an ultimate beneficial owner/(legal) representative of a customer (including legal entities), for example through the Business Dashboard - you are a member of our customer's staff - you are a debtor of our client

KBC cannot exclude the possibility that it also processes information about other persons when they are provided to KBC, e.g. when a customer forwards this information in an email or names are mentioned on contractual documents.

1.3. What type of data do we process?

KBC processes different types of personal data. Below, you will find an overview of the different categories of data and examples of each category. You can see under which legal ground KBC processes this data in Part 2.

Basic identification and contact details	
Contact details	E-mail address, postal address, telephone number, username on social media platforms, gender (for the purpose of the address title)
Basic identification details	Name, date of birth, place of birth, nationality
Unique identification details	Internal identification means such as customer number, identity card number, company number, national registration number, driving licence number, passport number, identity card photo, signature, unique identifiers for your devices (e.g., Mac address, IP address, etc.)
Product data	
Data related to financial products	Account and card numbers, your products and services (payments, loans, insurance policies, savings & investments), contract details, product history, powers of attorney, capacity as director or owner of company, beneficiary
Data related to non-financial products	Your products and services, such as an additional service, contract details, product history
Product usage	Your transactions, salary and other income and expenses, growth of your wealth, changes in your wealth situation, investments, loans, insurance policies, movements on your accounts and their balances, the use of KBC apps
Derivative information	Data deduced from products, communication preferences, payment transactions, etc.
Preferences and your interest in our products and services	Your potential interest in KBC products, how your financial information has changed over time, advice we've previously given you, simulations, quotes, tenders
Personal particulars	
Family situation	Marital status, household composition and relationships
Overall financial situation	Your overall financial situation (assets, real estate you own, etc.)
Professional data	Your education, occupation, work experience, whether or not you are retired, whether you work for an employer or are self-employed
Key moments	Milestones like getting married, living together, building a family, plans for the home, or the death of a child, parent or your spouse
Lifestyle	Leisure activities, interests, club memberships, your home environment, property owned by you, TV viewing behaviour
Risk profile	Investor risk profile, fraud profile, credit risk profile, insurance risk profile, AML risk profile
Health data	Information about your health – KBC will ask you for separate consent for this processing
Biometric data	Short videos or photos that can be used to identify you. When this data is used to log into KBC Mobile, this data remains in the device on which KBC Mobile was installed. A separate consent is requested for this processing.
Location data	IP address and your telephone's technical readings, based on GPS, contact with a data exporter (ATM, branch, etc., deduced when you make payments in shops). If necessary, KBC will ask your permission for this.
Commercial profiles	Next best offer, segmentation profiles, gross operating income
Touchpoints	
Touchpoints & feedback	Record of contacts, brief report of the contact, comments and suggestions, past complaints, feedback via Kate
Recordings	Recordings of chat conversations, including conversations with Kate, telephone calls, online meetings, webinars and livestreams
Security camera footage	Recordings of security cameras in and around the KBC buildings

Online behaviour	
Click and browsing behaviour based on our own cookies or similar technology	Browsing, click and search behaviour and what you view or listen to online based on cookies or similar technology, such as SDKs (software development kit), managed by KBC itself
Click and browsing behaviour based on third-party cookies or similar third-party technology	Browsing, click and search behaviour and what you view or listen to online based on cookies or similar technology, such as SDKs (software development kit), managed by third parties
Publicly accessible online data	Information on your website, your blog, your publicly accessible social media profile
How you utilise your device	Your clicking, scrolling or typing habits may be used to identify unusual actions for the purpose of fraud prevention

1.4. What sources do we use?

We can collect your data in the following ways:

- You provide information to us when you become a customer, run a simulation, purchase one of our products or services or contact us through one of our communication channels
- We receive information from your organisation, such as your employer or another organisation of which you are a member
- Your family members or other individuals involved provide us with information
- We collect information that is public, for example because it is subject to a reporting duty, is included in press releases, is part of public sources such as the Crossroads Bank for Enterprises or has been made available by you
- We receive information from official bodies or other financial institutions
- We receive information originating from companies such as Blacktiger IHS Markit Group Limited, GIM, Graydon or business organisations; these organisations must have their own legal basis for their processing operations
- We obtain information from our partners within, for example, the ecosystems or the additional services in KBC Mobile, such as Housing & Energy, Mobility and Telecommunications

Part 2: KBC has many reasons for processing your personal data

2.1. For what purposes does KBC use my data if I am not a KBC customer?

2.1.1. I received advertising while I am not a customer

I am a platform user

In KBC Mobile and KBC Touch, KBC offers services of partners outside the general fields of banking and insurance. If data needs to be exchanged to ensure efficient use of the partner's service, KBC will inform the platform user accordingly, whereby KBC is usually the data controller in its environment (for payments or, for example, to pre-populate a form with your data) and responsible for the transfer of customer data to the third party For the 'Helena: check your medical data' service, KBC Insurance is the controller; for other services, it is KBC Bank. The partner company is the data controller in the context of the service to be provided (such as issuing your ticket). For more information, see the full list of partners: Additional services in KBC Mobile – KBC Bank & Insurance.

KBC uses platform users' personal data to conduct direct marketing campaigns (e.g., in KBC Mobile's start screen or by e-mail, push notifications or text messages) based on a legitimate interest. This may include services offered through KBC Mobile and KBC payment solutions. For this purpose, KBC processes the limited set of personal data that the user registered when they activated the use of the KBC platform (surname and first name, address, date of birth, mobile phone number and e-mail address). If the user agrees to the use of cookies, KBC can also send offers based on click and browsing behaviour. You may exercise your right to object to direct marketing, in which case you may still see an advertising message but it will be a general advertising message, for which KBC does not process customers' personal data.

I am a prospect

Both KBC Bank and KBC Insurance want to approach prospects with commercial proposals tailored to the situation and needs of the party concerned. KBC uses prospects' contact details to conduct direct marketing activities. Commercial messages by e-mail and/or through online channels (like social media) are sent only with the recipient's prior consent. A prospect who has given consent may need to be identified on the online channels; for this purpose, the prospect's e-mail address may be shared with the relevant online channel in encrypted form. Telephone marketing and mailings are always based on a legitimate interest and are limited for prospects that fall within the Private Banking and Wealth segment and are linked to companies. KBC receives these prospects' data from external or public sources, such as Graydon or Mediafin. This allows KBC to send personalised messages regarding or invitations for events. In doing so, respects anyone who is listed on the Do-Not-Call Registry and stores this data for 5 years.

2.1.2. I am involved in an estate file

KBC Bank will act as controller in the context of an estate file.

As a next of kin (surviving spouse, heir or beneficiary), you are involved in the deceased's estate file. As part of the correct handling of such files (tax return, distribution of the estate, management of outstanding invoices) and the correct provision of information, KBC Bank processes the necessary personal data of next of kin such as identification and contact details, financial product data, etc.

2.1.3. I am involved in an insurance file

KBC Insurance will act as controller in the following situations:

I am involved in an insurance file as an aggrieved party or a victim

If you are involved in an insurance file as an aggrieved party or a victim, KBC Insurance may process your personal data. This may also include your health data. Health data relates to your past, present or future health condition. KBC Insurance receives this personal data, for example, via a questionnaire when you take out insurance or based on medical reports following a claim event or directly from your insurer. KBC Insurance will generally ask for your explicit consent for the processing of health data.

I am involved in an insurance file as a witness

If, for example, you are a witness to a claim event, KBC Insurance may collect your necessary personal data (e.g., contact details) to correctly handle the claim file.

I am involved in an insurance file as a claimant

KBC Insurance may process personal data of claimants involved in a customer relationship. This occurs in the context of a life insurance policy, as a usual driver under a car insurance policy or as a beneficiary of an employee profit-sharing bonus programme and employees signed up to a group insurance policy.

When an intermediary such as an insurance broker or an insurance agent acts for KBC Insurance, personal data of the claimant will be processed in order to match the best possible insurance to the claimant.

2.1.4. I am the legal representative or contact person of a company (customer, supplier, prospect)

If you act as a legal representative or contact person of a company, you may be contacted by KBC Bank or KBC Insurance, where the entity you contact acts as controller.

KBC sends messages to its corporate customers, which may be for informational purposes and which sometimes requires certain action. In order to reach such customers, KBC sends the message to the representatives designated by the company.

KBC may also send marketing addressed to the company which also involves the processing of the representatives' data. Representatives may object to this processing.

KBC shares the personal data (including subsequent updates) of the legal representatives and ultimate beneficial owners of any company that is a KBC customer with other banks where the company is a customer or wants to become a customer. Subject to the same conditions, KBC can also receive personal data about the legal representatives and ultimate beneficial owners from other banks. This exchange ensures that every bank has the most up-to-date data of its customers. This is how KBC contributes to the fight against fraud and money laundering. Moreover, it may simplify and accelerate the onboarding process for both the company and the bank. KBC cooperates with Isabel and IBOS and the associated banks in this regard, via the secure platform KUBE.

In principle, if KBC profiles a customer-company, it is only on the basis of the company's data. Indirectly, personal data of the representatives may be processed (e.g. in the context of anti-money laundering legislation).

2.1.5. I have a power of attorney from a customer, supplier, business partner or prospect

If you have a power of attorney for someone who has a relationship with KBC Bank or KBC Insurance, the entity with which the person granting power of attorney has a relationship acts as controller for the processing of your personal data.

A power of attorney grants you authority as the person holding power of attorney to carry out transactions and/or perform acts in the name and on behalf of the person granting power of attorney.

On the one hand, there are standard powers of attorney (business or personal) where the person granting power of attorney grants access to the person holding power of attorney (e.g., a partner or family member) to manage their insurance policies, bank accounts, etc. Additionally, there are precautionary or lasting powers of attorney that guarantee that the personal wishes and needs of customers who are no longer able to make their own wishes and needs known are translated correctly from a lawful point of view.

When you accept the role of person holding power of attorney, depending on the type of power of attorney given, KBC will process the personal data needed to manage it.

2.1.6. I requested a quote or ran a simulation

You can run simulations for loans and insurance products on our website or in the KBC Mobile app without any obligation. KBC Bank is the controller for data processing in the context of loan quotes and simulations, while KBC Insurance is the controller for data processing in the context of insurance simulations.

When you run a product simulation, the data needed to assess whether the contract can be taken out and under which conditions will be used to provide you with the most accurate information possible. An example of this is the data collected and processed when a credit application is received (whether this involves an estimate of the property on which a mortgage or other security instrument is established makes no difference here).

The data you fill in in the simulation forms is not only processed for the administrative management of the process for which you filled in the form; it is also stored in the meantime, saving you having to enter it again if you interrupt the process or want to start again later.

If you started a simulation or sales process but stopped before completing it, we may contact you to see what went wrong and whether we can help, i.e. technical and administrative support for that specific process. If you enter into a contract based on a simulation, these data will be stored together with the contract and may also be kept if KBC refuses the offer, for as long as necessary to allow KBC to exercise its rights.

2.1.7. None of the above apply

If you have had any contact with KBC, KBC can process this information

If you've had contact with KBC staff at a branch or by telephone, chat or via Kate, this may be registered:

- to create an overview of the contact history
- to create a (short) record of the contact
- to enable staff to prepare 'to do' lists of tasks identified during the conversation
- to provide you with better service in the future.

Even if you are not a customer, KBC will store such information as you disclose. That information can be used if you subsequently become a customer. By adopting this approach, KBC seeks to avoid your having to constantly provide information or answer questions a second time. It also allows KBC to improve continuity in the services provided to you.

KBC works on the assumption that correspondence sent to staff in their capacity as KBC staff members (at a branch or on its fax or to a functional or individual KBC e-mail address, etc.) is business-related and that KBC is entitled to read it in the context of:

- their duties
- furnishing of proof
- workplace checks
- security
- combating fraud
- service optimisation and/or continuity, including the use of automated text analysis and editing to help KBC staff correspond with you quickly and efficiently.

Telephone calls may be recorded for training and evidence purposes.

When you participate in an event (physical, webinar or livestream), it is possible that you will appear in photos, video recordings, webinars or livestreams. In that context, spoken language may be translated or dubbed. If you so contacted KBC, KBC may process this information in accordance with its purposes and legal obligations.

Complaints handling

To handle complaints as effectively as possible, KBC will need to process certain data. This may involve data in KBC's possession as well as additional data that is provided.

Complaints can be submitted by customers, branches, agents, etc. as well as by external parties such as consumer organisation 'Test-Aankoop', the Belgian financial ombudsman service ('Ombudsfin') and the Belgian insurance industry's ombudsman service ('Ombudsman van de Verzekeringen').

In order to investigate the complaint, the complaints officers may request relevant data/information from different KBC entities (KBC Bank, KBC Insurance, CBC Banque), from the complainant himself or, for example, Worldline (if the complaint involves a credit card).

Temporary storage of security camera images

KBC may use CCTV in and around its offices and premises. When KBC uses these cameras, it respects specific rules applicable to them. KBC generally keeps images recorded by security cameras in and around KBC premises (identified with a sticker) for no more than one month. In certain cases, they may be kept for longer.

If you have questions about CCTV images, you can contact the CCTV Contact Centre at Egide Walschaertsstraat 3, 2800 Mechelen, or at CCTV@kbc.be.

2.2. KBC uses personal data to prevent fraud, money laundering and the financing of terrorism, and for risk management purposes

2.2.1. Customer identification & verification, Anti Money Laundering (AML) and sanctions

Banks are required by law to prevent, detect and report abuse of inside information or market manipulation and to report suspicious transactions to the authorities.

Banks are required by law to deploy all possible means to prevent, detect and/or report instances of money laundering and financing of terrorism to the authorities. This is a matter of public interest.

To achieve these objectives, KBC must verify AML and sanctions requirements during the onboarding of new customers, and monitor your actions and transactions. In this context, KBC may exchange your personal data with other financial and insurance institutions, just as they may exchange their customers' personal data with KBC in the same context.

Specifically, KBC has to:

- identify you as a customer, representative or Ultimate Beneficial Owner (UBO)
- verify your identity, for which KBC requests a recent copy of your identity card
- determine your profile (in relation to the risk of money laundering), which involves collating various personal and business data, such as whether you're a politically exposed person.

KBC must detect suspicious transactions and report them to the Financial Intelligence Processing Unit (CTIF - CFI).

Under embargo legislation, banks are required to screen all customers and transactions against sanctions lists.

2.2.2. Risk management, security & combating fraud

KBC is responsible for appropriately controlling risks (including at group level). This is required by law. It is required to detect, prevent, mitigate and address risks. Examples include credit, insurance, counterparty and market risk, risks concerning information management and statutory compliance, the risk of staff, customer and/or supplier fraud, the risk of unethical behaviour by staff or breaches by them of their duties of care. In addition, KBC can put customers in touch with third-party service providers either directly or indirectly as part of ethical due diligence.

To assess the reliability of these service providers, KBC may subject them to a screening on the basis of a legal requirement. For this purpose, KBC processes both company data and personal data of the company's legal representative(s) and/or Ultimate Beneficial Owner (UBO(s)) This risk management has to be ensured at both central level (gathering data on customers and groups of customers) and local level (e.g., by disseminating risk alerts). All manner of other types of risk profile are also determined in this context.

KBC conducts in-depth data analyses to comply with its legitimate interest to identify key risks, such as fraud, cyber and credit risk. This includes:

- Developing and conducting or creating studies, models – including those based on AI – and statistics for various non-commercial purposes
- Detecting risk signals in internal or external sources. These could indicate, for example, that you are in arrears with the repayment of a credit or that you are involved in a fraud case or a money laundering case. A risk signal may have considerable consequences, for example that KBC won't give you credit, or refuses or phases out the customer relationship with you
- Preventing fiscal fraud

- Guaranteeing the safety of persons and goods
- Combating fraud and detecting cyber risks. For example, every time you add a KBC debit card in the Payconiq by Bancontact app, Bancontact Payconiq Company sends data such as the card number and IP address to KBC through a secure channel, which KBC can then analyse further
- Identifying the Ultimate Beneficial Owner (KYC)

2.3. KBC sells products and provides services

2.3.1. Financial services and banking products

Conclusion and management of contracts

Before KBC concludes a contract for a financial or banking product, it may be necessary for certain information to be processed and/or to be analysed for profiling in order to assess the application and determine the terms and conditions This may include data collection and processing of simulations for products such as loans and for credit applications, such as property estimates for mortgages or secondary guarantees, and the processing of contact details for bank guarantees.

KBC provides the services agreed and prepares contracts at your request, which includes the performance of the corresponding accounting and administrative tasks. This pertains to the management of your customer file, including all contracts and services.

Examples of processing operations for the performance of contracts include the administration of accounts, payments, deposits, lending, and monitoring security arrangements.

KBC processes the personal data of representatives of legal entities for authentication and communication and to exercise the company powers regarding KBC services and products. For the more complex needs and requirements of SMEs and Corporate Banking customers, KBC offers specific support and advisory services, for example, on growth strategy or the optimal approach to working capital.

In the context of its products and services, KBC also acts based on a legitimate interest. This includes:

- Consulting the Individual Credit Register (ICR) for the provision of a private loan
- Gauging your knowledge and experience in relation to investments with a view to protecting investors (MiFID)
- Making calculations to supply a correct property estimate
- Exchanging personal data – where necessary – with other financial institutions in accordance with the rules for capital gains tax (for example, when securities are transferred and details such as the purchase price or date of purchase are needed to ensure that capital gains tax is calculated correctly).

Carrying out transactions

For payment transactions, KBC provides the payee with information on the transaction, such as general information on why the payment is not passing via a direct debit. KBC also offers account information services and payment initiation services, giving KBC access to the balance and transaction information of the accounts you hold with another bank, provided that these accounts can be accessed online. The account information is only used after you have activated the service and serves to carry out the requested service. If there are difficulties in connecting KBC to the account-holding bank, limited account information may be exchanged to resolve those problems. KBC processes this personal data on the basis of contract performance.

Verification of credit transfers

All European banks must make the 'Verification of Payee' service available to their customers. This service enables a check to be performed on the name of the recipient of a payment made by a transfer to see whether that name corresponds to the correct IBAN. KBC must offer this service to its customers when they are the payer. Like most Belgian banks, KBC provides the service by working with SurePay BV.

2.3.2. Additional services offered in KBC Mobile app

For a detailed overview of all additional services offered by KBC under the KBC Mobile contract, go to: Additional services in KBC Mobile – KBC Bank & Insurance.

KBC's own products and services

In KBC Mobile, KBC also offers its customers products and services outside the general fields of banking and insurance, such as Goal Alert, Digital Safe, Joyn loyalty cards and Energy-efficient at home.

Kate Wallet is a digital wallet in KBC Mobile that enables you in your capacity as a customer to store and view your cards, documents or other items. The personal data that is processed in Kate Wallet is limited to what is required to provide this feature and remains under your control. KBC does not use this data for any purposes other than making available and managing the Kate Wallet, nor does it enrich or reuse it.

Partners' products and services

In KBC Mobile and KBC Touch, KBC offers its customers services of partners outside the general fields of banking and insurance. If data needs to be exchanged to ensure efficient use of the partner's service, KBC will inform the customer accordingly, whereby KBC is usually the data controller in its environment (for payments or, for example, to pre-populate a form with your data) and responsible for the transfer of customer data to the third party. The partner company is the data controller in the context of the service to be provided (such as issuing your ticket).

Payment services remain the core of the KBC Mobile app. KBC integrates the Payconiq by Bancontact app in KBC Mobile, so that you can easily buy something or transfer money to an acquaintance without a bank card or cash. For the latter, it suffices to select your contacts from the contact list on your phone. KBC asks your consent to view that contact list and shares your selected contacts' mobile phone numbers with Payconiq, under the responsibility of Payconiq, in order to make the payment possible.

In the KBC Business Dashboard

In the KBC Business Dashboard, an online application for businesses, KBC also makes services of third parties available. With your account, you can log in to companies that provide specialised services for organisations, such as BrightAnalytics BV, Cashforce NV and Soluz.io NV.

KBC is usually the data controller in its environment and responsible for the transfer of customer data to the third party. The partner company is the data controller in the context of the service to be provided.

2.3.3. External real estate appraisals

To comply with European capital requirements regulations (CRR), KBC has external surveyors revalue the security at certain moments during the term of the loan. These revaluations do not affect the loan acceptance process but serve solely to comply with the CRR.

KBC has a legitimate interest to organise these external evaluations in a practical efficient manner. KBC provides the external appraisers with certain information about you and the property concerned for this purpose, such as your name and contact details, the address and type of property, etc.

2.3.4. Ask Kate your question in KBC Mobile or Business Dashboard

Kate is your AI-driven personal digital assistant. You can still ask Kate any questions, even if you've deactivated 'Extra convenience' in KBC Mobile. You decide how to use the service. This also applies to Business Dashboard users, where Kate will take into account the authorisations and access rights the company has given you. Answering some questions might require a more comprehensive analysis of personal data. This will only occur if you opt for 'Extra convenience' (KBC Mobile only).

The KBC Mobile Regulations or the General Terms and Conditions of the relevant digital service where Kate is available specify what you can expect from Kate and how the assistant works. If Kate is unable to assist you further, she can refer you to KBC Live.

2.3.5. 'Extra convenience' in KBC Mobile

If you accept the KBC Mobile Regulations, the 'Extra convenience' feature is activated – you can deactivate this feature at any time in KBC Mobile. As part of the 'Extra convenience' contract, KBC will offer you the following services:

- **Kate can send you messages about products, services and applications offered by KBC.** To be able to send you messages, and to anticipate your behaviour, wishes, risks and needs, Kate analyses both current and past information KBC has on you, your family, or as legal representative. This includes your transaction details, your use of KBC products and services, additional services offered by our partners in KBC Mobile, such as NMBS, and insights gained from market analyses and customer behaviour.
- **Kate applies these analyses to your specific situation (profiling) to be able to offer you personalised services.** If you use 'Additional services' in KBC Mobile, KBC may use the data processed in that context to provide you with extra convenience. For example, KBC can consult the data you see when you go to the Pluxee service, so that Kate can let you know when you're about to run out of Pluxee service vouchers.
- **As a customer, you receive additional information in KBC Mobile or KBC Touch, such as the location where you performed a transaction, the retailer's brand name and logo, etc.** This helps you understand the context of the transaction.
- **You are presented with practical and useful insights.** They help you understand your financial situation, such as an expected account overdraft or changes in your spending habits. We also provide information about your environmental footprint, which is based on a number of parameters such as your transactions and other relevant details KBC has at its disposal.
- **You are given access to two personalised dashboards, namely MyMobility and MyHome**. These dashboards are designed to give you, the customer, clear and easy access to mobility, energy and home-related solutions. In MyMobility, you can find information on vehicles, the total cost of ownership (TCO), car sales and relevant mobility content. MyHome provides you with information on available properties, a handy budget calculator and other useful tools and content.

You can deactivate 'Extra convenience' at any time without affecting the functioning of KBC Mobile. Parents can change this for their minor child in KBC Mobile via Settings - Your data and family. You will still be able to ask Kate any questions you have. KBC can also communicate with you separately from the Kate terms and conditions. In that case, personal data will only be processed if KBC has another valid legal basis for doing so.

The KBC Mobile Regulations or the General Terms and Conditions of the relevant digital service where Kate is available specify what you can expect from Kate and how the assistant works. If Kate is unable to assist you further, she can refer you to KBC Live.

2.4. KBC wants to know more about me in order to improve its products and services & uses my data for the development of digital solutions, commercial reporting, strategy & creation of models

KBC carries out the following processes based on its legitimate interest to improve its products and services, and to develop digital solutions and strategy.

2.4.1. Developing and providing certain services

KBC has a legitimate interest in processing personal data to support IT infrastructure, improve processes, coach staff and improve services. This includes:

- Evaluating, simplifying, testing and improving processes and the website, such as by using information from cookies (e.g., preference settings and click and browsing behaviour on our website) to follow up on a simulation left uncompleted, statistics or a satisfaction survey
- Evaluating and improving processes, in response to complaints
- Training and coaching employees, for example by recording telephone calls
- Improving processes such as:
  - Consulting the Individual Credit Register (ICR) for the provision of a private loan
  - Gauging your knowledge and experience in relation to investments with a view to protecting investors (MiFID)
  - Making calculations to supply a correct property estimate

- In certain cases, KBC does not process your data to personally identify or approach you, but because it is necessary to provide a service to someone else. For example: if KBC makes an assessment for its corporate clients about the sustainability of a building you live in, your data may be processed along with it.
- We may process personal data in connection with the development, training and deployment of artificial intelligence (AI) systems or other innovative technologies for the various purposes described in this data protection statement. For example, AI can be used to achieve operational efficiency or automate decision-making processes.
- Using control groups to develop and improve products or services. Here, customers are randomly assigned to groups in order to learn how certain products or services are experienced or used by customers. This helps KBC, for example, to better tailor its offerings to the needs of its customers.

2.4.2. Developing models for the KBC business strategy

KBC conducts in-depth data analysis to support its commercial activities. This includes building customer profiles for the following purposes:

- Gathering data from different companies of the KBC group in these analysis models makes it possible to obtain data-driven insights that support the KBC group in making strategic choices
- Developing commercial policies, taking into account customers' behaviour and wishes
- KBC creates models using AI.

2.4.3. Offer of aggregated insights

KBC uses your data, including transaction data, to create aggregated insights to analyse consumer behaviour, and to understand and predict behavioural and economic trends. These insights are anonymous and can be shared with partners. In exceptional cases, these anonymized insights may also be shared with customers.

2.4.4. Customer segmentation

KBC creates segments such as Private Individuals, Businesses and Private Banking.

2.4.5. Commercial reporting

KBC processes customer data for commercial reporting purposes. This processing is common practice for companies. It allows companies to tailor and adapt products/services to customers' needs and expectations.

It helps KBC to develop policies and strategies to make us more competitive in the market. It also facilitates communication with customers and improves relationship management. Customers' contact details will never be included in these reports. KBC does this based on a legitimate interest.

2.5. KBC uses my data for direct marketing purposes and to improve its commercial relationship with me

2.5.1. Direct marketing

KBC is keen to suggest its wide range of products and services to you. It may do so in response to requests or where it has an idea that you might be interested in or could benefit from a given product or service. You can receive this information through various channels: through KBC bank branches and insurance agencies, over the Internet and in apps, in the KBC Mobile app's start screen, by sending push notifications from KBC Mobile or your browser, by e-mail, post or telephone, via Kate, and at events. KBC regularly evaluates its communication channels in order to integrate new technologies.

KBC aims to ensure that information is provided in a way that's clear and will choose the channel that is the most appropriate for you. Commercial offers will not be addressed to children under 16 (if KBC knows the age), unless a legal representative of theirs has consented.

If you do not opt for the personalised agreement, you may still receive direct marketing based on a legitimate interest (Profiling for customer convenience and for marketing purposes). If you don't want to receive any direct marketing at all, see 3.5, which describes how to object to direct marketing. If you are unsure as to which situation applies to you as a customer, feel free to e-mail mypersonaldata@kbc.be for help.

a. 'Personalised' agreement

You can manage your notification settings and enable or disable certain notifications in our app. You can manage your notification settings under 'Settings'.

Start > Your photo or the Settings icon in the top left corner > Security and privacy > Privacy > Commercial settings > How do you want to receive commercial messages?

Depending on what kind of commercial offers you wish to receive, you can choose 'Personalised' or 'Standard'. If you choose to enter into a personalised agreement, you will receive personalised communications from KBC. The processing of personal data is therefore essential to the performance of this agreement.

Read the personalised agreement for details about the services and how this agreement works.

Who is offering the personalised agreement?

KBC Bank, CBC Banque and KBC Insurance (hereinafter: 'KBC') have joined forces in order to make you proposals and contact you for advertising purposes in as personalised a manner as possible. To the extent necessary and relevant, these entities can share your personal data with each other for this purpose. This exchange is also possible if you are not, or no longer, a customer of one of these entities. This enables KBC to approach you based on the overall profile it has compiled of you. This is important in order to ensure that KBC makes you relevant commercial proposals based on your specific situation. For this purpose, the entities are jointly responsible for the correct processing of your personal data and act as joint controllers. Accordingly, in order to exercise your rights, as described in Part 3 of this General Data Protection Statement, you can contact KBC.

What are KBC's legal grounds for using your personal data?

KBC will only use your personal data for personalised services if you have chosen to enter into this agreement. It does this on the basis of contract performance.

The specific personalised services are comprised of the following:

- Analysis and use of personal data in order to create a profile of you and subsequently be able to send you personalised commercial offers and messages. You will find more information about this under: '**Data processing in the context of personalised commercial messages'**
- Analysis and use of personal data in order to offer Kate Coins to you on a personalised basis and to customise the Kate Coins awarded in the context of the personalised' agreement, based on parameters determined by KBC and/or by KBC and the participating retailer jointly. You will find more information about this under: '**Data processing in the context of personalised Kate Coins'**

KBC sends commercial messages through the electronic communication channel of your choice:

- The personalised agreement always contains a provision for the receipt of electronic communications via push notifications from KBC Mobile, or by e-mail, text message, or WhatsApp message. You can always decide to adjust your communication preferences. This puts you in full control of how KBC sends you commercial proposals
- For example, you may decide at any time to have these communications restricted to the channels of your choice (e-mail, push notifications and text or WhatsApp messages), or not to receive any commercial messages electronically at all. You can make these changes in KBC Mobile (Privacy > Commercial Settings), KBC Touch (Profile > Privacy > Commercial Settings), KBC Live, or at any KBC branch
- If you choose certain electronic channels, KBC may send you advertising on all products through these channels. To guarantee high-quality communication, KBC may also rely on other service providers, such as communication and marketing agencies and similar companies (e.g., Google, Facebook, Instagram, WhatsApp). Sometimes KBC only uses information it has about you or your personal profile information held by them. In other cases, KBC combines this data. Depending on the type of cooperation, they may be processors or controllers (see Part 4).

What type of data processing is needed in order to provide the requested services?

In order to be able to deliver the services described in the personalised agreement, KBC must be able to predict your behaviour, needs and requirements.

KBC uses your personal data in this regard, which may comprise, for example, transaction data, data obtained from third parties, data obtained from public sources such as the Belgian Official Gazette, data and information gathered during conversations with you at the branch or other contact moments, and any insights KBC obtains based on general market analysis. KBC combines this data with other data and information relating to your family, business, etc. KBC may make highly personalised commercial proposals by applying this analysis to the combination of your individual or family situation.

Data processing in the context of personalised commercial messages

KBC conducts in-depth profiling as part of the personalised agreement in order to be able to tailor the advertising messages to your needs. KBC's intention is to send you commercial messages tailored to your situation as much as possible.

These commercial messages might focus on:

- KBC's products and services as well as those of carefully selected partners with whom KBC works in order to provide their services through KBC
- Financial products such as loans or insurance products as well as non-financial products like buying train tickets, ordering service vouchers, etc.

KBC generally sends these commercial messages to you directly, rather than through its partners. This ensures that KBC can minimise data processing by its partners. KBC has also made contractual arrangements with its partners, in which they confirm that they will comply with the privacy rules.

If you use 'Additional services' in KBC Mobile, KBC may use the personal data processed in that context and the personal data it may receive from its partners to tailor advertising even more closely to your personal situation.

An overview of partners who make such data available to KBC can be found here.

Data processing in the context of personalised Kate Coins

As part of the personalised agreement, you can earn and use Kate Coins at KBC and the participating retailers. KBC uses the transaction data to calculate and allocate the Kate Coins or benefit e.g. a cashback to which you are entitled. For instance, based on your purchases, KBC can see the number of Kate Coins you are entitled to and how many Kate Coins you exchanged for a benefit. KBC may also receive the data about your purchase such as the purchase price and category of the product or service from a participating retailer, for instance when you make a purchase with a participating retailer by clicking on a specific link in the Kate Coin Store. Based on your click, the participating retailer can infer that you are a KBC customer with a personalised agreement. The only purpose of this data exchange is to check whether you are entitled to Kate Coins and to calculate and execute your cashback or other benefit.

The Kate Coin Store contains both open and locked Kate Coin offers. If you decide to unlock a locked offer to earn Kate Coins, we process certain personal data at KBC in order to keep track of how many users activate a campaign. This personal data is not shared with retailers. Instead, they may receive aggregated, anonymous statistics related to unlocking their Kate Coin offer.

Kate Coins are personalised based on predetermined parameters by KBC and/or the participating retailer. This enables KBC and the participating retailer to determine the target audience more accurately.

In order to be able to deliver these parameters, KBC checks your personal data. Personal data that may be processed in this context includes transaction data, place of residence, gender, age, household composition, as well as profiles derived by KBC (from customer data), hobbies and what customers do in their spare time. This data is processed either separately or combined. In certain cases, your data, including transaction data, may contribute to the personalisation of the Kate Coins selection at the level of your family, e.g. for services such as energy provision linked to a household. In this regard, KBC only considers customers who are registered as partners with KBC as a family; children and other co-residents are excluded. KBC does not pass on this personal data directly to the participating retailer. If this personalisation takes place at the participating retailer's request and in consultation with KBC, KBC and the relevant participating retailer are joint data controllers. Feel free to contact KBC if you have any questions about exercising your rights, as described in this general data protection statement. Since KBC automatically selects for which Kate Coins you are eligible based on the parameter(s) described above, some of these decisions may be made automatically. You can read more about how automatically generated decisions are made in the Annex to the General Data Protection Statement – automated decision-making.

b. Limited personalised commercial messages, based on a legitimate interest

If you don't want a highly personalised offer, simply don't select the personalised contract. Even then, however, you may still receive offers or advertising from KBC (e.g., on the KBC Mobile overview page or via e-mail, push notifications or text message). KBC sends offers using only a limited number of details based on its legitimate interest (such as who you are and where you live, your date of birth, your marital status, your contact details, family relationships, the apps and products you have, or any lack of interest on your part in certain products).

KBC calculates the commercial discount for all customers, irrespective of their specific request. To this end, KBC analyses the behaviour and a few relevant characteristics of the customer based on customer profiles.

These limited personalised commercial messages may concern:

- Financial products and services from KBC Bank NV or KBC Insurance
- Non-financial products and services from KBC and from carefully selected partners in, for example, the Additional services offered in KBC Mobile, such as selling tickets from De Lijn. Learn more about the partners at [www.kbc.be/partners.](www.kbc.be/partners) Subject to your separate consent for the electronic channels (e-mail, push messages and text message/WhatsApp), KBC may send you advertising on all products through these channels. In the absence of your consent, we will limit ourselves to advertising on products similar to those you already own. You can manage your consents via KBC Mobile or KBC Live or at your KBC branch

KBC also processes the data of company representatives in order to send them advertising messages. Representatives have the right to object to this processing of their data.

In order to be able to send you the appropriate message through the correct channel, KBC may also call on other service providers. For this purpose, KBC may cooperate with communication and marketing agencies, and similar companies such as social media players (e.g., Google, Facebook, Instagram, WhatsApp). Sometimes KBC only uses information it has about you or your personal profile information held by them. In other cases, KBC combines this data. Depending on the type of cooperation, they may be processors or controllers (see Part 4).

KBC Bank, CBC Banque and KBC Insurance process personal data for direct marketing as joint data controllers. This allows us to inform you of – and promote – the full range of products, services and brands that KBC offers through its physical channels and digital apps. In order to exercise your rights, as described in part 3 of this general data protection statement, you can contact KBC.

c. Marketing based on your click and browsing behaviour

KBC may send you offers based on your usage patterns on its websites and apps, provided that you consent to the collection of this cookie data and it being used for sending personalised commercial messages. The cookie consent determines which offer KBC can send you. Your cookie data may be combined with other personal data according to the conditions set out under 2.5.

d. What if you do not wish to receive personalised advertising (or less of such advertising)?

You can manage your notification settings and enable or disable certain notifications in our app. You can manage your notification settings under 'Settings'.

Start > Your photo or the Settings icon in the top left corner > Security and privacy > Privacy > Commercial settings > How do you want to receive commercial messages?

Depending on what kind of commercial offers you wish to receive, you can choose 'Personalised' or 'Standard'.

You can always choose not to activate the personalised agreement if you no longer wish to receive personalised messages or only wish to receive general advertising messages. If you no longer want to receive any advertising at all, you can object to direct marketing.

e. KBC will not sell your personal data

KBC does not sell or hire out your personal data to third parties for their own use, unless you opt for this yourself by giving your consent or approval or in the context of a service. This enables KBC to share your data with third parties in the context of the partners listed here.

2.5.2. Improve its commercial relationship with me

KBC has a legitimate interest to improve its commercial relationship with its customers. KBC uses the following processes to achieve this:

Internal administration

- Supporting and facilitating the processes of customers beginning to use, using and ceasing to use products and services to avoid your having to go through an entire ID verification process again if you want to become a customer elsewhere in the KBC group. For instance, KBC can pass on your identity data to other KBC group companies in order to speed up their identification processes
- Keeping your customer file up to date to improve our service to you:
  - When you contact KBC staff at a branch or by telephone, chat or via Kate, this information may be registered:
    - to create an overview of the contact history;
    - to create a (short) record of the contact;
    - to enable staff to prepare 'to do' lists of tasks identified during the conversation;
    - to provide you with better service in the future.
  - KBC works on the assumption that correspondence sent to staff in their capacity as KBC staff members (at a branch or on its fax, to a functional or individual KBC e-mail address, etc.) is business-related and that KBC is entitled to read it in the context of:
    - their duties;
    - furnishing of proof;
    - monitoring the processes and services;
    - security;
    - combating fraud;
    - service optimisation and/or continuity, including the use of automated text analysis and editing to help KBC staff correspond with you quickly and efficiently.
  - Telephone calls may be recorded for training and evidence purposes.

Ensuring the best possible customer experience

We understand 'the best possible customer experience' to mean the following:

- Customisation of product and service offers by both itself and third parties
- Contacting you in connection with services you have requested through KBC Mobile, for instance to remind you to repay your outstanding credit card balance before the due date. You can disable these messages in KBC Mobile (under Profile/Notifications)
- Managing and optimising the administrative process, for example for completing forms
- Offering technical and administrative support if you started a simulation or sales process but stopped before completing it
- Digitisation of KBC services and products to improve their accessibility and user-friendliness with additional personalised information
- Exchanging the investor profile between the KBC group entities that provide investment advice in order to guarantee profile consistency and uniformity

- As part of relationship management, KBC partnerships, e.g., sustainability, may be discussed
- When you use the Additional service 'Calculate your renovation' in KBC Mobile, KBC partner Setle sends KBC an overview of all simulations run using Setle. This allows KBC to select the relevant simulation and the accompanying renovation report should you want to use this as proof of investment when applying for a loan
- When using additional services, personal data of third parties who have no relationship with KBC may be processed, for example data of third parties that are read from an uploaded invoice in the additional invoice management service.

Range of products and services

- Answering questions from customers or prospects (such as when preparing simulations or tenders)
- Creation of profiles to tailor KBC's commercial and product strategies to customers' behaviour and wishes

Complaints handling

To handle customers' complaints as effectively as possible, KBC will need to process certain data. This may involve data in KBC's possession as well as additional data provided by customers.

Complaints can be submitted by customers, branches, agents, etc. as well as by external parties such as consumer organisation 'Test-Aankoop', the Belgian financial ombudsman service ('Ombudsfin') and the Belgian insurance industry's ombudsman service ('Ombudsman van de Verzekeringen').

In order to investigate the complaint, the complaints officers may request relevant data/information from different KBC entities (KBC Bank, KBC Insurance, CBC Banque or any other financial entity of the KBC group), from the customer or, for example, Worldline (if the complaint involves a credit card).

2.6. KBC uses data to function as a company

2.6.1. Use of personal data in banking services in accordance with specific legislation

Use of personal data in banking services may be mandatory in accordance with specific legislation, such as the MiFID II Directive and PSD2 regulations. For instance, KBC Bank is required by law (PSD2) to give authorised third-party service providers access to balance and transaction information on your KBC accounts when you request them to retrieve it. In addition, KBC offers the possibility to retrieve (transactions and balance) information from accounts held at other banks when you request it and to show this information in KBC Mobile, the KBC Business Dashboard or KBC Touch. With your consent, KBC may also process data on the accounts you hold at other banks for other purposes. More information in this regard can be found in KBC Mobile.

KBC also shares personal data of individuals associated with a legal entity (Ultimate Beneficial Owner and legal representative) with, and receives such data from, other financial institutions in Belgium over the Kube platform. The purpose of this data sharing is to accelerate the legally required Know Your Customer data collection during the onboarding process for new corporate clients at a Belgian financial institution. It also encompasses the sharing of this personal data should this data be updated during the recurring KYC update processes. Information is shared only with financial institutions that need this data and is limited to what is required under anti-money laundering legislation.

2.6.2. Notification to and collaboration with authorities

KBC may be legally required to notify the authorities, for example in the case of personal data breaches, and in this context communicate your personal data. KBC can also receive requests about information from authorities or public bodies (see 4.11 for more information).

2.6.3. Legal duties and duty to disclose

KBC must comply with various national and international laws and regulations. Therefore, we report operations, transactions, orders or other requested personal data to competent local and foreign authorities regularly or when requested, depending on the circumstances. These authorities include financial, tax, administrative, criminal or legal bodies.

For example, KBC is required by law to share certain information with the Central Point of Contact of the National Bank of Belgium.

2.6.4. Internal reporting

KBC uses personal data to prepare internal reports, for example in the context of complaints management to prevent the recurrence of complaints, or to measure the effective use of certain functionalities in KBC Mobile. KBC does this based on a legitimate interest.

2.6.5. Internal administration for the KBC organisation

KBC processes personal data based on legitimate interest to comply with internal and regulatory reporting and internal control, and to communicate as a company. This includes:

- Organising the administration, (risk) management and oversight, such as the legal department, the risk management department and inspections
- Following up on the collaboration with partners acting as referrers/intermediaries for KBC or because KBC has referred you to them, and calculating any commission. For this purpose, KBC also uses data that these partners make available to KBC regarding your use of their services and the link with KBC's services
- Determining, exercising, defending and preserving the rights of KBC or persons KBC might represent (e.g., in disputes). KBC will also process personal data related to a dispute, even if KBC is not a direct party to the dispute. KBC will retain this personal data for as long as necessary for the dispute
- Increasing efficiency or producing other benefits for its organisation and processes
- Promoting sustainability and addressing environmental, social and governance (ESG) risks in its loan portfolio
- Contacting and evaluating future retailers

2.6.6. Developing and providing certain services (ICT)

KBC processes personal data based on legitimate interest to support IT infrastructure, improve processes, coach staff and improve services This includes:

- Developing and testing infrastructure, software and process development, artificial intelligence, models, etc.
- Investigating, monitoring and restoring incidents and infrastructure
- Using modern technologies, including artificial intelligence (for example, to consult certain customer data) or using Optical Character Recognition to read and extract information from documents

2.6.7. Mobilisation of credit claims

If a credit claim is mobilised from a credit agreement, we may disclose the obligations and, based on legitimate interest, the necessary details of the borrower and guarantor concerned to the transferee for the management of the claim. Mobilisation of credit claims is effected among other things in the form of securitisation, assignment of receivables and in the context of covered bonds. The recipient guarantees the confidentiality of the data.

KBC may disclose information about the credit agreements and the way in which they are executed to:

- All stakeholder third parties with a legitimate interest (such as the National Bank of Belgium or third parties to whom the credit agreement may be transferred or assigned)
- Parties that can assign a rating to relevant securitisation transactions

To improve the operation of market forces when credit agreements are converted into securities, the European Central Bank and the EU authorities impose reporting requirements. These reports are not by named individual but by contract detail (such as number of borrowers, term and due date of the credit, outstanding credit amount, payment arrears, characteristics of the mortgaged pledge). This information must be made available to investors in these financial instruments (often designated as asset-backed securities or residential mortgage-backed securities). More information in this regard can be found on the website of the European Central Bank: www.ecb.europa.eu (keyword: loan-level).

Part 3: your right to privacy

3.1. You can inspect your data

You can view some of the data directly yourself, for example using KBC Mobile, KBC Touch, Bolero Online or the Bolero app. If you exercise your right of inspection, KBC will give you as complete a list as possible of your data. However, it can happen that some personal data from the usual logs, stored/archived records and back-up files is not included in that list. Such data (e.g., cookie data) is not within scope of the data processed on an ongoing basis and is therefore not readily available. It is possible to request access to this data separately.

In some cases, anti-money laundering legislation prohibits KBC from giving you access to the personal data being processed about you. For example, KBC cannot give you access to an anti-money laundering investigation.

3.2. You can have your data corrected

It is possible that certain data held on you by KBC is not or no longer correct. You can ask for the data to be corrected or completed at any time via your branch or KBC Live. Certain data can also be modified in KBC Mobile itself. Customers of Bolero services can change certain details and manage their communication preferences themselves by navigating to the settings menu in Bolero Online and the Bolero app.

3.3. You can have your data erased

You can ask us to erase your personal data at any time. If KBC has no overriding ground for processing your personal data (e.g., a legal requirement), KBC will erase it.

3.4. You can object to your data being used for certain purposes

KBC can process data on the basis of legitimate interest. If you do not agree with this, you can object to it. If there are no overriding grounds not to do so (e.g., to combat fraud), we will comply with your request.

Below, you will find the main types of personal data processing operations based on the legitimate interest to which you can object, and to whom they apply:

PERSONAL DATA PROCESSING OPERATIONS	DATA SUBJECTS
Range of products (see 2.3)	Customers, owners
Developing models for commercial purposes	Customers, platform users
Direct marketing (see 2.5)	Customers, platform users
Direct marketing for representatives of legal entities	Customers, prospects
Commercial profiling	Customers

You are, of course, free to object to any specific processing of personal data at any time (see 3.10). If you do not specify the reasons for your objection, KBC will interpret your query broadly.

3.5. You don’t want KBC to process your personal data to send you direct marketing?

If you do not want KBC to use your personal data for direct marketing purposes, KBC respects your wishes. If you are a customer and you use KBC Mobile or KBC Touch, please follow the steps on this webpage. You can also send an e-mail to mypersonaldata@kbc.be, visit your KBC branch or your KBC agency or contact our staff at KBC Live.

If you are a platform user, KBC will also ask you for the mobile phone number you used to register with KBC. Even if you exercise your right to object to direct marketing, you may still see advertising messages on KBC’s digital channels or elsewhere. These may be general advertising messages for which KBC does not process customers’ personal data, pop-up notifications about the Private Banking newsletter (for which you can withdraw your consent at any time) or personalised advertising messages for which we only use your cookie data. If you don’t want the latter, you can withdraw your consent to the collection of these cookie data and them being used for sending customised commercial messages. You can find out how to do this in our cookie policy.

3.6. You can contest a decision taken by automated means

Some data processing operations and processes are fully automated, i.e. without any human intervention. Some automated decisions will have a greater impact on you than others, for instance in the case of a credit decision or insurance underwriting.

KBC will then inform you on the screens or in the terms of use of its own applications that it concerns an automatically generated decision before asking for your personal data. KBC discloses the logic of this automatically generated decision and its consequences at the moment of processing itself via a link to the 'Annex to the Data Protection Statement – Automated decision-making'.

You can always consult the 'Annex to the Data Protection Statement – Automated decision-making' at www.kbc.be/en/privacy.

If you are dissatisfied with the result of such a fully automated decision, you can contact KBC via KBC Live or any KBC branch. You can, for example, ask a KBC staff member to intervene or tell them why you disagree with the decision and request to view the decision taken.

3.7. You have the right to the portability of your data

You are entitled to ask KBC for personal data that you yourself have provided to KBC with your consent or in the process of performing a contract to be transferred back to you or to a third party. Legislation lays down a number of limitations to this right, as a result of which it does not apply to all data.

3.8. You can ask to restrict the processing of your data

In some cases, you may ask KBC to restrict processing of your personal data. Exercise of this right is conditional. You may exercise your right to restrict processing:

- during the period needed by KBC to verify the accuracy of your personal data if you challenge the accuracy of personal data concerning you that KBC processes;
- when you believe that a processing activity is unlawful;
- when KBC no longer has a purpose for processing the personal data but you still need it in connection with a legal claim;
- pending KBC's reply to whether KBC's legitimate interest weighs more importantly than yours when you have exercised your right to object to processing for which KBC invokes its legitimate interest as legal basis.

3.9. You can withdraw your consent

KBC will request your consent to process your personal data in certain cases.

KBC will request your consent:

- to process transaction data that you have personally added in KBC applications such as KBC Mobile for commercial models and profiles;
- for geolocation (unless expressly stated);
- to process data entered by you in a simulation or competition entry form in order to send you advertising messages;
- to enter underlying data in a form that needs to be completed with certain information for KBC to be able to process the form, in which case KBC will generally ask you to check the data's accuracy;
- to process your contact details as representative of your company when we transfer them to, for example, Cashforce;
- to process biometric data to identify you;
- to answer questions asked by third parties, unless there is another legal basis for doing so, such as a statutory duty;
- to process health data, for which we need your explicit consent;
- to send from the browser regarding the Private Banking newsletter.

When you give consent, you will also be given information on how to withdraw your consent. If you are no longer able to make your own wishes and known, a carefully drafted lasting power of attorney can guarantee that your personal wishes are translated correctly from a lawful point of view, including in banking matters. KBC will respect that expression of your will and your appointed proxy holder. KBC may request your consent through all possible channels, such as KBC Mobile's start screen, Kate or e-mail.

3.10. Your first points of contact

Please be as specific as possible when you wish to exercise your privacy rights, so that KBC can handle your request appropriately. KBC will need to be able to verify your identity in case someone else tries to exercise your rights. If you have any questions or feedback regarding the exercise of your privacy rights or are you unable to exercise your rights through the digital applications? Send an e-mail to mypersonaldata@kbc.be or contact your KBC branch or your KBC Insurance agent.

If you are a customer and you use KBC Mobile or KBC Touch, you can easily activate your right of access or your right to object to direct marketing. You can consult, amend or terminate the use of certain data yourself using KBC Touch, KBC Mobile, Bolero Online, KBC Business Dashboard, KBC 4 Business or a branch ATM.

If we can contact you digitally, we will give you access through the KBC Mobile app. If you prefer to receive your personal data through another channel (e.g., by post or e-mail), you should state this explicitly in your request.

You can also exercise your rights if you are a platform user, prospect or property owner. To do so, state your name, the telephone number you used to register in the application and, if applicable, the e-mail address.

3.11. Have a complaint or further questions?

If you have a complaint concerning exercise of your rights, KBC Complaints Management will be happy to look into it. You can contact KBC Complaints Management in any of the following ways:

- KBC Complaints Management, Brusselsesteenweg 100, 3000 Leuven, or via e-mail to complaints@kbc.be.
- Alternatively, use one of KBC's electronic channels such as the KBC website, KBC Touch, Bolero Online and the Bolero app

You can also always contact the 'Data Protection Officer' at KBC by writing a letter to KBC Group NV, Group Data Protection Unit (Group Compliance), Havenlaan 2, 1080 Brussels, or sending an e-mail to dataprotection@kbc.be.

If you do not agree with KBC's point of view, be sure to visit the website of the Belgian Data Protection Authority at www.dataprotectionauthority.be. You can also lodge complaints there.

Part 4: on cooperation, confidentiality and security

4.1. Access to and processing of personal data at KBC

At KBC, only authorised persons have access to your personal data, and only if the data is relevant to their tasks. These persons are bound by a strict professional duty of confidentiality and must abide by all technical instructions to safeguard the confidentiality of your data and the security of the systems. When processing personal data, KBC also uses several processors, i.e. companies that process the data on KBC's instructions.

4.2. (Joint) controllers within the KBC Group

KBC Bank NV also processes personal data jointly with other entities of the KBC Group as joint controllers. This means that together with one or more other KBC entities, we determine the purposes and means of processing your personal data. The responsibilities and obligations assumed by each entity in this situation are determined. In this case, we establish our respective privacy responsibilities through this way.

Joint processing responsibility occurs, for example, in the context of the joint distribution activities of KBC Bank, CBC Banque and KBC Insurance as an integrated bancassurance company. This manifests itself in the following processing activities, where the controllers may process personal data of each other if necessary:

- model building;
- common reporting at country-level and associated profiling;
- customer relationship management;
- 'personalised' agreement (more information under 2.5) and related profiling.

For 'Extra convenience' (see KBC Mobile regulations for more information) and associated profiling, KBC Bank and KBC Insurance are joint controllers, as well as KBC Insurance and CBC Banque.

K&H Pénzforgalmi Szolgáltató Kft. (K&H Payment Services Ltd.) processes personal data that enables it to provide products and services under 'KBC Merchant Services'. In this regard, K&H Payment Services Ltd processes your personal data in order to manage the customer relationship and to comply with its legal obligations in areas such as anti-money laundering. The data protection statement of K&H Payment Services Ltd is available on this web page.

You can always exercise your rights as a data subject with any KBC entity acting as a data controller for your data. Each controller remains responsible for ensuring that the applicable legal obligations are honoured for any processing it is involved in.

If there are legitimate reasons for doing so, such as the purposes listed in Part 2, KBC may also make data available to another KBC entity in Belgium or abroad. KBC may also process data if it was lawfully collected from another KBC entity, in Belgium or abroad.

4.3. Processors within the KBC group

For the processing of personal data, KBC Bank NV makes use of processors within the KBC group based in the European Union, namely KBC Group NV and KBC Global Services NV. Processing is carried out in Brno, Sofia or Varna, for instance, by the Shared Services Centre, branches of KBC Global Services NV in the Czech Republic or Bulgaria.

Some of the data processing performed by KBC Group NV and KBC Global Services NV on behalf of KBC Bank NV relates to oversight and support functions (at group level) such as financial reporting, the compliance function, the internal audit function, the inspection and risk function, anti-money laundering checks, complaints management, marketing support, support for invoicing, money transfers, credit processing, securities processing and ICT management for the KBC group.

For IT management, KBC uses KBC Global Services NV, sometimes in conjunction with other processors within and outside the KBC group.

KBC can use 24+ NV (www.24plus.be):

- As a contact centre for communication with KBC, which may contact the customer to schedule appointments, conduct satisfaction surveys, provide personalised information, etc.
- To carry out administrative processing for KBC, such as data registration

- To provide information to the tax authorities and the police
- To conduct advisory meetings following a death, and to register next of kin, heirs, legal representatives and beneficiaries

KBC works together with Everyone Invested, a subsidiary of KBC Asset Management NV, to analyse the conformity of individual investment portfolios with the KBC Investment Strategy. KBC exchanges anonymised data regarding the investment portfolios with Everyone Invested for this purpose.

4.4. Specialist processors and joint controllers outside the KBC group

KBC uses specialist third parties in Belgium and abroad to perform some processing operations, such as payments.

These include:

- SWIFT (www.swift.com) with headquarters in Belgium and establishments in many countries, for the global message exchange
- Equens Worldline SE (www.worldline.com), Mastercard (www.mastercard.com), Idemia (www.idemia.com) and, in certain cases, Bancontact Payconiq Company NV (www.bancontact.com) and European Payment Initiative (www.epicompany.eu) for payments and (credit) card transactions worldwide
- custodians and sub-custodians of financial instruments worldwide that are subject to local financial regulations
- institutions for the settlement and clearing of payments and securities transactions, such as the UCV (www.cecbelgium.be) (payment systems) and Euroclear
- SurePay B.V. (www.surepay.nl) for providing the service "Verification of the name of the beneficiary"
- transport companies (for cash and other valuables) and security firms
- consumer credit intermediaries (i.e. instalment loans)
- entities that support KBC in complying with its anti-money laundering obligations, for example by developing and using money laundering detection models
- Batopin NV (www.batopin.be), a network of bank-neutral ATMs, also for updating your electronic ID card details
- Appbot Pty Ltd (www.appbot.co), for monitoring and analysing feedback from users of KBC apps
- Renta Solutions NV for typical leasing platforms in automating vehicle ordering, vehicle registration and delivery (Order Register Deliver), maintenance, electronic invoicing (REI rS Electronic Invoice)

4.5. Other processors

KBC may directly or indirectly (e.g., through KBC Group NV) engage the services of other processors including, for example:

- consultants
- third-party business introducers to fulfil its general duty of vigilance as laid down by law:
  - the obligation to identify and verify identities;
  - the obligation to identify the customer characteristics and the purpose and nature of the business relationship;
  - the obligation to update information;
- market research agencies such as Ipsos (www.ipsos.com), Profacts (www.profacts.be) for issuing invitations and carrying out surveys
- ICT and ICT security service providers and artificial intelligence companies such as Microsoft, Cognizant, IBM, Amazon and HP, and specialist fintech companies such as Onfido for facial recognition during the customer onboarding process
- marketing and communication agencies and similar companies, whereby KBC uses personal profile information on you that is held by them, along with the data it holds on you, to be able to make targeted offers to you via their channels
- companies that support KBC in identifying and analysing your user behaviour in our apps and on our websites (e.g., Adobe, Dynatrace) In preparation for the analysis of Adobe Data Analytics, KBC will rely on the services of Amazon Web Services – Cloud Computing Services. The transfer and processing of personal data from, to and in Amazon Web Services is encrypted
- companies specialising in information archiving and access, such as Doccle (Doccle stores information on all our customers, including those that haven't opted for digital record-keeping). Doccle uses Amazon Web Services – Cloud Computing Services)
- companies specialising in scanning digital documents in order to digitise files with associated info
- companies specialising in solvency investigations

- companies specialising in specific services that KBC uses when offering services to its customers, such as Meeco for offering the Digital Safe in KBC Mobile
- printers for printing and the addressing of news magazines, cheques and transfer forms, badges, among other items
- translators and translation agencies
- social media management tools
- sworn real estate experts
- communications agency Motisha BV (www.motisha.com)
- companies providing Platform as a Service (PaaS) and Software as a Service (SaaS) in the cloud, such as:
  - the Microsoft Dynamics CRM app used by KBC to maintain customer overviews;
  - VEE24's video chat app for enabling digital communication with KBC;
  - the storage services of Microsoft Azure or Amazon, on which KBC can place its own platforms or software that process and store your personal data;
  - security services that screen Internet or e-mail traffic with KBC for cyberattacks or phishing scams;
  - TreasurUp, with whom KBC exchanges the contact details of company representatives to enable forex transaction analysis;
  - Nomios Belgium NV to set up a secure network connection between KBC entities worldwide based on SD WAN technology;
  - applications that facilitate and automate call recording, where appropriate, for instance as offered by Luware
  - data sharing platforms (DjustConnect)
  - ...

4.6. Processing by other data controllers

4.6.1. Other data controllers

As a data controller, KBC may also use other service providers or third parties, such as lawyers, notaries public or doctors, who themselves are data controllers.

KBC can outsource the collection of arrears on, for example, a loan, to specialised companies that themselves are data controllers. KBC also distributes its own products and services in cooperation with third parties who refer their customers to KBC for a loan, for example. They do not act as intermediaries in that regard and only pass on to KBC the personal data needed to prepare tenders or simulations. The third parties are responsible for passing on the personal data. The third parties have access to a dashboard to track purchases of products.

As a bank-insurer, KBC Bank NV cooperates with KBC Insurance, with both companies acting as data controllers with respect to personal data. Specific information regarding the controllers for the direct marketing domain is provided under 2.5.

KBC can itself act as a third-party business introducer for, for example, Payconiq and Belgian Mobile ID (itsme). KBC then processes personal data as data controller. KBC transfers this personal data to the third party. Likewise, a third party may act as a third-party business introducer for KBC.

When a mortgage expires and mortgage renewal is needed, KBC will call upon the services of a notary public. KBC provides the notary public with the national registration number(s) of the borrower(s), a copy of the original registration model, the first authenticated copy of the deed or other useful information that allows the notary public to renew the mortgage registration.

When, as a retailer, you want to install an electronic payment terminal and you ask KBC to act as an intermediary in that regard, KBC will pass on your contact details to Equens Worldline SE.

If you order goods and/or services online, as a customer you will find that several online retailers offer the KBC Payment Button. This button allows you as a customer to pay for online purchases while authenticating yourself using your familiar and trusted KBC e-banking channels (e.g., Touch, Mobile, O4B).

In certain specific cases, processors whose services KBC engages (see 4.4 and 4.5) may nevertheless act as controllers for the processing of KBC data. One such case is Microsoft, which also processes personal data for activities beyond the limited scope of a processor, such as billing, internal remuneration, internal reporting and internal organisation, combating fraud and security of their services, service improvement, financial reporting, and compliance with legal obligations applicable to them. KBC has entered into the necessary contractual arrangements with Microsoft to ensure compliance with the relevant data protection safeguards.

KBC can also cooperate with third parties such as Xerius Ondernemingsloket vzw. Xerius helps you to start up a business. During that process, Xerius may put you in touch with KBC to get your business account opened. Xerius then sends identification details to KBC. Xerius does this with your consent.

4.6.2. Voice Assistants

As a customer, you can ask for your balance and transactions via so-called virtual 'Voice Assistants' (Alexa, Google Assistant, etc.). In order to do this, you must first give KBC your consent to transfer the necessary account information. The further processing, such as the electronic pronouncement of your balance by the service, is carried out entirely by the third party that provides the service to you. KBC is not responsible for that.

4.7. KBC processes your data on behalf of third parties

KBC acts as a processor of your personal data on behalf of third parties further to the execution of orders at a number of stock exchanges or when acting as a broker. This is, for instance, the case for KBC Securities Services, part of KBC Bank providing securities solutions to financial institutions, banks, broker-dealers, asset managers and registered funds worldwide. KBC acts as a processor for certain third parties with respect to the Additional services. KBC Bank NV acts as a processor for KBC Insurance NV for the distribution of their products. KBC Bank NV is a processor for K&H Payment Services Ltd. to manage the contracts and contract information related to the offer of products and services under KBC Merchant Services. These products and services are offered by K&H Payment Services Ltd. KBC acts as sales agent.

4.8. KBC takes specific measures to protect your data

KBC ensures that strict rules are followed and that the processors involved:

- have only the data they need to perform their tasks;
- have given KBC a commitment that they will process this data securely and confidentially, and only use it for carrying out their tasks.

KBC ensures that the European data protection standards for personal data are applied worldwide within companies belonging to the KBC group and their branches. KBC also ensures that companies and corporate branches of the KBC group take appropriate measures to protect the data of legal entities.

KBC takes internal technical and organisational measures to prevent personal data finding its way into the hands of, or being processed by, unauthorised parties or being accidentally altered or deleted.

Strict security measures are in place to protect premises, servers, the network, data transfers and the data itself, and extra checks are also conducted by a specialist department in this regard.

To make online banking and investment services as secure as possible, security experts at KBC continuously analyse cyber-criminal activity so that they can hone the relevant security measures accordingly. Find out more at www.kbc.be/secure4u.

You and we together need to be aware that information shared by e-mail can sometimes be intercepted and, where possible, we must aim to use a different means of communication or to limit the amount of information we disseminate through this channel.

KBC websites and apps may contain links to websites or information of third parties. KBC does not check such websites or information. Parties offering these websites or this information may have their own privacy policies in place, which we advise you to read. KBC is not responsible for the content of those websites, their use or their privacy policy.

KBC sometimes facilitates the publication of (personal) data via social media such as Twitter and Facebook. Bear in mind that these channels have their own terms of use, with which you must comply. Publishing data on social media may have (undesirable) consequences, including for your privacy or that of persons about whom you share data. You may not be able to delete such published data quickly. You should therefore assess the consequences yourself as the decision to disclose data on such media ultimately lies with you. KBC does not accept any responsibility in that regard.

4.9. KBC does not keep your data for ever

KBC uses your personal data where KBC has a clear aim in mind. Once that aim no longer exists, we delete the data.

The period for which your personal data has to be retained is defined by law (usually until ten years after the end of a contract or execution of a transaction. For commercial claims it is thirty years after the end of a contract or execution of a transaction). The period can be longer where needed for the exercise of our rights. It may be shorter for simulations or if no retention period is stipulated by law.

For some applications, a more extended time horizon may be necessary, such as for carrying out surveys and risk and marketing models. Some insights only get clearer once they are viewed over a longer time span. This can result in the retention period being extended by ten years on top of the standard periods. As has been stated, KBC will in all cases sever connections to individuals as quickly as possible and work only with aggregated or anonymised data.

Information that you personally registered in the KBC Touch application 'Profile yourself' or that was registered at the branch, with the agent or in KBC Live, for example, is retained by KBC for five years.

Personal data of prospects is used by KBC for up to five years. A period of five years is necessary because KBC has a wide range of products that are also relevant to prospects. However, the prospect can always ask for their personal data to be deleted.

4.10. Data transfer outside the EEA

Legislation in some countries outside the EEA (like the United States of America or India) doesn't always afford the same level of data protection as in EEA member states. Where a non-EEA country is viewed by the European Commission as not offering an adequate level of protection, KBC Bank can cover the deficiency by, say, agreeing the required contractual guarantees with those third parties (such as a model approved by the European Commission), providing control mechanisms and implementing technical and organisational measures.

The transfer of personal data to countries outside the European Economic Area or to international organisations was screened by KBC. This transfer either takes account of the European Commission's list of safe countries or is based on reasonable and sufficient security measures or falls under a specific derogation from the GDPR.

The most important aspects of international data transfer are explained in more detail below. Feel free to e-mail mypersonaldata@kbc.be if you have any questions.

4.10.1 Personal data transfers within KBC

KBC may export some personal data relating to Corporates (e.g., contact details of representatives) to its foreign branches in Hong Kong, China, Singapore and the US, provided the corporate customer also operates in the country in question.

4.10.2 Processors outside the EEA

KBC always opts for the processing of personal data to take place within the European Union. Given the nature of certain processes (for example, when round-the-clock support is required), in some cases personal data may be transferred to processors outside the EEA.

Even if the data centre is located within the EEA, access from outside the EEA may still be possible in some cases (e.g., in case of technical problems, or when round-the-clock support is required). This is also considered data transfer outside the EEA.

For some processes, the processors' data centres may be located outside the EEA or accessed from outside the EEA, as is the case for the United States of America.

Even if the transfer is subject to an adequacy mechanism (such as the EU-US data protection framework in the United States of America), KBC will still ascertain that third parties provide an adequate level of protection.

Some examples:

PROCESSOR	DATA CATEGORIES
Microsoft	Basic identification and contact details, data relating to product ownership and product usage, etc.
AWS	Basic identification and contact details, data relating to product ownership and product usage, financial data, etc.
Adobe	Basic identification and contact details, data relating to product ownership and product usage, financial data, etc.

4.10.3 Data transfer to controllers outside the EEA

Similarly, when data is transferred to another controller in a country outside the EEA, these transfers are screened by KBC and the necessary measures are applied.

Some examples of controllers outside the EEA that may receive personal data from KBC (as at 22-05-2026):

CONTROLLER	DATA CATEGORIES	COUNTRY
Google (see 4.5.)	Basic identification and contact details, data relating to product ownership and product usage, etc.	United States of America

4.11. KBC thinks before it answers queries from outside parties

If you as third party have queries about customers, for example because you work for the police or are a notary public or lawyer, you can contact KBC's Third-Party Enquiries department, Brusselsesteenweg 100, 3000 Leuven. This specialist department will answer your query subject to bank secrecy obligations and the privacy laws. KBC bank branches and other departments will therefore refer you to that department.

4.11.1 Compliance with confidentiality obligations

As KBC has to comply with its confidentiality obligations and with the data protection legislation, it may only answer queries from third parties if they arise pursuant to a legal requirement, doing so is a prerequisite for performing the contract or the data subject has given their consent.

In the last case, KBC actually advises requesting the information directly from the data subject.

KBC declines liability if, as a result of foreign legal obligations, the lawful recipients of data are required to pass personal data about customers or legal entities on to local authorities. Or if they process personal data without an adequate level of security.

4.11.2 Requirement for financial ombudsman to address KBC Complaints Management

KBC Complaints Management provides answers to the questions posed by Ombudsfin, the ombudsman for banks. Third parties must contact the 'Third-Party Enquiries' department.

4.12. Securing data is something we do together

There are certain aspects of (technical) data processing over which KBC has no, or at best insufficient, influence and for which it cannot guarantee total security. Examples include the Internet or mobile communications (such as smartphones).

You will find more information on secure online banking at www.febelfin.be (safe online banking).

KBC Bank therefore suggests that you regularly take a look at the KBC website for information on safe online banking: secure4u. This site always contains the most up-to-date tips and recommendations to keep you secure online.