

GENERAL PRIVACY STATEMENT FOR CUSTOMERS IN THE BROAD SENSE

KBC SECURITIES NV

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<p style="text-align: center;">GENERAL PRIVACY STATEMENT FOR CUSTOMERS IN THE BROAD SENSE KBC SECURITIES NV</p>
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I. Introduction

A. *Respect for privacy*

KBC Securities is committed to protecting your privacy. KBC Securities endeavours to process (your) personal data in a lawful, fair and transparent fashion. The purpose of this statement is to inform you of the way in which KBC Securities processes your personal data as a customer (or prospective customer), holder of a power of attorney, guarantor, mandatary or representative of a legal entity or an entity with joint ownership of property.

B. *Processing of personal data*

Personal data is any information on an identified or identifiable natural person (referred to as the 'data subject' in the Privacy Act). It may involve a person's name, a photograph, a telephone number (including a work number), a PIN, a password, a bank account number, a link with a company or other persons, an e-mail address, etc.

Data processing refers to any single processing operation or entire processing procedure for personal data. The processing procedure is very wide-ranging, and includes collecting, saving, using, amending, and divulging data.

C. *Advice: read this statement carefully*

We would advise you to read this statement carefully because it refers to your rights and legal obligations. By virtue of the fact that you are a customer of KBC Securities, it is assumed that you have agreed, insofar as is necessary, to all the processing operations referred to in this privacy statement, including for the purposes of direct marketing (see below). If you do not agree with the way in which we collect and process your personal data, we would advise you to take the requisite action, for instance by notifying us accordingly through the channels provided (cf. 'Exercising your rights' below).

D. *More information – referral*

More information on Belgian data protection legislation is available on the website of the Belgian Privacy Commission: www.privacycommission.be.

E. *KBC Securities and the KBC group*

KBC Securities NV is a stockbroking firm that operates in Belgium and a selection of countries worldwide. KBC Securities NV has its registered office at Havenlaan (Avenue du Port) 12, 1080 Brussels.

KBC Securities is a member of the KBC group. The KBC group is an 'integrated bancassurance group', i.e. a group of companies that, through close co-operation, creates and distributes banking, investment and insurance products and provides related financial services. The KBC group's main target groups are individuals, SMEs and affluent customers. The group operates mainly in Belgium, the Czech Republic, Slovakia, Hungary and Bulgaria. In addition, the KBC group also operates via companies and entities in a selection of EU and non-EU countries. These non-EU countries include the USA, India, Russia, China, Singapore, Hong Kong, New Zealand and Australia.

The following entities, for instance, belong to the 'KBC group' in Belgium: [KBC Group NV](#), KBC Global Services NV, [KBC Bank NV](#), [CBC Banque NV](#), KBC Insurance NV, [KBC Consumer Finance NV](#), [KBC Asset Management NV](#), [KBC Securities NV](#), [KBC Autolease NV](#) and [KBC Lease Belgium NV](#).

More information on the activities of KBC Securities and the KBC group is available on the website www.kbc.com.

II. Processing responsibility

Pursuant to the Act of 8 December 1992 on data protection (commonly known as the 'Privacy Act'), KBC Securities is responsible for the processing of the personal data of, inter alia, existing or potential customers. This implies that KBC Securities is responsible for compliance with the legal requirements regarding the processing of your data for the purposes determined by KBC Securities itself (see below – 'For what purposes does KBC Securities collect and process your personal data?').

III. Your rights regarding the processing of your personal data

A. Your rights

Broadly speaking, you have the following rights regarding the processing of your personal data:

- You are entitled to access the data that is being processed about you.
- Where necessary, you can request in writing that incorrect details are corrected or that information which should not be kept is blocked or deleted.
- You can object to the processing of your data for direct marketing purposes.

B. Exercising your rights

The fact that third parties may be involved in executing tasks assigned to KBC Securities does not detract from your considering KBC Securities as the contact to avail yourself of your rights.

- In the first place you can turn to the KBC Securities Order Desk (078 / 353 353) if you wish to exercise your rights. You will be asked to complete a form in certain cases.
- Any complaints may be addressed to KBC Securities, Personal Data Department, Havenlaan 12, 1080 Brussels.

In some cases you can also exercise your rights directly with a third party. This applies for example to

- the databanks held by the National Bank of Belgium [www.nbb.be], such as the Central Portal of the National Bank of Belgium.
- the databanks held by the Ministry of Finance [www.minfin.fgov.be], such as the Ministry's Central Portal (see also 'my minfin' on the same website).

Please give as much detail as possible when exercising your rights, so that we can deal with your request as efficiently as possible. Please also remember that it must be reasonably easy for us to establish your identity when you exercise your rights, so that we can prevent anyone else from trying to exercise your rights.

If you are a (legal) representative, you can exercise the rights of the person you represent. For example, a parent may exercise the rights of his/her minor child.

For more information, or if you do not agree with KBC Securities' views, you may contact the Belgian Privacy Commission via the website: www.privacycommission.be.

C. Objection to direct marketing

You can object to the use of data for the purposes of direct marketing:

- by notifying the Personal Data Department, SBO, Havenlaan 12, 1080 Brussels, by letter
- by sending an e-mail to info@bolero.be; info@kbcmatchit.be;
- by **telephone** to the KBC Securities Order Desk (078 / 353 353);
- if you are **telephoned** by or on the instruction of KBC Securities and you object to this or to direct marketing in general, the person who calls you will register your objection if you so request.

If you have exercised your right to object, you can, if you so wish, subsequently grant consent for direct marketing. For details of what this entails, please refer to 'Special legitimate interest: (direct) marketing' Please note that KBC Securities may contact you, even if you have objected to direct marketing, for other purposes, such as a legal requirement or for the performance of a contract (e.g. transaction statements or account statements).

IV. Security and confidentiality

Only people properly authorised may access personal data that is relevant to performing their job. These people may only use the data to the extent this is essential to do their job. They are bound to observe strict professional secrecy and to comply with all technical instructions and requirements designed to safeguard the confidentiality of the personal data and the security of the systems that contain this data.

KBC Securities takes internal technical and organisational measures to prevent personal data being accessible to and processed by unauthorised parties, or being accidentally changed or deleted. There are internal security measures in place to protect the premises, servers, network, data transfers and the data itself. This security is supervised by a specialist department.

But *you can also play your part*. KBC Securities does not have any, or adequate, influence on certain aspects of (the technical process of) data processing. This is the case, for instance, for Internet or mobile communication methods (e.g. smartphones), where it is not possible to provide full security. When criminals, (including computer criminals such as hackers), are active, KBC Securities cannot be expected to always succeed in preventing attacks. Sometimes KBC Securities itself is unaware of such crimes, for instance if someone succeeds in using your identity details by installing spyware on your computer or by means of phishing.

That is why you are also asked to take into account that certain channels are less secure than others when transferring data to KBC Securities or requesting KBC Securities to transfer certain data to you. There are things you can do to prevent potential misuse, or at least make it more difficult. These include:

- installing antivirus software and keeping it up to date
- not leaving your equipment and means of access (such as Digipass) unattended and reporting the loss of means of access immediately
- logging out if you are not using an application (even temporarily)
- where use is made of passwords, keeping these strictly confidential and using strong passwords, i.e. avoiding obvious combinations of letters and figures and combining enough of both
- being vigilant about anything out of the ordinary, such as an unusual website address (e.g. www2.kbcsecurities.be), or unusual requests (e-mail requests for customer details), etc.
- complying with special instructions and guidelines from KBC Securities.

You should also bear in mind that certain means of communication (such as e-mail) are operated by an external supplier. If you and KBC Securities exchange messages using these means of communication, it is possible that they will be intercepted.

V. Processors appointed by KBC Securities

A. General

KBC Securities calls on specialised third parties (processors) operating either in Belgium or abroad to perform some processing operations, e.g. payments. They therefore perform processing on behalf of KBC Securities.

In such transactions, data may be transferred to countries, such as the USA or India, where data centres are located and whose legislation may *not afford data the same level of protection as in Europe*. However, considering the increasingly international nature of information technology and of the financial sector, it is unavoidable that data is sent outside Europe in certain cases.

KBC Securities ensures that any third parties involved:

- only have access to information that is needed to carry out the instructions given to them, and
- enter into a commitment vis-à-vis KBC Securities to process this information in a secure and confidential manner and only to use it for carrying out the instructions given to them.

KBC Securities may not be held liable if these third parties, in compliance with obligations imposed in other countries, transfer customers' personal data to local authorities or if these third parties are affected by incidents in spite of reasonable efforts on their part.

B. Processors within the KBC group

To a lesser extent, KBC Securities also uses 24+ NV (VAT BE 895.810.836 – www.24plus.be) as a contact centre for technical problems relating to Bolero online. Examples include answering telephone enquiries and handling e-mails concerning technical problems.

C. Specialist processors for the financial sector

KBC Securities calls on specialised third parties operating (including other entities of the KBC-Group) either in Belgium or abroad to carry out a number of customer transactions. This involves institutions and service providers including

- SWIFT (www.swift.com), with establishments in Switzerland and the USA, for global message exchange;

- custodians and/or subcustodians of financial instruments worldwide, who are subject to their local financial regulations;
- institutions for the settlement and clearing of payments and securities transactions, such as UCV (www.nbb.be > payment systems), Euroclear (www.euroclear.com) and LCH.Clearnet (www.lchclearnet.com).

In some cases these parties will handle an assignment for KBC Securities together with an assignment for others or a statutory assignment or one of their own. In these cases they are not just a processor.

D. Other processors

KBC Securities may also make direct or indirect (mainly through KBC Global Services) use of other processors, such as

- lawyers and other consultants,
- ICT providers (including security), such as IBM and HP,
- marketing and communication agencies

VI. For what purposes does KBC Securities collect and process your personal data?

KBC Securities collects and processes your personal data for various purposes and based on different justifications. Only the relevant information is processed for each purpose.

A. *Compliance with the law*

Pursuant to various pieces of legislation, KBC Securities is obliged to process certain data on you, its major obligations being:

- to);
- annually to communicate the identity of customers and their investment income (interest and dividends) [www.minfin.fgov.be], 174/1 §2 (1) Income Tax Code and the decrees executing it);
- to prevent and detect *money laundering* (at group level) and to notify the authorities thereof, for which you must be identified as the customer, representative or ultimate beneficiary, your identity must be verified and your (money-laundering risk) profile must be determined. This requires pooling a variety of personal data, and monitoring your financial dealings and transactions, in compliance with the anti-money laundering legislation (including the Act of 11 January 1993). This must be implemented centrally (pooling of data of customers and customer groups) and locally (including the issuing of risk signals);
- to prevent and detect *market abuse* (at group level), i.e. abuse of inside information or market manipulation, and to notify the authorities thereof. This in compliance with the market abuse legislation (including Articles 25 and 25bis of the Act of 2 August 2002);
- to process transactions for *accounting purposes*, in line with the accounting legislation (including the Royal Decrees of 23 September 1992);
- to honour *specific measures* (embargoes) directed against countries or persons, for which your transactions must be checked and, in some cases, blocked, in compliance with the embargo legislation (including Council Regulations (EC) 2580/2001 and 881/2002);
- to determine – to varying degrees – in the case of *investments* what category of investor (professional or non-professional) you fall under, and to gather information on your knowledge and experience. This is in-line with the MiFID legislation (including the Act of 2 August 2002 and the Royal Decree of 3 June 2007);
- *to report* to administrative authorities, such as transaction reports relating to investigations into market operation and potential market manipulation;
- to trace holders or beneficiaries of accounts with a view to activating *dormant accounts*, in line with the Act of 24 July 2008 (see a.o. dormantaccounts.be);
- to organise the appropriate management (preventing, limiting, detecting and addressing) of *risks* (at group level), including the counterparty and market risks, risks relating to data management and compliance with the law, the risk of fraud by employees, customers and/or suppliers, and the risk of unethical conduct or error on the part of employees. This is in line with the legislation governing financial institutions (including the Bank Act of 22 March 1993, the Investment Undertakings Act of 6 April 1995 and the Insurance Supervision Act of 9 July 1975. This must be implemented centrally (pooling of data of customers and customer groups) and locally (including the issuing of risk signals);
- to have an organisation to respond appropriately if you avail yourself of your rights under the *Privacy Act*, i.e. the data protection legislation (including the Privacy Act of 8 December 1992, the Acts of 11 March 2003 and the Royal Decree of 4 April 2003);
- to respond to legitimate queries from the *supervisory authorities* for financial institutions, such as the FSMA [www.fsma.be] and National Bank of Belgium [www.nbb.be], thus implementing the supervisory legislation (including the Act of 2 August 2002);
- to provide the authorities, in the event of *death*, with a summary of the deceased's assets, thus implementing the tax legislation (including the Inheritance Tax Code);
- to respond to legitimate questions from the *tax authorities*, thus implementing the tax legislation (including the Income Tax Code);
- to respond to legitimate questions from the *judicial authorities*, such as the police, public prosecutor, examining magistrate and courts, thus implementing the policing legislation and law of criminal procedure (including the Judicial Code and Code of Criminal Procedure).

B. Assessment prior to entering into a contract

Before entering into a contract, KBC Securities may (have to) process certain data to deal with an application and make a thorough assessment of the desirability of entering into the contract and/or the terms and conditions for concluding the contract.

C. Implementation of the agreement

As part of the relationship with the customer, there are various tasks to be performed and the services that the customer uses require processing for administrative and accounting purposes. In certain circumstances, this requires certain personal data being sent to an intermediary or counterparty (a broker or a custodian, for instance).

Examples of processing for the implementation of agreements are the administration of accounts, payments, deposits, monitoring securities, custody and financial instrument transactions.

KBC Securities also offers various channels which – subject to the terms and conditions set out in the applicable documents (e.g. regulations) and with or without a relative degree of security – you can use to communicate with KBC Securities, such as Bolero Online and the KBC Securities Order Desk. In that case, KBC Securities uses the (contact and security) data from these channels of communication to initiate and/or check communication. Examples: log-in details, passwords, certificates, and characteristics of the means of access (Digipass).

D. Legitimate interests

In addition to the purposes referred to above, KBC Securities and/or the KBC group has a number of other legitimate interests as a company/group of companies that require processing of personal data. In this context, KBC Securities endeavours to ensure that your privacy is affected as little as possible and that, in any event, any effect on your privacy is kept in balance.

For example, personal data is processed for purposes relating to:

- compiling studies, (risk, marketing and others), models and statistics, where the link to individuals is severed as quickly as possible;
- proof (archives);
- establishing, exercising and safeguarding the rights of KBC Securities or of those it represents (e.g. in disputes);
- synergy, improving efficiency, or other benefits arising from (common) processing by a processor (see under 'Processing responsibility' above);
- the safety and security of people and property;
- administration, (risk) management and control of the company and the KBC group, including by means of reports, by the management or management and control functions (at group level) and
 - o the legal department (including litigation management and legal risks);
 - o compliance (including prevention and investigations of money laundering and fraud, investor and consumer protection and data protection);
 - o risk management, and
 - o internal and external audit;
- centralised, coordinated and efficient administration of customers and groups of customers worldwide (at group level) or support services for this, including segmentation (e.g. individuals, companies, self-employed, etc.) and drawing up profiles for the management of customers or detecting customer needs;
- assessing KBC Securities' position as your financial service provider;
- assessment, simplification and improvement of processes, such as optimising campaigns, simulations and sales on the website, e.g. by following-up (incomplete) simulations, statistics, satisfaction surveys, and data from cookies (such as default settings and browsing history on the website).

E. Special legitimate interest: (direct) marketing

KBC Securities offers you, as an existing or potential customer, a range of financial services. KBC Securities does this via various channels: via the KBC Securities Order Desk, over the Internet (Bolero), by post, over the phone, or on special events. KBC Securities also looks to the future with new technological developments, such as

- adapting the design ('look&feel') and possibly even the layout of the Internet pages to your wishes, as expressed by you or deduced from your browsing history;
- adapting advertisements or Internet pages to interest you have previously expressed on the Internet or elsewhere;
- pre-filling forms with suggestions or known data to save you doing this, with the request that you check that this data is accurate and up to date;
- providing you with the option of saving simple information and forwarding it to potential interested parties (e.g. 'send to a friend' button) or publishing it on your web page or a social network site (e.g. 'share this message via Facebook' button) or via Twitter.

...
If you do not want to be contacted by KBC Securities with information, advertising material or proposals, you can object to the processing of your data for or on behalf of KBC Securities with a view to contacting you. More information on this is given under 'Objection to direct marketing' (above). This is extremely important, because KBC Securities assumes that when you, as a customer, provide KBC Securities with your contact details, it may also use these to send you information, advertising material or proposals (i.e. direct marketing). In particular, this is true of your mobile number and e-mail address. If you don't mind being contacted by KBC Securities with information, advertising material or proposals, but would prefer that a particular channel is not used for this, you can specify your preferences by e-mail to info@bolero.be, or via the KBC Securities Order Desk (078 353 353) so that KBC Securities can take this into account.

To improve its service to you, KBC Securities may pool various data it holds on you (including information from public sources such as the Belgian Official Gazette or reports of conversations with the KBC Securities Order Desk) and your relationships with others (e.g. your family or company). The data is interpreted by KBC Securities with the support of centrally managed processes and suggestions based on this data (to the extent that they are available) such as

- your **classification** as a customer:
 - o professional or non-professional customer,
 - o the information that has been gathered concerning your knowledge and experience,
- following up **signals** that relate to products offered by or via KBC Securities, e.g.
 - o participating in a competition (e.g. the KBC Stock Exchange Game),
 - o running a simulation,
 - o attending an event,
 - o using an application,
 - o requesting information.
- checking a **summary of the products and services** you use so that it may be possible to recommend to you a package of the same products and services that is available at special terms and conditions;
- assessing the (sub-)optimal **use of a product or service**, in order to possibly be able to offer you another, more suitable product or service;
- saving your **preferences**: whether and how KBC Securities may contact you with information, advertising material or proposals (by post, phone, etc.).

KBC Securities itself imposes a number of restrictions, including:

- KBC Securities does not gather any data for underage children for the purposes of direct marketing;
- KBC Securities does not sell or lease your personal data to third parties.
- Under direct marketing, KBC Securities does not use:
 - automatic data collection techniques, i.e. applications that siphon off certain personal data from the Internet without human intervention;
 - spyware;
 - respawning cookies, i.e. cookies that are surreptitiously re-installed after you delete them;

- tracking cookies, i.e. cookies that track your behaviour outside the website that installed them;
- cookies that last for more than two years.

VII. Consent

A. Assumption of consent if you become a customer or submit your data

If you become, or remain, a customer and you submit your data to KBC Securities (or a KBC group entity), you are assumed to agree to the processing as described in this privacy statement. It is also assumed from this that you want KBC Securities to contact you via the various channels (the KBC Securities Order Desk, post, online, etc.) to provide you with information, advertising material or proposals, or that at least you have no objection to this.

You can counter this assumption by objecting to processing where possible, such as processing for the purposes of direct marketing. For any formalities, see 'Your rights regarding processing of your personal data' (above). You cannot object to processing where this option is not available, which includes processing that is obligatory by law.

B. Information society – 'e-commerce' (mobile, e-mail, etc.) and cookies

If you provide a mobile number or e-mail address, it may be used for direct marketing. In principle, you will be asked to grant your express consent for this, but if that is not so – due, for instance, to an oversight or technical fault – we request you to

- notify us by sending a message to the KBC Securities Order Desk (078 353 353), and
- if you so wish, to indicate your objection to processing for direct marketing purposes (see above) by other channels.

Take into account the fact that not every use of your mobile number is commercial. KBC Securities for example offers a number of purely informational non-commercial text messages, including transaction confirmation or texted pin codes, etc.

If you accept the cookie – through your browser settings – KBC Securities will assume that you agree with the resultant data processing, even if this is personalised (see below for further details). If you only wish to be tracked anonymously, you can specify this on the relevant page ([downloadpage Google Analytics Opt-out](#)), or you can delete cookies or have them deleted at the end of each session via your browser settings.

If KBC Securities sends you an e-mail, it is able to measure the following attributes (a) whether you open the e-mail, and (b) whether you click on a hyperlink in the e-mail. If you perform these operations, this implies your consent with such measurement.

C. Retraction of objection

If you have objected to a form of processing (above) and KBC Securities was able to comply with your objection, you may only be contacted again with information, advertising material or proposals once you have granted consent for such processing.

D. Relatives and groups

You accept that KBC Securities (at group level, if appropriate) may process data on the relationship with and, if appropriate, details of related persons (e.g. partner, children, principals, etc.).

Customers who are legal persons accept – via their representative - that KBC Securities (at group level) may process details of the relationship and details of affiliated (legal) persons (e.g. parent company, subsidiaries, representatives, ultimate beneficiaries, etc.).

E. Representatives and groups

If a (legal) representative is acting in that capacity, he/she automatically also grants consent for processing the data of the principal. This includes:

- that the **parent(s)** grant(s) consent to process the data of his/her/their child or children;
- that the **interim administrator** grants consent to process the data of the person on whose behalf he/she is acting;
- that the **trustee in bankruptcy** grants consent to process the data of the person on whose behalf he/she is acting;
- that the **agent** grants consent to process the data of the person he/she represents.
- ...

Representatives, companies and legal persons that *give information* to KBC Securities on individuals associated with them undertake to do so only if the individuals in question are sufficiently aware of this and agree to it. The representative, company or legal person *holds KBC Securities harmless* against any and all claims (by those concerned) in this regard. Hence, for instance, KBC Securities is not responsible for compliance with the data protection legislation by a company that submits a list of users for an on-line application.

A representative has *access* to the data of the principal as part of his/her mandate. This also implies that a representative has access to these data during the term of his/her mandate, even if that mandate has been terminated in the interim.

F. Digitisation of documents

In order to improve its operational efficiency KBC Securities may decide to digitise documents (e.g. by scanning them) or to get you to sign documents electronically. If you provide KBC Securities with documents, you consent to such digitisation.

G. Social media – publication

KBC Securities sometimes facilitates the publication of (personal) data via social media such as Twitter and Facebook. These social media have their own conditions of use which you yourself are required to take into account and observe if you make use of them. Publication on social media may have (undesired) consequences, including for your privacy or that of persons whose data you share, such as the impossibility of withdrawing publication in the short term. You must estimate these consequences yourself, for you are taking the decision about the publication on these media. KBC Securities does not accept any responsibility in that regard.

VIII. More information on processing of specific personal data

A. General

KBC Securities processes personal data (that might be) relevant for the aforementioned purposes. Overall, for all purposes combined, this involves a range of different kinds of personal data: data relating to you as a person, the make-up of your family and other relationships, The following is a closer look at a number of these categories.

B. Public data

KBC Securities may process your data

- that is subject to a **disclosure requirement**, e.g. disclosure of your appointment as director of a company, protest of bills or bankruptcy;
- that you yourself have **made public**, e.g. information on your website or blog;
- that is in the **public domain**, e.g. because it is generally known in the region.

Such data may be *relevant* and used for most purposes specified by KBC Securities, including checking that data in KBC Securities' files is accurate and up to date and supporting (direct) marketing campaigns.

KBC Securities uses its best endeavours in logging the source and date of consultation of this data, so that it may, for instance, assess whether the data is still up to date.

C. Website – General – Cookies

KBC Securities websites (including www.bolero.be) use *cookies*. Cookies are small text files that are created by a program on the KBC Securities website server, but are saved on the hard disk of your PC.

These cookies are at least in part technically **necessary** for smooth communication between your PC and the KBC Securities websites (e.g., to coordinate with the operating and browser systems on your PC or to enable secure connection). Cookies can however also be **useful** for storing and are used to store on your PC a number of (default) settings, all or part of your login data, your browsing history and suchlike, and to send all or some of this data to the website to which the cookie is linked. The website is then able to use this incoming data to evaluate and improve the website and the processes used on it. Statistics, for example, can be compiled to record such information as the number of visits, the number of unique visitors and the average length of a visit to a particular page. KBC Securities also uses cookies for other, useful purposes.

More specifically, KBC Securities uses an application to analyse website use, namely [Google Analytics](#) (more information on www.google.be (corporate solutions) and [Google's Privacy Policy](#)) By changing the settings on your web browser, you can prevent cookies from being (automatically) **accepted on your PC**. This can, however, affect communication with the website: certain pages might not open, certain film clips might fail to play and certain data might not be saved for automatic retrieval upon a subsequent visit, etc. You can also **delete** the cookies on your computer, either manually, or automatically via the settings on your web browser, after each visit to the website.

In principle, you cannot be 'identified' by means of cookies. However, the computer you are using to browse the web can be identified (using, for instance, the IP address). This means that if a computer is shared or if the same person logs in from different computers, nobody – not even your Internet provider – can identify who the individual user is.

Further information concerning KBC Securities' *liability* for data on its website, on the intellectual property rights to the information on its website and other legal information is provided in the legal disclaimer on the website. You can generally find a link to the legal disclaimer at the bottom of each page of the KBC Securities website.

D. Website – Login

In principle, there is no way in which KBC Securities can know that you are the particular individual browsing on a particular computer. Once you have logged in, however (e.g. in Bolero Online), and are therefore identified, this can be stored by the cookie for a KBC Securities' analytics application. If this information is then passed on to KBC Securities, the latter is, for as long as the information is held on the cookie, both while you are logged in to Bolero Online and otherwise, able to track you not just anonymously.

You can *object to* this by opting to be tracked anonymously only. You can also delete your cookie or have it deleted at the end of each session using your browser settings.

If you did not opt to be tracked anonymously and KBC Securities therefore gathers your browsing information on a personalised basis, KBC Securities may use that information in support of (direct) *marketing campaigns*.

In the case of Google Analytics you solely have a choice between (a) being tracked with the possibility that Google in particular will be able to identify you, or (b) not being tracked. If you opt for the latter, Google will refer you to an application for download: [Google Analytics Opt-out](#).

E. Forms – competitions – simulations, etc.

If you fill in a form from KBC Securities, KBC Securities uses the data for *administrative management* of the process in which the form was embedded. This may relate to a competition, simulation or other application provided by KBC Securities. For instance, your data in a simulation that you interrupt or want to return to later may be stored temporarily so that you don't have to fill it in again.

To be able to *assess* this process, you may also be asked why you interrupted the process, at least if you had already entered sufficient identity details when the process was interrupted, e.g. by logging in to Bolero Online.

In principle, KBC Securities expressly requests your *consent* to also use the information on the form to contact you later, whether or not regarding information, advertising material or proposals. If you are a **customer** and are identified as such before or during the process (e.g. by logging in to Bolero Online), KBC Securities will assume that you wish this information to be stored, or at least do not object to this, and to be contacted based on the information on the form or the fact that you called up or filled in the form. In that case, KBC Securities will offer you the option to indicate that you do not grant such consent for that particular form.

KBC Securities acknowledges that *filling in* forms (particularly in complicated simulations) can be time-consuming. KBC Securities has therefore, where possible, developed forms where, if you have been duly identified as a **customer** (e.g. by logging in to Bolero Online)

- either some details are not requested, but are retrieved from the data available at KBC Securities, but where you are sometimes requested to check that the details are complete and up to date
- or some details are filled in where they are available at KBC Securities, but they can be amended.

F. Contact

If a KBC Securities employee contacts you, the contact is usually logged to build up a contact history, to provide a (brief) report of the contact and to serve as a reminder for future tasks.

G. Correspondence

Correspondence with employees of KBC Securities at their place of work (office address, office fax, departmental or personal KBC Securities e-mail address, etc.) is deemed to be of a professional nature and can therefore be consulted by or on the instructions of KBC Securities (employees, IT specialists, researchers, etc., as part of their job, e.g. efficient distribution of work and/or centralisation of tasks, for the continuity of service, provision of proof, a workplace audit, security or prevention of fraud).

H. Telephone calls

KBC Securities may listen in to or record telephone calls with you for employee training and coaching purposes, to improve quality, security and processes and to provide proof of instructions.

KBC Securities may keep these recordings for the period that problems concerning the furnishing of proof with regard to any instructions may arise. This applies particularly, but not exclusively, to phone calls to a call centre (e.g. the KBC Securities Order Desk) or help desk.

If KBC Securities uses a processor (e.g. 24+), the processor is also responsible for processing, listening in to or recording phone calls for staff training and coaching purposes and to improve quality. It may keep these recordings for a short time (maximum of three months) for that purpose.

I. Transaction data

Transaction data is used to execute and check transactions, including the submission of payment and settlement instructions to other financial institutions. In addition, it may be used, to a certain extent, to obtain a clear picture of the customer for the purposes of preventing or detecting money laundering and for internal purposes to improve knowledge of, and service to, the customer.

IX. Data exchange within the KBC group

A. Sending and receiving

Unless there is a legal impediment, such as a local obligation, professional confidentiality obligation or data protection legislation, KBC Securities may

- send your (personal) data to other KBC group entities in Belgium or abroad, or
- process the personal data if these have been legitimately collected by another entity of the KBC group in Belgium or abroad.

This applies to both KBC Securities branches and to other entities.

KBC Securities cannot be held liable if the KBC group entities referred to above, in compliance with the legal requirements prevailing abroad, have to pass on personal data on customers to local authorities.

B. Limit

At KBC Securities and within the KBC group, personal data of customers will only be processed and viewed by the entities:

- with which the customer has, had or wishes to have a contractual relationship or contacts
- whose intervention is necessary to deliver or follow up on services provided to the customer
- to fulfil, at group level, statutory or prudential requirements that are imposed by regulators or arising from expectations of good governance, or
- to prevent fraud, by employees and/or customers, including money laundering.

C. Uniform protection

The KBC group ensures that the European standards for protection of customer data are applied worldwide in companies and branches of the KBC group.

D. Why is data exchanged within the KBC group?

Data may be exchanged within the KBC group for the following purposes

- complying with legal requirements, making an assessment before entering into a contract or implementing an agreement (cf. above)
- the following legitimate purposes for KBC Securities as a member of the KBC group
 - o **administration, (risk) management and control** of the company and the KBC group by the management or the management and control functions (at group level), particularly security and prevention of fraud (including money laundering)
 - o centralised, coordinated and efficient **administration of customers and groups of customers** worldwide (at group level) or support thereof
 - o **compiling studies, (risk, marketing and others), models and statistics**, where the link to individuals is severed as quickly as possible
 - o establishing, exercising and safeguarding the **rights** of KBC Securities or of those it represents (e.g. in disputes).

X. Queries from third parties

A. When may queries from third parties be answered?

In view of KBC Securities' confidentiality obligation and the data protection legislation, queries from third parties – with one exception – must be justified either by a legal provision or subject to the consent of the individual concerned.

KBC Securities cannot be held liable if the lawful recipients of personal data, in compliance with the legal obligations pertaining (abroad), have to pass on personal data on customers to the local authorities or process it without an adequate level of security.

B. Whom should you contact if you are a third party?

If, as a third party (e.g. the police, notary public or a lawyer), you have queries about customers, you should address your request to KBC Securities, Personal Data Department, Havenlaan 12, 1080 Brussels. They will consider your request and provide you with an answer, *if* your request is justified in accordance with, inter alia, bank secrecy, the confidentiality obligation and the data protection legislation. Other departments are not permitted to answer such queries, but will in principle therefore refer you on.