

Privacy statement at ING Bank Śląski S.A.

General information

This privacy statement provides information about the processing of personal data by ING Bank Śląski S.A. (“Bank”).

The Bank makes every effort to ensure the safety and protection of your personal data during their processing. The Bank processes personal data in accordance with the effective data protection laws and regulations.

Individuals whose personal data are processed by the Bank

The Bank processes personal data of natural persons:

- who are prospect clients, clients, counterparties or suppliers of the Bank. Clients are also broadly understood as persons for whom the Bank executes financial transactions upon clients’ instructions;
- whereto marketing correspondence can be addressed in line with relevant laws;
- who provided the Bank with contact details due to services and products offered by the Bank;
- who are acting in their capacity of persons authorised to represent legal entities or other organisational units in order to verify their authorisation;
- who are parties to applications, complaints, or other documents submitted to the Bank.

The Bank processes personal data in the scope of mandatory laws which require processing of specific data.

Personal data processed by the Bank

The personal data processed by the Bank may include, among others, data concerning: identity documents, domicile, name, address, personal status, position or capacity (such as function or role if acting on behalf of or for a client, supplier or counterparty), financial transactions, e.g. account numbers or other unique identifiers, signatures, email addresses, phone numbers. In a specific situation the Bank may also process data concerning IP address or Bank’s website views, while the said data might not constitute personal data. Depending on the banking activity type, the Bank qualifies the clients based on their credit capacity or financial standing.

Purposes of data processing

The Bank processes personal data for the following purposes:

- assessing and accepting of, entering into and performing agreements with clients, business partners or suppliers, executing payment and other financial transactions, recording and financially settling services, products and materials delivered to and from the Bank, including communication with individuals involved in contracts (e.g. insured persons, beneficiaries, intermediaries), and dispute resolution and litigations;
- managing relationships and marketing to establish or extend a relationship with a client;
- handling requests/incidents/complaints in accordance with the standards adopted by the Bank;
- statistic, accounting and management ones, including internal management reporting and analysis along with activities such as statistical and scientific analyses for the development and improvement of the Bank’s products and/or services, conducting internal audits and investigations; finance and accounting activities, implementing business controls, managing mergers, acquisitions and divestitures;
- ensuring safety of the Bank and any individuals, counterparties, suppliers and their property located at the Bank outlets; authentication of client, supplier or counterparty status and access rights to services and products offered by the Bank;
- ensuring compliance with laws and regulations as well as sector-specific guidelines and regulations including, but not limited to, anti-money laundering and anti-terrorist financing regulations; or safeguarding the security and integrity of the Bank or the financial sector. This includes, in the scope permitted by the law: the detection, prevention, investigation and combating attempts at unlawful activities or conducting internal investigation procedures or requesting actions from law enforcement authorities or using the available IT systems.

Disclosing personal data to third parties, including ING Group entities.

In conjunction with an activity instructed to the Bank or under a specific provision of law, the Bank may disclose personal data to third parties such as counterparties, other financial institutions, suppliers or other service providers, intermediaries, beneficiaries of transactions, courts, regulatory or supervision authorities. As provided by the above-referred laws, the Bank may transfer data related to an activity instructed at the Bank to specific IT systems.

The Bank may entrust other entities with personal data processing, under provisions of laws and relevant agreements. ING Group entities may be among the entities with whom the Bank cooperates provided that their involvements is necessary to reach purpose permitted by the law and it is regulated by a relevant agreement.

Personal data retention period

The Bank shall retain personal data only:

- for the period required to serve the purposes for which the personal data were collected or for which they are further processed;
- to the extent necessary to comply with an applicable legal requirement; and/or
- as advisable in light of an applicable archiving provisions.

Security

The Bank has implemented appropriate, and commercially reasonable, technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access and all other unlawful forms of processing. The Bank has implemented IT risk standards and other relevant policies and procedures on the security of personal data.

Right of access, rectification, deletion and objection

If the Bank processes your personal data, then you the following rights:

- right to overview your personal data processed by or on behalf of the Bank;
- right to have the Bank rectify or delete your personal data if the data are incorrect, incomplete, or not processed in compliance with applicable laws;
- right to object to the processing of your personal data on the basis of compelling legitimate grounds relating to your particular situation provided that the Bank bases its processing on its legitimate interests or those of a third party to whom the Bank has disclosed the data;
- right not to opt in for receiving direct marketing communications from the Bank or to withdraw a granted consent therefor.

To exercise any of the above rights please write to:

ING Bank Śląski S.A.
Management Board Bureau
ul. Sokolska 34
40-086 Katowice

Privacy statement modification

The Bank reviews privacy statement regularly. This privacy statement was last updated on 28 April 2014.