

“SUMMARY TABLE” - Third party and/or ING Group common infrastructure¹

(see Article 7 of the Schedule “Country Specifics Luxembourg” of the Wholesale Banking General Terms and Conditions of the Bank)

	Description of the service	Type of shared data	Access to the data
<p>Services of access to Third-Party Payment Service Providers in connection with the Revised Payment Services Directive (PSD2) and other financial services subscribed by the Customer</p>	<p>To enable Third-Party Payment Service Providers (Third-Party PSPs) to collect information on accounts, to initiate payment operations and to confirm the availability of funds in accordance with the legal obligations of the Bank and the applicable regulations regarding payment services,</p> <p>To enable and support national and/or international products or services subscribed by the Customer, including payments or reporting tools (statements of accounts, transactions and fees reports, ...), cash management tools, cash pooling services, documentary credit, lending product and services, spot and forward exchange product, as well as channels and/or tools and/or portals and/or platforms offering access to the above listed products and services by the customer.</p>	<p>The data transferred include, inter alia, the Customer’s identity, his country of residence, his IBAN, his associated means of authentication (including the LuxTrust certificate), the associated link between the Customer and his payment accounts, his account balances, the availability of existing funds in the accounts at any given time, and the details of the payment operations performed.</p>	<p>In this context, some information may be made available in a confidential manner to the ING Bank NV entity and/or to its subcontractors in the Netherlands, Belgium, Germany, Spain, Slovakia, Romania, Poland or Philippines.</p>
<p>Know Your Customer (KYC) Services</p>	<p>To perform in a centralised manner by ING BANK NV (in the Netherlands) for its subsidiaries and branches (including ING Luxembourg) the necessary controls and checks on the basis of applicable national and international legislation and regarding, in particular, identification of customers and beneficial owners, regular media screening relating to clients, their agents, representatives and UBOs, monitoring of transactions and anti-money laundering and counter-terrorist financing, both upon opening accounts and throughout the lifetime of these accounts. This centralised management will also enable the Bank to classify its customers on the basis of their specific situation as regards various applicable regulations such as applicable legislation on anti-money laundering and the financing of terrorism, FATCA, CRS, MiFID, etc.</p>	<p>The data transferred relate to all the identifying data of the Customer and, where applicable, of their officers and beneficial owners including their identifying data, date and place of birth, passport number, national and/or tax identification number, address, place of residence, telephone number, and in general all the data communicated when opening the account or thereafter with regard to KYC and source of funds and all the information communicated to the Bank during each transaction performed on the accounts opened with the Bank.</p> <p>The data transferred to the provider selected by ING to perform the screening, “Regulatory DataCorp Ltd” (or any other entity of the same group), are the first name, last name, date of birth and country of residence.</p>	<p>In this context, some information may be made available in a confidential manner by ING Luxembourg or by ING Bank NV to: (i) Financial Sector Professionals (FSP) located in Luxembourg and their subsidiaries located in Europe (including in Poland and in Hungary), as well as (ii) their subsidiaries and branches and/or their subcontractors in The Netherlands, Poland (including PWC), the United Kingdom (including Delta Capita), Slovakia, Romania, Philippines and India (including Genpact Ltd),</p> <p>Some data relating to the customer may be made available, in connection with the screening, to the provider based in the UK. The screening and its results will be recorded in a database stored on a cloud platform managed by Amazon Web Services (AWS)*,</p>

¹ The subcontractors thus designated by the Bank may be regulated or unregulated entities that are either subject by law to an obligation of professional secrecy or contractually required by the Bank to comply with strict rules of confidentiality.

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			whose servers are located in Ireland and Germany.
Swift and Payment Services Platforms	<p>To process payment transactions via Swift and send messages via the same service, generally speaking, in addition to storing and archiving such messages and monitoring, filtering and verifying the said payment transactions or messages.</p> <p>To process and execute all processes related to customer's incoming and outgoing customer payment transactions as well as to store and archive such transactions.</p> <p>To track and monitor payment transactions initiated or received at ING Group level.</p> <p>To generate payment and account information reports for our corporate customers.</p>	<p>The data transferred relate to all the data included in the various fields in the messages or payment systems (Swift or otherwise), including but not limited to: the Customer's identity, his address, his IBAN, his account balance, the activity on the accounts, the identity of the instructing parties or beneficiaries of payment transactions and all the details of such transactions in general.</p>	<p>In this context, some information may be made available in a confidential manner to Swift, ING Belgium and/or its subcontractors in the Netherlands, Poland and Slovakia.</p> <p>In this context, certain information may be made available on a confidential basis to ING Belgium and/or its subcontractors including Equens Worldline in the Netherlands.</p>
Tech Service	<p>First-level IT assistance to the users of the Bank in Luxembourg.</p>	<p>Under this contract the service provider may have access, occasionally and within the framework of the IT assistance, to any data hosted on the Bank's IT infrastructure.</p>	<p>In this context, some information may be made available in a confidential manner to a Financial Sector Professional (FSP) located in Luxembourg.</p>
Tech infrastructure services	<p>Provision of an infrastructure hosting the Bank's applications to a Financial Sector Professional (FSP) and a workstation infrastructure managed by ING Bank NV (Netherlands) allowing a secure workplace environment including email service, active directory service and mobile application management service as well as physical desktops, File Servers and Shared Service Desk.</p> <p>Making available, via a cloud computing-type infrastructure managed by ING Bank NV (in the Netherlands) items and applications enabling a data store to be managed.</p>	<p>The data transferred concern the email service, active directory service and mobile application management of ING Staff.</p> <p>The Customer's data that may be transferred include (without limitation): name, email address, phone number, company name, email content and attachments.</p> <p>The data transferred in the private cloud computing infrastructure are the same as mentioned in the KYC services and credit and market risks management services.</p>	<p>In this context, some information may be made available in a confidential manner to a Financial Sector Professional (FSP) located in Luxembourg and to ING Bank NV (Netherlands) and/or its partners in Poland, Portugal, Romania and in Ireland.</p> <p>The infrastructure platform and data will be hosted and stored on a Microsoft Azure cloud platform* with servers located in the European Union, Austria, Finland, Ireland and the Netherlands.</p> <p>Regarding the ING private cloud managed by ING Bank NV, only Luxembourg ING's employees have access to the data stored on it.</p>
Services related to printing and customer document management	<p>Customer documents formatting, printing and scanning service</p>	<p>The data transferred concern all the customer data contained in customer documents, including the last name and first name, address, account number, transactions and account balance.</p>	<p>In this context, some information may be made available in a confidential manner to a Financial Sector Professional (FSP) located in Luxembourg in the context of the digitalisation of documents and their printing, as well as to ING Belgium for the formatting of types of customer documents.</p>
Credit Risk Management Services	<p>Central orchestration and storage of credit applications and decisions (whether the time of the initial credit application and during the life</p>	<p>The data transferred include all customer data related to a credit application, a modification or any other event related to the life cycle of</p>	<p>In this context, some information may be made available in a confidential manner to ING Bank NV in the Netherlands, Belgium, Poland</p>

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	<p>of the loan), determination of credit limits and credit exposures per customer.</p> <p>Monitoring and modelling of credit and market risks and internal and external reporting of the Bank's credit risks in different market conditions (scenarios).</p>	<p>the product as well as any supporting documents.</p> <p>This information includes the identity of the customer (or guarantor), the object to be financed, the ownership structure and the identity of the customer's (or guarantor's) investors, the verifications necessary for the Bank to know its customer, the customer's (or guarantor's) financial data (such as balance sheet, turnover, number of employees, performance), collateral and guarantees and any other information held by the Bank (such as credit or debit balance, existence of credit facilities or other credits granted by the Bank and their outstanding amounts).</p>	<p>and/or to its subsidiaries or branches worldwide.</p>
<p>Market Risk Management Services</p>	<p>Monitoring and modelling of market risks in general, internal reportings and export of the Bank's interest rate tradings risks and liquidity risks.</p>	<p>The data transferred are of a financial nature: customer reference, account number, account balance, repayment schedules, type and characteristics of the products subscribed to, remuneration conditions, etc.</p>	<p>In this context, some information may be made available in a confidential manner to ING Bank NV in the Netherlands or to its subsidiary in Belgium.</p>
<p>Web Banking</p>	<p>MyING, to offer a web banking platform on iOS/Android internet and mobile applications.</p> <p>Inside Business Portal and Payment, to provide a single internet and mobile access point for Business Banking customers to manage their payments and access reporting related to payments, bank credit and financial markets.</p> <p>Inside Business Connect, to enable a connection between the customer's Enterprise Resource Planning systems and ING BANK NV (and/or its subsidiaries or branches worldwide).</p>	<p>The data transferred include, <i>inter alia</i>, the Customer's identity and the required data to manage daily bank activities amongst others:</p> <ul style="list-style-type: none"> • Authentication and security and fraud prevention • Personal data and consents • Product Overview (Current accounts, Saving accounts, Visa accounts, Loan accounts...) • Payments (SEPA Payments, Standing orders, Beneficiary management...) • Mobile Payments with Payconiq • Alerts (email and push notifications) • Account balances • Account movements • Account Aggregation • Secure messaging • Electronic documents <p>Proposal and Subscription to products and/or services</p>	<p>In this context, some information may be made available in a confidential manner to a Financial Sector Professional (FSP) located in Luxembourg, to ING Bank NV and/or its subcontractors in the Netherlands, Belgium or Poland, or even the subsidiaries or branches in which the customer also has accounts.</p>

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<p>Digital Communication Channels</p>	<p>Making available secure digital communication channels (video conferencing, audio calling, chat and messaging).</p> <p>These channels use Internet cloud services.</p>	<p>The data transferred concern the information necessary to establish the communication:</p> <ul style="list-style-type: none"> • IP address • Phone number • Email address • Photo or video • Technical identifier of the ING Contact Person <p>The communications are recorded and stored by ING and may be used as means of proof in accordance with the applicable General Terms and Conditions.</p> <p>The operator of the Cloud services only has access to technical data depending on the channel (and not to the communications' decrypted content):</p> <ul style="list-style-type: none"> • IP address • The message's encrypted content (for which only ING has the decryption keys) for the duration of the communication; before being deleted at the end of the call. 	<p>In this context, some information may be made available in a confidential manner to ING Bank NV and/or its subcontractors in the Netherlands, Belgium or Poland.</p> <p>The infrastructure platform and the data will be hosted in an Amazon Web Services (AWS) cloud platform* located in the European Union in Ireland and Germany.</p> <p>As regards the private cloud operated by ING Bank NV (Netherlands), only ING Luxembourg employees have access to the data stored there.</p>
<p>Multiline (for companies only)</p>	<p>Hosting and management of the Multiline multi-banking platform through which any company having subscribed to this service can, in particular, consult data linked to its bank accounts data and initiate payment transactions.</p>	<p>The data transferred includes, among other things, the customer's identity and the data needed to manage its accounts on a daily basis, including:</p> <ul style="list-style-type: none"> • Authentication and security and fraud prevention • Data linked to its accounts: consultation of balance and list of transactions <p>Payments (SEPA, standing order, management of payees).</p>	<p>In this context, some information may be made available in a confidential manner to a Financial Sector Professional (FSP) located in Luxembourg.</p>
<p>Central services for OTC financial instrument transactions</p>	<p>All OTC transactions between the Customer entity and the Bank are centralised on ING Bank NV's platforms in the Netherlands, in order to improve customer service and to allow for central monitoring and legal controls, including without limitation for EMIR, MIFID, or MIFIR regulations.</p>	<p>The data transferred include Customer entity data, namely the name of the legal entity, the Legal Entity Identifier, the email address and the transaction details.</p>	<p>In this context, some information may be made available in a confidential manner to ING Bank NV in the Netherlands and/or its subsidiaries or branches located in Belgium, Slovakia, the United Kingdom, Singapore, India and the Philippines.</p>

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<p>Central services related to acquired positions in financial instruments in the European markets.</p>	<p>In order to identify shareholders, transmit information relating to general meetings, facilitate the exercise of shareholders' rights and meet the Bank's regulatory obligations regarding SRD II (Shareholder Rights Directive II EU 2017/828).</p>	<p>The data transferred include in particular: Customer's name, postal address, email address, unique identifier (TIN, LEI), position held of the relevant security as well as customer's choice in case of voting at the general meeting.</p>	<p>In this context, some information may be made available in a confidential manner to a Broadbridge Financial Solutions Ltd service provider based in the UK, and to a cloud infrastructure solution (IBM-Managed Private Cloud)* whose servers are located in the European Union, France and Germany.</p>
<p>Management of credit or debit card management</p>	<p>Comprehensive management of credit or debit card processing:</p> <ul style="list-style-type: none"> - at the level of transactions effected through such cards, as well as operations during the card's lifetime (ordering the card, blocking the card, contactless function, etc.) - monitoring suspicious or fraudulent transactions - managing complaints at the level of the Visa network. 	<p>The data transferred include the Customer's last name and first name, his address, IBAN number, availability of existing funds in the accounts linked to his cards at any given time.</p> <p>The data managed by the providers include card information and details of transactions effected with the card.</p>	<p>In this context, some information may be made available in a confidential manner to ING Bank NV (Netherlands), its subsidiaries in Poland and to a Financial Sector Professional (FSP) based in Luxembourg, namely Worldline Financial Services.</p>
<p>Production of credit or debit cards</p>	<p>Management of the production of credit or debit cards and their delivery to customers/cardholders.</p>	<p>The data transferred include in particular the Customer's or cardholder's last name, first name, address, and information linked to the debit or credit card.</p>	<p>In this context, some information may be made available in a confidential manner to ING Bank NV in the Netherlands or its subsidiaries in Poland and/or to their partner Thales (or its subsidiaries) in France and/or in Germany.</p>
<p>Signature sharing platform services</p>	<p>Use of a platform to collect electronic signatures relating to the legal documentation between the Bank and its Customers.</p>	<p>The data transferred include, among others, the documents to be signed, the last name and first name of each signatory, his position, his link with the legal entity for which he acts, his phone number (in order to send SMS messages) and his email address.</p>	<p>In this context, some information may be made available in a confidential manner to a cloud infrastructure provider provided by Adobe and hosted by Amazon Web Services (AWS) whose servers are located in the European Union, Ireland and Germany.</p>
<p>Marketing event management service</p>	<p>Use of an external platform to collect the electronic registrations of guests, customers and prospects to marketing events organised by ING Luxembourg.</p>	<p>The data transmitted concern the following identification data (encoded directly) by the person registering online for such a marketing event in response to an invitation:</p> <ul style="list-style-type: none"> • Last name • First name • Company name for legal entities • Email address <p>Phone number (optional)</p>	<p>In this context, some information may be made available in a confidential manner to ING Bank NV in the Netherlands or to its subsidiary in Belgium, and to its partner Via FUTURA bvba, based in Belgium.</p> <p>The data will be recorded in a database stored on an Amazon Web Services (AWS) cloud platform* whose servers are located in the European Union, Belgium, the Netherlands and the United States as regards the email address.</p>

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<p>Cash Management</p>	<p>When the Customer subscribes to any product allowing cash management by automatic switching of liquidity between the main accounts, sub-accounts and participating accounts.</p>	<p>The data transferred concern the customer's employee data (company name, customer number, etc.) and financial data (account balances, account movements, etc.) within the group.</p>	<p>In this context, some information may be made available in a confidential manner to ING Bank NV in the Netherlands, Belgium and/or its worldwide subsidiaries participating in the subscribed cash management product.</p>
<p>Global Customer support</p>	<p>To provide support in subscribing to and setting up the international financial products and services offered by ING Group, particularly in the area of payments and/or cash management.</p>	<p>The data transferred concerning the customer include in particular:</p> <ul style="list-style-type: none"> • Name • Address • Telephone number • Email address, • Account number • Nationality • TIN <p>And the financial data include:</p> <ul style="list-style-type: none"> • Proof of payments • Account statements • Account balances • Bank confirmations • Requests for direct debits and standing orders 	<p>In this context, some information may be made available in a confidential manner to ING Bank NV in the Netherlands and/or its subsidiaries or branches worldwide in connection with the products and/or services purchased.</p>
<p>Customer Relationship Management Services</p>	<p>To register, view and share on centralised platforms within ING Bank NV and its subsidiaries information supplied by the Customer and any other information relating to the Customer which enables the Bank to better serve the Customer.</p>	<p>The data transferred include among others:</p> <ul style="list-style-type: none"> • Customer data, notably the Customer's identity, address, ownership structure, industry, town and country of incorporation; • data of Customer's contact persons including name, address, job title, date of birth and contact details such as telephone number, email address, LinkedIn profile. • data from Customer interactions, such as meeting minutes, participation to campaigns and events • product characteristics, such as credit and market risk limits, outstanding balances, account references. 	<p>In this context, some information may be made available in a confidential manner to ING Bank NV in the Netherlands and/or to its subsidiaries or branches worldwide.</p> <p>ING uses a service platform from SFDC Ireland Ltd (Salesforce) hosted in a cloud of Amazon Web Services (AWS)*. The data remain in the European Union data centres located a.o. in Ireland, France and Germany.</p>
<p>Lending administration services</p>	<p>Business processes related to Front Office and Back Office lending activities such as capturing customers credit data in related tools for financial analysis, check of the powers of the signatories of credit documentation and other related contractual documents, the creation of risk rating proposals, the</p>	<p>The data transferred include all information related to credit applications and supporting documents.</p> <p>It includes notably, the identity of the Customer (or guarantors), the object being financed, the Customer's ownership structure, the identity of</p>	<p>In this context, some information may be made available in a confidential manner to ING Bank NV in the Netherlands, and/or to its subsidiaries or branches in Belgium, Poland, Romania, Slovakia, Philippines and Sri Lanka.</p>

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	<p>monitoring of creditor and guarantor commitments and periodic credit reviews.</p>	<p>investors, know your customer due diligence information, signatories data, financial data of the Customer (or guarantors) (such as balance sheet, turnover, number of employees, performance) and any other financial information held by the Bank in relation to the Customer (or guarantors) (such as credit or debit balance, existing credit facilities or other loans granted by the Bank or other ING entities and their outstanding amounts).</p>	<p>Some data may also be accessed by Acuity Knowledge Partners in Sri Lanka as sub-contractor of the branch of ING Bank located in Sri Lanka.</p>
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