

"SUMMARY TABLE - Shared infrastructure of third parties and/or the ING Group¹ concerning ING LEASE Luxembourg S.A. (see Article 15 Outsourcing of the "General Conditions of Leasing" of ING Lease Luxembourg S.A.)²

	Description of the service	Type of shared data	Access to the data
Know Your Customer (KYC) services	Perform the necessary checks and inspections on a centralised basis by ING Bank NV and/or ING Luxembourg (on behalf of their respective subsidiaries) based on applicable national and international laws, and in particular with regard to the identification of customers and economic beneficiaries, carry out regular "screening" in the media of customers, their agents, their representatives or economic beneficiaries and the fight against money laundering and terrorist financing both when entering the relationship and throughout the duration of the customer relationship. This centralised management will also allow ING Lease to classify its customers based on their own situation with regard to the various applicable regulations such as the applicable anti-money laundering and anti-terrorist financing laws, FATCA, CRS, DAC6, etc.	<p>The data transferred concerns all the identification data of the customer and, where applicable, of its directors and economic beneficiaries as well as those of any guarantors, including, in particular, identity details, date and place of birth, passport number, national and tax identification number, address, place of residence, telephone number, and more generally all the data communicated when entering into the relationship or subsequently in terms of customer knowledge and source of funds and all information communicated to ING Lease at the time of each transaction.</p> <p>The data transferred to the supplier selected by ING to carry out screening in the media (namely "Regulatory DataCorp Ltd" or any other entity in the same group) are the company name, trade name, first name, surname, date of birth and country of residence.</p>	<p>In this context, certain information may be made available on a confidential basis to ING Luxembourg and ING Bank NV and/or to their subcontractors in the Netherlands, the United Kingdom, Poland, Slovakia, Romania and the Philippines.</p> <p>Certain customer data may be made available to the UK-based supplier in connection with media screening. The processing and its results will be recorded in a database hosted on an Amazon Web Services (AWS) cloud platform* whose servers are located in Ireland and Germany.</p>
Technical service	First level IT support to ING Lease employees.	Under this contract, the service provider may have access, on an intermittent basis and as part of IT support, to any data hosted on ING Lease's IT infrastructure.	In this context, certain limited information may be made available on a confidential basis to a Financial Sector Professional (PSF) located in Luxembourg.

¹ The subcontractors thus appointed by ING Lease Luxembourg are regulated entities which are either subject by law to an obligation of professional secrecy or contractually bound by ING Lease Luxembourg to comply with strict confidentiality rules.
² If the customer is also a customer of the bank ING Luxembourg, the summary table concerning the shared infrastructure of third parties and/or the ING Group appended to the applicable general terms and conditions of ING Luxembourg is also applicable. This table is available at www.ing.lu

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<p>Technical infrastructure services</p>	<p>Provision of infrastructure hosting ING Lease's applications to a Financial Sector Professional (PSF) as well as a workstation infrastructure managed by ING Luxembourg and/or ING Bank NV (Netherlands) allowing a secure working environment including emails, the directory of operating services, the management of computers and mobile phones, file servers and centralised second-line helpdesk.</p> <p>Provision through a cloud infrastructure managed by ING Bank NV (the Netherlands) of technological and application infrastructure elements to manage a data warehouse.</p>	<p>The data transferred concern the emails, the directory of operating services and the management of mobile phones belonging to ING Lease staff.</p> <p>The personal data of customers that can be transferred are: name, email address, email content, telephone number, company names and attachments.</p> <p>The data transferred to the private cloud computing infrastructure are the same as those mentioned in the KYC and credit risk management services.</p>	<p>In this context, certain information may be made available on a confidential basis to a Financial Sector Professional (PSF) located in Luxembourg as well as to ING Luxembourg, ING Bank NV (the Netherlands) and/or their partners in Poland, Portugal, and Ireland.</p> <p>The infrastructure platform and data are hosted on a Microsoft Azure cloud platform* with servers located in the European Union, Austria, Finland, Ireland and the Netherlands.</p> <p>Regarding the private cloud operated by ING Bank NV (the Netherlands), only ING Lease and/or ING Luxembourg employees have access to the stored data.</p>
<p>Services related to the printing and management of customer documents</p>	<p>Layout, printing and digitisation of customer documents service.</p>	<p>The transferred data concern all customer data present in the customer documents and lease agreements, including surname and first name, address, account number and data relating to the lease agreement(s) or guarantors.</p>	<p>In this context, certain information may be made available on a confidential basis to ING Luxembourg, to a Financial Sector Professional (PSF) located in Luxembourg as part of the switch to paperless documents and printing, as well as to ING Belgium for the layout of different types of customer documents.</p>
<p>Credit risk management service</p>	<p>Centralised orchestration and storage of financing applications and decisions (whether during leasing or financing application or during its lifetime), determination of credit limits and credit exposures per customer.</p> <p>Monitoring and modelling of credit and market risks, internal and external credit risk reporting under different market conditions (scenarios).</p>	<p>The data transferred concern all the customer's data relating to a financing or lease application, a modification or any other event related to the financing/lease life cycle as well as any supporting documentation.</p> <p>This information includes, in particular, the identity of the customer (or of the guarantor), the purpose to be financed, the ownership structure and the identity of the customer's (or of the guarantor's) investors, the necessary checks so that ING Lease can know its customer, the financial data of the customer or of the guarantors (such as balance sheet, renewal, number of employees, performance), securities and guarantees and any other information held by ING Lease or by ING Luxembourg (such as the credit or debit balance, the existence of credit facilities or other financing</p>	<p>In this context, certain information may be made available on a confidential basis to ING Luxembourg, and to ING Bank NV, in the Netherlands, or its branches or subsidiaries worldwide, including in Belgium, Slovakia and Poland</p>

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		granted as well as their outstanding amounts).	
Market risk management services	Monitoring and modelling of market risks in general, internal reporting and export of interest rate and liquidity risks from ING Lease.	The data transferred are financial in nature, including customer reference, contract number, schedules, typology and characteristics of the products or financing subscribed, etc.	In this context, certain information may be made available on a confidential basis to ING Luxembourg, ING Bank NV in the Netherlands or its subsidiary in Belgium.
Digital Communication Channels	Provision of secure digital communication channels (video conference, audio call, chat and messaging). These channels use services in the Internet Cloud.	The data transferred concern the information necessary to establish communication: <ul style="list-style-type: none"> • IP address • Telephone number • Email address • Photo or video • ING contact's technical ID Communications are recorded and stored by ING and may be used as evidence in accordance with the applicable General Terms and Conditions. The Cloud service operator has access to technical data only depending on the channel (and not to the decrypted content of communications): <ul style="list-style-type: none"> • IP address • The encrypted content of the message (for which only ING has the decryption keys) during the communication period; before being deleted at the end of the call. 	In this context, certain information may be made available on a confidential basis to ING Luxembourg, ING Bank NV and/or their subcontractors in the Netherlands, Belgium or Poland. The infrastructure platform and data will be hosted in an Amazon Web Services (AWS) cloud platform* located in the European Union in Ireland and Germany. Regarding the private cloud operated by ING Bank NV (the Netherlands), only ING Luxembourg and ING Lease employees have access to the data stored there.
Customer relations management services	To record, view and share information provided by the customer or any other information in connection with the customer on centralised platforms with ING Bank NV and its subsidiaries worldwide, in order to improve customer service.	The data transferred include, but are not limited to: <ul style="list-style-type: none"> • The customer's data, in particular its identity, address, owner structure, city and country of incorporation. • Data of the customer's contact persons including name, address, position, date of birth and contact data, namely telephone number, email address, LinkedIn profile or other. • Data on interactions with the customer such as meeting minutes, participation in campaigns or events. • Product characteristics such as credit or market risk limits, unpaid balances, account numbers or contracts entered into. 	In this context, certain information may be made available on a confidential basis to ING Luxembourg, ING Bank NV in the Netherlands and/or its subsidiaries or branches worldwide. ING uses the SFDC Ireland Ltd (Salesforce) platform hosted in an Amazon Web Services (AWS) cloud*. The data remain in databases located in the European Union, and in particular in France, Ireland and Germany.

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<p>Marketing event management service</p>	<p>Use of an external platform where guests, customers and prospects can register electronically for marketing events organised by ING Lease.</p>	<p>The data transmitted concern the following identification data (encoded directly) by the person registering for such a marketing event online in response to his/her invitation:</p> <ul style="list-style-type: none"> • Surname • First name • Name of company for legal entities • Email address • Telephone number (optional) 	<p>In this context, certain information may be made available on a confidential basis to ING Luxembourg, ING Bank NV in the Netherlands or its subsidiary in Belgium and its partner Via Futura Bvba established in Belgium.</p> <hr/> <p>The data will be stored in a database hosted on an Amazon Web Services (AWS) cloud platform* whose servers are located in the European Union, Belgium and the Netherlands and the United States regarding the email address.</p>
<p>Signature sharing platform service</p>	<p>Use of a platform to collect electronic signatures related to legal documentation between ING Lease and its customers.</p>	<p>The data transferred are, inter alia, the documents to be signed, the first name and surname of each signatory, his/her position, his/her link with the legal entity for which he/she is acting, his/her telephone number (to be able to send text messages) and his/her email address.</p>	<p>In this context, certain information may be made available on a confidential basis 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>Financing administrative management service</p>	<p>Operational processes related to ING Leasing's front office and back office activities such as entering customer financing data for tools related to financial analysis, checking the authority of signatories of credit documentation and other related contractual documents, creating risk rating proposals, monitoring the commitments of customers and guarantors and periodically reviewing financing operations.</p>	<p>The data submitted shall include all information relating to applications for financing and contracts entered into in this context, the assets financed or the guarantors and guarantees granted and all supporting documentation.</p> <p>This information includes, in particular, the identity of the customer (or guarantors), the purpose to be financed, the ownership structure of the customer, the identity of the investors, information concerning KYC reasonable efforts, the data of the signatories, the financial data of the customer (or the guarantors) (balance sheet, turnover, number of employees, performance) and any other financial information kept by ING Lease in relation to the customer (or guarantors) (credit-debit balance sheet, existing credit facilities or other financing granted by ING Lease or other ING entities and their outstanding amounts).</p>	<p>In this context, certain information may be made available on a confidential basis to ING Luxembourg, ING Bank NV in the Netherlands, and/or its subsidiaries or branches worldwide, including in particular Belgium, Poland, Romania, Slovakia, the Philippines and Sri Lanka.</p> <p>Certain data may also be accessed by Acuity Knowledge Partners in Sri Lanka as a subcontractor of ING Bank's branch in Sri Lanka.</p>

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<p>Control activities</p>	<p>Control of ING Lease's activities, compliance with ING's internal procedures and production of Audit reports to meet regulatory requirements.</p>	<p>The data which may be transferred concern all the customer's and guarantors' data included in a contract or financing or any other event related to the life cycle of the product as well as any supporting documents, including, but not limited to, surname and first name, address, email address and contract number.</p>	<p>Certain data may thus be made available to ING Luxembourg or ING Bank NV or ING Belgium.</p>
<p>Dispute management and debt collection services</p>	<p>Assistance and management of any type of litigation or dispute in the context of lease agreements or default on payment, including claims, debt collection or any other right or financial benefits in favour of ING Lease.</p>	<p>The data transferred concerns all the data of the customer and guarantors in the context of a contract or guarantors' financing included in a contract or financing or any other event related to the life cycle of the subscribed product as well as any supporting documents.</p>	<p>In this context, certain information may be made available on a confidential basis to ING Luxembourg S.A. Bank NV in the Netherlands or its subsidiaries in Poland and/or to their partner(s) Thales (or its subsidiaries) in Luxembourg or in the country of residence of the lessee to recover debts and/or leased equipment and/or to manage the dispute in France and/or in Germany.</p>

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