

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

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

	Description of the service	Type of shared data	Access to the data
PSD2 and other financial Services subscribed by the Client from time to time	<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 regarding payment services.</p> <p>To enable and support national and/or international products or services subscribed by the Client, 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 client.</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>
KYC Services	<p>To perform in a centralised manner 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 service provider appointed by ING for the media screening Regulatory DataCorp Ltd (or any other entity of its group) are the name, surname, date of birth and country of residence.</p>	<p>In this context, some information may be made available in a confidential manner to ING Bank NV and/or to its subcontractors in The Netherlands or Poland, Slovakia, Philippines and/or to its subsidiaries or branches worldwide.</p> <p>Some data relating to customer media screening may be accessible to the service provider in the UK. The application and the results of the customer media screening will be stored in the service provider cloud databases hosted by Amazon Web Services (AWS)* whose data centres are located in Ireland and Germany.</p>
Payment Services	<p>To process payment operations 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 operations or messages.</p>	<p>The data transferred relate to all the data included in the various fields in the messages or Swift payment systems, including but not limited to: the Customer’s identity, his address, his IBAN, his account balance, the activity on the accounts, the identity</p>	<p>In this context, some information may be made available in a confidential manner to ING Belgium and/or to its subcontractors in the Netherlands, Poland or Slovakia.</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.

		of the instructing parties or beneficiaries of payment operations and all the details of such operations in general.	
Tech Service	First-level IT assistance to the ING users.	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.	In this context, certain information may be made accessible confidentially to a Financial Sector Professional (FSP) located in Luxembourg.
IT infrastructure services	<p>Employees work station 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 concerns 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 and credit and market risks management services.</p>	<p>In this context, some limited information may be made available in a confidential manner to ING Bank NV (Netherlands) and/or to its partners in Poland, I and Ireland.</p> <p>The Bank's platforms, applications and data will remain in the European Union Data Centers of Microsoft Azure (cloud)* which are located in Austria, Finland, Ireland, and Netherlands.</p> <p>Regarding the ING private cloud managed by ING Bank NV, only Luxembourg ING's employees have access to these data.</p>
Services relating to account statements	Account statement formatting and printing service.	The data transferred concern the name and the first name, the address, the account number, the movements and the balance of the accounts.	In this context, certain information may be made accessible in a confidential manner to a Financial Sector Professional (FSP) located in Luxembourg, and ING Belgium for the formatting of any type of customer mailings.
Credit Risk Management Services	<p>Orchestrating and storing credit decisions centrally, determining credit limits and exposure per customer</p> <p>Modelling, monitoring of credit risks in general, internal and external reporting of the bank's credit risks exposure under "business as usual" as well as under stress conditions.</p>	<p>The data transferred include all the information relating to credit applications and supporting documentation.</p> <p>It includes notably, the identity of the Customer, the object being financed, the Customer's ownership structure, the identity of investors, know your customer due diligence information, financial data of the Customer (such as balance sheet, turnover, number of employees, performance) and any other financial information held by the Bank in relation to the Customer (such as credit or debit balance, existing credit facilities or other loans granted by the Bank and their outstanding amounts).</p>	In this context, some information may be made available in a confidential manner to ING Bank NV in the Netherlands, Belgium, Poland and/or to its subsidiaries or branches worldwide.
Market Risk Management Services	Modelling and monitoring of the market risks in general, internal reportings and exporting of the bank's interest rate tradings risks and liquidity risks.	The data transferred are of a financial nature: customer reference, account number, account balance, timetables, type and characteristics of the products subscribed to, remuneration conditions, etc.	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>My ING - Home Banking</p>	<p>To offer a self-service web-banking platform on mobile and web applications.</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 • 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) • External Account Aggregation • Secured messaging • Electronic documents 	<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 or Poland.</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"> • data of the Customer, 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, 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. The data remain in the European Union data centers located a.o. in Ireland, France and Germany.</p>
<p>Central services linked to transactions on Financial Markets</p>	<p>All financial market transactions are recorded in ING Bank NV centralized platforms which enables the Bank to better serve the Customer and to perform the related regulatory monitoring and controls centrally, including without limitation for EMIR or MIFIR regulations.</p>	<p>The data transferred include data of the Customer entities, notably the legal entity name, Legal Entity Identifier, contact e-mails and transactions 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 to its subsidiaries or branches in Belgium, Slovakia and Philippines.</p>

<p>Sharing signature platform services</p>	<p>Use of a platform for collecting electronic signatures of legal documentation between the Bank and its Clients</p>	<p>The data transferred are among others the document to be signed, the name and surname of each signatory, his/her function, the link with the corporate entity for which he/she is acting, phone number (for allowing sending sms) and email address.</p>	<p>In this context, some information may be made available in a confidential manner to a cloud based service from Adobe hosted with Amazon Web Services (AWS)*. The data will remain in the European Union, in the data centers of AWS in Frankfurt and Dublin.</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 signatories powers, creation of risk rating proposals, monitoring of covenants and periodic credit reviews.</p>	<p>The data transferred include all the information relating to credit applications and supporting documentation. It includes notably, the identity of the Customer, the object being financed, the Customer's ownership structure, the identity of investors, know your customer due diligence information, signatories data, financial data of the Customer (such as balance sheet, turnover, number of employees, performance) and any other financial information held by the Bank in relation to the Customer (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>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. Some data may also be accessed by Acuity Knowledge Partners in Sri Lanka as sub-contractor of the branch of ING Bank NV located in Sri Lanka.</p>

* However, based on the US applicable laws and link of shareholding of the service provider with the US, it cannot be excluded that the data might be exceptionally accessed by the US competent authorities.