

Privacy notice Private Equity Belgium

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The protection of your personal data is important to the BNP Paribas Group.

This Privacy Notice provides you with detailed information relating to the protection of your personal data by BNPP FPE Belgium 45653, with its head office at Montagne du Parc/Warandeborg 3, 1000 Brussels ("we").

We are responsible, as a controller, for the processing of your personal data in relation to our activities. The purpose of this Privacy Notice is to inform you which of your personal data we use, the reasons why we use and share such data, how long we keep it and how you can exercise your rights.

Further information may be provided where necessary when you apply for a specific product or service.

1. Are you subject to this privacy notice?

This Privacy Notice applies to you if you are ("You"):

- One of our customers or in a contractual relationship with us (e.g., as a guarantor or co-borrower);
- A member of our customer's family and/or household. Indeed, our customers may occasionally share with us information about their family when it is necessary to provide them with a product or service or to get to know them better;
- A person interested in our products or services when you provide us with your personal data (in an agency, on our websites and applications, during events or sponsorship operations) so that we can contact you.
- A (legal) representative of our client;
- A beneficiary of a payment made by our client;
- A beneficial owner of our client;
- A debtor of our client (e.g. in case of bankruptcy of our client);
- A shareholder of our client;
- A member of our client's staff.

When you provide us with personal data related to other people, please make sure that you inform them about the disclosure of their personal data and invite them to read this Privacy Notice.

2. How can you control the processing activities we do on your personal data?

You have rights which allow you to exercise real control over your personal data and how we process them. We draw your attention to the fact that these rights may be limited where regulations so provide. This is the case with the regulations relating to the fight against money laundering and the financing of terrorism, which prohibit us from allowing you to exercise your various rights with regard to your personal data processed for this purpose.

If you wish to exercise the rights listed below, please submit a request by post addressed to BNP Paribas Fortis SA – Data Privacy Office – 1GA2W, Montagne du Parc/Warandeborg 3, 1000 Brussels or via Easy Banking Web or app [1], with a scan/copy of your identity card. You can also call the Easy Banking Centre or visit one of our branches.

If you have any questions relating to our use of your personal data under this Privacy Notice, please contact our Data Protection Officer at the following address BNP Paribas Fortis SA – Data Privacy Office – 1GA2W, Montagne du Parc/Warandeborg 3, 1000 Brussels or by sending us an e-mail to privacy@bnpparibasfortis.com.

2.1. You can request access to your personal data

You can directly access some data from your client account on our Easy Banking Web website or via the Easy Banking App mobile application.

If you wish to have access to your personal data, we will provide you with a copy of the personal data you requested as well as information relating to their processing.

2.2. You can ask for the correction of your personal data

Where you consider that your personal data are inaccurate or incomplete, you can request that such personal data be modified or completed accordingly. In some cases, supporting documentation may be required.



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2.3. You can request the deletion of your personal data

If you wish, you may request the deletion of your personal data, to the extent permitted by law.

2.4. You can object to the processing of your personal data based on legitimate interests

If you do not agree with a processing activity based on a legitimate interest, you can object to it, on grounds relating to your particular situation, by informing us precisely of the processing activity involved and the reasons for the objection. We will cease processing your personal data unless there are compelling legitimate grounds for doing so or it is necessary for the establishment, exercise or defence of legal claims.

2.5. You can object to the processing of your personal data for commercial prospecting purposes

You have the right to object at any time to the processing of your personal data for commercial prospecting purposes, including profiling, insofar as it is linked to such prospecting.

2.6. You can suspend the use of your personal data

If you question the accuracy of the personal data we use or object to the processing of your personal data, we will verify or review your request. You may request that we suspend the use of your personal data while we review your request.

2.7. You have rights against an automated decision

As a matter of principle, you have the right not to be subject to a decision based solely on automated processing based on profiling or otherwise that has a legal effect or significantly affects you. However, we may automate such a decision if it is necessary for the entering into or performance of a contract with us, authorised by regulation or if you have given your consent.

In any event, you have the right to challenge the decision, express your views and request the intervention of a competent person to review the decision.

2.8. You can withdraw your consent

If you have given your consent to the processing of your personal data, you can withdraw this consent at any time.

2.9. You can request the portability of part of your personal data

You may request a copy of the personal data that you have provided to us in a structured, commonly used and machine-readable format. Where technically feasible, you may request that we transmit this copy to a third party.

2.10. How to file a complaint with the Data Protection Authority?

In addition to the rights mentioned above, you may lodge a complaint with the competent supervisory authority, which is usually the one in your place of residence. In Belgium, this is the Data Protection Authority.

[1] via the settings of your Easy Banking Web or App (for your right of access, right to rectification, right of consent and right to data portability)

3. Why and on which legal basis do we use your personal data?

In this section we explain why we process your personal data and the legal basis for doing so.



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3.1. Your personal data are processed to comply with our various regulatory obligations

Your personal data are processed where necessary to enable us to comply with the regulations to which we are subject, including banking and financial regulations.

3.1.1. We use your personal data to:

- Monitor operations and transactions to identify those which deviate from the normal routine/patterns (e.g., when you withdraw a large sum of money in a country other than your place of residence);
- Monitor your transactions to manage, prevent and detect fraud;
- Manage and report risks (financial, credit, legal, compliance or reputational risks etc.) that the BNP Paribas Group could incur in the context of its activities;
- Record, in compliance with the Markets in Financial Instruments Directive (MiFID 2), communications in any form relating to, at the very least, transactions performed within proprietary trading and the provision of services relating to clients' orders, in particular their receipt, transmission and execution;
- Assess the appropriateness and suitability of the investment services provided to each client in compliance with the Markets in Financial Instruments regulations (MiFID 2);
- Assist the fight against tax fraud and fulfil tax control and notification obligations;
- Assess your level of credit risk and your ability to repay when you borrow;
- Record transactions for accounting purposes;
- Prevent, detect and report risks related to Corporate Social Responsibility and sustainable development;
- Detect and prevent bribery;
- Comply with the provisions applicable to trust service providers issuing electronic signature certificates;
- Exchange and report different operations, transactions or orders or reply to an official request from a duly authorized local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, law enforcement, state agencies or public bodies.

3.1.2. We also process your personal data for anti-money laundering and countering of the financing of terrorism purposes

As part of a banking Group, we must have a robust system of anti-money laundering and countering of terrorism financing (AML/TF) in each of our entities managed centrally, as well as a system for applying local, European and international sanctions.

In this context, we are joint controllers with BNP Paribas SA, the parent company of the BNP Paribas Group (the term "We" in this section also includes BNP Paribas SA).

The processing activities performed to meet these legal obligations are detailed in [appendix 1](#).

3.2. Your personal data are processed to perform a contract to which you are a party or pre-contractual measures taken at your request

Your personal data are processed when it is necessary to enter into or perform a contract to:

- Define your credit risk score and your reimbursement capacity;
- Evaluate (e.g., on the basis of your credit risk score) if we can offer you a product or service and under which conditions (e.g., price);
- Provide you with the products and services subscribed to under the applicable contract;
- Manage existing debts (identification of customers with unpaid debts);
- Respond to your requests and assist you;
- Assist you in the management of your budget by the automatic categorization of your transaction data;
- Ensure the settlement of your succession.



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3.3. Your personal data are processed to fulfil our legitimate interest or that of a third party

Where we base a processing activity on legitimate interest, we balance that interest against your interests or fundamental rights and freedoms to ensure that there is a fair balance between them. If you would like more information about the legitimate interest pursued by a processing activity, please contact us using the contact details provided under section 2 "HOW CAN YOU CONTROL THE PROCESSING ACTIVITIES WE DO ON YOUR PERSONAL DATA?" above.

3.3.1. In the course of our business as a bank-insurer, we use your personal data to:

- Manage the risks to which we are exposed:
 - We keep proof of operations or transactions, including in electronic evidence;
 - We carry out the collection of debts;
 - We handle legal claims and defences in the event of litigation;
 - We develop individual statistical models in order to help define your creditworthiness and risk profile.
- Enhance cyber security, manage our platforms and websites, and ensure business continuity.
- Use video surveillance to prevent personal injury and damage to people and property.
- Enhance the automation and efficiency of our operational processes and customer services (e.g., automatic filling of complaints, tracking of your requests and improvement of your satisfaction based on personal data collected during our interactions with you such as phone recordings, e-mails or chats, using these interactions to train our staff).
- Carry out financial operations such as debt portfolio sales, securitizations, financing or refinancing of the BNP Paribas Group.
- Conduct statistical studies and develop predictive and descriptive models for:
 - Commercial purposes: to identify the products and services that could best meet your needs, to create new offers or identify new trends among our customers, similarities in behaviour, to develop our commercial policy taking into account our customers' preferences, to derive observations (e.g. aggregated consumption patterns) that we can offer in the market;
 - Scientific and related purposes : to contribute to academic projects as well as to private and public projects including micro- or macro-economic analysis for the benefit of the Society in particular;
 - Safety purpose: to prevent potential incidents and enhance safety management;
 - Compliance purpose (e.g., anti-money laundering and countering the financing of terrorism) and risk management;
 - Anti-fraud purposes.
- Organize contests, lotteries, promotional operations, conduct opinion and customer satisfaction surveys;
- Know your family environment on the basis of products you have in common with members of your family and/or household, your own statements or those of a member of your family and/or household;
- Follow up our agreements with external partners when you approach them directly and they subsequently inform us.

3.3.2. We use your personal data to send you commercial offers by electronic means, post and phone

As part of the BNP Paribas Group, we want to be able to offer you access to the full range of products and services that best meet your needs.

Once you are a customer and unless you object, we may send you these offers electronically for our products and services and those of the Group if they are similar to those you have already subscribed to.

We will ensure that these commercial offers relate to products or services that are relevant to your needs and complementary to those you already have to ensure that our respective interests are balanced.

We may also send you, by phone and post, unless you object, offers concerning our products and services as well as those of the Group and our trusted partners.

3.3.3. We analyse your personal data to perform standard profiling to personalize our products and offers

To enhance your experience and satisfaction, we need to determine to which customer group you belong. For this purpose, we build a standard profile from relevant data that we select from the following information:

- What you have directly communicated to us during our interactions with you or when you subscribe to a product or service;



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- Resulting from your use of our products or services such as those related to your accounts including the balance of the accounts, regular or atypical movements, the use of your card abroad as well as the automatic categorization of your transaction data (e.g., the distribution of your expenses and your receipts by category as is visible in your customer area);
- From your use of our various channels: our websites, applications and social networks (e.g., if you are digitally savvy, if you prefer a customer journey to subscribe to a product, or service with more autonomy (selfcare));

Unless you object, we will perform this customization based on standard profiling. We may go further to better meet your needs, if you consent, by performing a tailor-made customization as described below.

3.3.4. We record electronic communications data

In addition to recordings of electronic communications permitted or required by law or to which you have consented, we may record electronic communications to which you are a party, including traffic data, in the course of lawful business transactions in order to:

- Train and monitor our employees and improve the quality of our services;
- Provide evidence of business transactions or dealings that have taken place in the course of those electronic communications, including the content of those communications (including any advice we give).

We retain records of electronic communications for as long as required or permitted by law, including for the period in which a dispute relating to those communications may arise.

This applies to both telephone conversations and electronic communications (such as e-mails, SMS, instant messaging or other similar technology) that you have with our call centre, (independent) branches, private banking and business centres, dealing rooms or one of our representatives.

3.4. Your personal data are processed if you have given your consent

For some processing of personal data, we will give you specific information and ask for your consent. Of course, you can withdraw your consent at any time.

In particular, we ask for your consent for:

- Tailor-made customization of our offers and products or services based on more sophisticated profiling (inferred from your current behaviours, skills and preferences) to anticipate your needs and behaviours;
- Any electronic offer for products and services not similar to those you have subscribed to or for products and services from our trusted partners;
- Use of your navigation data (cookies) for commercial purposes or to enhance the knowledge of your profile.

You may be asked for further consent to process your personal data where necessary.

4. What types of personal data do we collect?

We collect and use your personal data, meaning any information that identifies or allows one to identify you.

Depending among others on the types of product or service we provide to you and the interactions we have with you, we collect various types of personal data about you, including:

- **Identification information:** e.g., full name, gender, place and date of birth, nationality, identity card number, national register number (in compliance with the relevant regulations), passport number, driving licence number, vehicle registration number, photograph, signature);
- **Contact information:** (private or professional) postal address, e-mail address, phone number;
- **Information relating to your financial and family situation:** e.g., marital status, matrimonial regime, number of children and age, study or employment of children or yourself, composition of the household, property you own: apartment or house;
- **Milestones of your life:** e.g., you recently got married, divorced, partnered, or gave birth;
- **Lifestyle:** hobbies and interests, travel, your environment (nomadic, sedentary);
- **Economic, financial and tax information:** e.g., tax ID, tax status, country of residence, salary and other income, value of your assets;
- **Education and employment information:** e.g., level of education, employment, employer's name and remuneration;



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- **Banking and financial information related to the products and services you hold:** e.g., bank account details, products and services owned and used (credit, insurance, savings and investments, leasing, home protection), credit card number, money transfers, assets, profile of declared investor, credit history, payment incidents;
- **Transaction data:** account movements and balances, transactions including beneficiary's data such as full names, addresses and contact details as well as details of bank transactions, amount, date, time and type of transaction (bank card, transfer, cheque, direct debit);
- **Data relating to your habits and preferences in relation to the use of our products and services;**
- **Data collected from our interactions with you:** your comments, suggestions, needs collected during our exchanges with you in person in our Agencies (reports) and online during phone communications (conversation), discussion by e-mail, chat, chatbot, exchanges on our social media pages and your latest complaints, your connection and tracking data such as cookies and tracers for non-advertising or analytical purposes on our websites, online services, applications, social media pages;
- **Data collected from the video protection system (including CCTV) and geolocation:** e.g., showing locations of withdrawals or payments for security reasons, or to identify the location of the nearest branch or service suppliers for you;
- **Data about your devices (mobile phone, computer, tablet, etc.):** IP address, technical specifications and uniquely identifying data;
- **Personalized login credentials or security features used to connect you to the BNP Paribas website and apps.**

We may collect sensitive data such as health data, biometric data, or data relating to criminal offences, subject to compliance with the strict conditions set out in data protection regulations.

5. Who do we collect personal data from?

We collect personal data directly from you; however, we may also collect personal data from other sources.

We sometimes collect data from public sources:

- Publications/databases made available by official authorities or third parties (e.g., the Belgian State Gazette, the Crossroads Bank for Enterprises, databases managed by the supervisory authorities of the financial sector);
- Websites/social media pages of legal entities or business clients containing information that you have disclosed (e.g., your own website or social media page);
- Public information such as that published in the press.

We also collect personal data coming from third parties:

- From other BNP Paribas Group entities;
- From our customers (companies or individuals);
- From our business partners;
- From service providers of payment initiation and account aggregators (service providers of account information);
- From third parties such as credit reference agencies and fraud prevention agencies;
- From data brokers who are responsible for ensuring that they collect relevant information in a lawful manner.

6. Who do we share your personal data with and why?

6.1. With BNP Paribas Group's entities

As a member of the BNP Paribas Group, we work closely with the Group's other companies worldwide. Your personal data may therefore be shared between BNP Paribas Group entities, where necessary, to:

- Comply with our various legal and regulatory obligations described above;
- Fulfil our legitimate interests and those of the entities of the BNP Paribas Group, which are:
 - Managing, preventing, detecting fraud;
 - Conducting statistical studies and develop predictive and descriptive models for business, security, compliance, risk management and anti-fraud purposes;
 - Enhancing the reliability of certain data about you held by other Group entities;
 - Offering you access to all the Group's products and services that best meet your needs and wishes;
 - Customizing the content and prices of products and services;
 - Optimising the management of common customers and the customer experience;



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- Assisting each other in fulfilling our legal, regulatory and contractual obligations in the course of our business.

6.2. With recipients outside the BNP Paribas Group and processors

In order to fulfil some of the purposes described in this Privacy Notice, we may, where necessary or provided for in our services, share your personal data with:

- Processors which perform services on our behalf e.g., IT services, logistics, printing services, telecommunication, debt collection, advisory and distribution and marketing;
- Banking and commercial partners, independent agents, intermediaries or brokers, financial institutions, counterparties, public services, trade repositories with which we have a relationship if such transmission is required to allow us to provide you with the services and products or execute our contractual obligations or transaction (e.g., banks, correspondent banks, depositaries, custodians, issuers of securities, paying agents, exchange platforms, insurance companies, payment system operators, issuers or payment card intermediaries, mutual guarantee companies or financial guarantee institutions);
- Local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, public authorities or institutions (such as the National Bank of Belgium, FSMA, Caisse des dépôts et des Consignations), to which we, or any member of the BNP Paribas Group, are required to disclose pursuant to:
 - Their request;
 - Our defence, action or proceeding;
 - Complying with a regulation or a recommendation issued from a competent authority applying to us or any member of the BNP Paribas Group;
- Service providers of third-party payment (information on your bank accounts), for the purposes of providing a payment initiation or account information service that you have taken out with them;
- Certain regulated professions such as lawyers, notaries, or auditors when needed under specific circumstances (litigation, audit, etc.) as well as to our insurers or to an actual or proposed purchaser of the companies or businesses of the BNP Paribas Group;
- Universities and public and/or private scientific institutions.

7. What are your rights and how can you exercise them?

In accordance with applicable regulations, you have the following rights:

- **To access:** you can obtain information relating to the processing of your personal data, and a copy of such personal data.
- **To rectify:** where you consider that your personal data are inaccurate or incomplete, you can require that such personal data be modified accordingly.
- **To erase:** you can require the deletion of your personal data.
- **To restrict:** you can request the restriction of the processing of your personal data.
- **To object:** you can object to the processing of your personal data, on grounds relating to your particular situation. You have the absolute right to object to the processing of your personal data for direct marketing purposes, which includes profiling related to such direct marketing.
- **To withdraw your consent:** where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time.
- **To data portability:** where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party.

If you wish to exercise one of the rights listed above, please send a letter or e-mail to the following address: BNPP FPE Belgium 45653, Montagne du Parc/Warandenberg 3, 1000 Brussels, or fi.peq@bnpparibasfortis.com. Please include a scan/copy of your identity card for identification purposes.

In accordance with applicable regulation, in addition to your rights above, you are entitled to lodge a complaint with the competent supervisory authority.

8. How long do we keep your personal data?

For more information on retention periods, see [annex 3](#).



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9. How to contact us?

Should you have any questions relating to our use of your personal data or this Privacy Notice, please contact us by email to fi.peq@bnpparibasfortis.com or by letter to BNPP FPE Belgium 45653, Montagne du Parc/Warandeborg 3, 1000 Brussels, and we will investigate your query.

