

Your privacy
is important
to us.



Data Protection Statement KBC Securities NV

This Data Protection Statement comes into effect on 1 July 2019.

As to the choice of 'personalised information' (see part 3), on 1 April 2018.

Detailed changes further to the General Data Protection Regulation of 25 May 2018.

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Part 1: We must work together to safeguard your privacy.

Protection of your data is very important to us. Our aim is to process your personal data in a manner that is lawful, appropriate and transparent. In this Data Protection Statement, we explain which of your personal data we collect from you as person, and then process.

Throughout this document, this means details of you as customer, a possible future customer or other affected party, such as a payee, company contact or representative. Regardless of what capacity you act in, your rights do not change and KBC Securities will treat your data with equal care.

1.1 Make sure you read all of this information and look at what action is open to you.

We recommend that you read this information carefully, so that you know what KBC Securities uses your data for. This Data Protection Statement also contains more information about your privacy rights and how you can exercise them.

KBC Securities may amend this Data Protection Statement. The most recent version can always be found at <https://data.kbcsecurities.be/articles/privacy>. KBC Securities will inform you of all substantive changes to the terms of the Data Protection Statement via its website or other possible communication channels.

You will find more information about the Belgian data protection legislation on the website of the Belgian Data Protection Authority (previously called the Privacy Commission) at www.dataprotectionauthority.be.

1.2 KBC Securities and the other members of the KBC group take care in how they handle your personal data.

KBC Securities NV is a securities firm that operates in Belgium and Hungary. KBC Securities NV has its registered office at Havenlaan 2, 1080 Brussels. KBC Securities is part of the KBC group (also 'KBC' in the following), which is an 'integrated bank-insurance group' (a group of companies that, through close cooperation, create and distribute banking, investment and insurance products, and provide financial services).

The KBC group principally focuses on retail customers, SMEs and high-net-worth customers, and mainly operates in Belgium, the Czech Republic, Slovakia, Hungary, Bulgaria and Ireland. Aside from that, KBC also operates via companies and establishments in a selection of countries within and outside the European Union. Outside the European Union, KBC Securities is also active in the United States of America via KBC Securities USA, LLC an entity affiliated with the KBC group.

Members of the KBC group in Belgium include KBC Group NV, KBC Bank NV, CBC Banque SA, KBC Insurance NV, KBC Asset Management NV, KBC Securities NV, KBC Autolease NV and KBC Lease Belgium NV. The names of some Belgian companies in the KBC group, such as Groep VAB NV and Omnia NV, do not contain 'KBC' as an element. More information on the activities of the KBC group is available at www.kbc.com.

KBC Securities is the data controller of personal data in the context contemplated in this Data Protection Statement.

If there are good reasons for doing so, such as are explained in this part 3, KBC Securities may also make data available to other KBC entities, whether in Belgium or elsewhere, or it can process it if it has been collected lawfully from another KBC entity (in Belgium or elsewhere). Naturally, this is only possible provided there is no legal impediment, such as a confidentiality obligation or a provision of the data protection legislation. Information exchanges concern not just personal data but also the information on legal persons, such as for the reasons listed in part 3. The practice of exchanging information on legal persons is particularly justified by KBC's desire to provide the support services it does in a manner that is efficient, mainly because its doing so means that each KBC group entity has the same overview of the customer relationship, complete to the same extent, and that they are all able to issue messages of a commercial nature explaining the KBC group's financial services and products.

1.3 Contact KBC Securities if you have any questions about the processing of your data.

If you have any questions about privacy or if you would like to change your privacy settings or exercise your rights, you can contact KBC Securities in the following ways:

- You can send a letter to KBC Securities, Havenlaan 2, 1080 Brussels;
- You can send an e-mail to compliancegroup@kbcsecurities.be.

If you wish to exercise your rights, or if KBC Securities has other reasons that require KBC Securities to verify your identity, you will be required to submit a copy of your ID card to verify your identity.

Part 2: Your right to privacy.

You have a lot of rights when it comes to the processing of your data. When KBC Securities asks for your consent to process your data, you can subsequently withdraw that consent again any time you wish.

2.1 You can inspect your data.

You can inspect the data that KBC Securities processes about you at any time.

If you exercise your right of inspection, KBC will give you as complete a list as possible of your data. Personal data that the customer can consult via the normally available channels like applications or specific platforms will not necessarily be reiterated here. It can also happen that some personal data from files such as the usual back-up files, logs and stored/archived records is not included in that list. Such is not data that is processed on an

ongoing basis and it is not therefore immediately available. For that reason, it will also not be communicated to you. However, it is removed in accordance with standard data maintenance procedures. The procedure for exercising your right of inspection is set out in Article 2.8 of this Data Protection Statement. In order to exercise the right, you must use the standard letter provided for this purpose to enable us to respond as accurately as possible and to provide you with the correct data. The standard letter is available at www.kbcsecurities.com.

2.2 You can have your data corrected.

It can happen that certain information that KBC Securities holds concerning you is not or no longer correct. You can ask for these data to be rectified or completed at any time. The procedure for having your data corrected is set out in Article 2.8 of this Data Protection Statement.

2.3 You can have your data deleted.

You can ask KBC Securities to remove your personal data at any time. Nevertheless, if KBC Securities no longer has any overriding ground for processing your personal data, KBC Securities will erase them themselves. However, statutory duties may preclude erasure. The procedure for having your data deleted is set out in Article 2.8 of this Data Protection Statement.

2.4 You can object to certain forms of processing of your data.

If you disagree with how KBC Securities invokes its legitimate interest to process certain data (see 3.4), you can object. We will heed objections unless there are overriding grounds not to do so, such as when we process data with a view to combating fraud or to comply with other legal obligations. The procedure for objecting to the use of your data is set out in Article 2.8 of this Data Protection Statement.

2.5 In some cases, you can refuse to allow your data to be processed fully automatically.

Some data processing operations and processes are fully automated, without any human intervention. KBC Securities endeavours to give an immediate explanation of the logic behind this automated process.

If you disagree with the outcome of such fully automated processes, you can contact KBC Securities. You can for example ask a KBC Securities staff member to intervene or tell them why you disagree with the assessment.

2.6 You can ask for your data to be transferred to a third party.

You are entitled to have personal data that you yourself have provided to KBC Securities with your consent or in the process of performing a contract to be transferred back to you or to a third party. The legislation imposes a number of restrictions on exercise of this right, so that it is not applicable to all your data. The procedure for exercising your right to transfer data is set out in Article 2.8 of this Data Protection Statement.

2.7 You can ask for limits to be placed on the processing of your data.

In certain situations, you can ask for limits to be placed on the processing of your data. Exercise of this right is conditional. You can exercise your right to restricted processing:

- during the period needed by KBC Securities to verify the accuracy of your personal data if you challenge the accuracy of personal data concerning you that KBC Securities processes;
- where processing is unlawful but you do not want the personal data erased;
- when KBC no longer has a purpose for processing the personal data but still needs it in connection with a legal dispute;
- pending KBC Securities' reply to whether KBC Securities' legitimate interests weigh more importantly than yours when you have exercised your right to object to processing for which KBC Securities invokes its legitimate interest as legal cause.

The procedure for asking for limits to be placed on the processing of your data is set out in Article 2.8 of this Data Protection Statement.

2.8 You can exercise your rights.

Always be as specific as possible when you wish to exercise your rights, so that KBC Securities can handle your request appropriately. In the case of your right to inspect your data, a form is provided so that you can indicate the KBC Securities service for which you want to exercise this right. You should submit this form in accordance with the procedure below. KBC Securities must also verify your identity in as much detail as possible in case someone else tries to exercise your rights. This is why we ask you to include a copy of both sides of your ID card with such a signed request.

Any time you wish to exercise a right, this must occur using a signed letter including a copy of both sides of your ID card to Compliance – KBC Securities, Havenlaan 2, 1080 Brussels.

If you have a complaint regarding the exercise of your rights, you can contact KBC Securities Compliance by sending an e-mail to compliancegroup@kbcsecurities.be or by writing a letter to KBC Securities NV, Havenlaan 2, 1080 Brussels. This is your primary point of contact in relation to privacy matters.

If you would like more information or if you do not agree with the standpoint adopted by KBC Securities, be sure to visit the website of the Belgian Data Protection Authority at www.dataprotectionauthority.be. You can also lodge complaints there.

In some cases you can also exercise your rights directly with a third party. That applies, for instance, to the databases maintained by the National Bank of Belgium (www.nbb.be) such as its Central Contact Point.

Part 3: KBC Securities has many reasons for processing your personal data.

3.1 KBC Securities has to comply with certain legal obligations.

The main legal grounds for KBC Securities having to process certain information about you are summed up here.

- Securities firms are required by law to share certain information relating to their customers and proxy holders with the Central Point of Contact of the National Bank of Belgium (www.nbb.be). This concerns in particular:
 - o the identity of their customers, the opening and closing of accounts, and powers of attorney for those accounts, including the date and the account numbers;
 - o cash transactions;
 - o the conclusion and termination of financial contracts.

This Central Point of Contact in turn holds the data after the date the information is drawn down in case it is needed by the tax authorities to facilitate any investigation into tax evasion, to verify and collect certain receipts, investigate criminal offences, combat money laundering and the funding of terrorist activities and major crimes, investigate solvency, collect data by intelligence and security services, for bailiffs in the event of attachment, and notarial searches related to tax returns for estates. Access to the information held by the Central Point of Contact is regulated by law. You will find all of the data regarding the Central Point of Contact for accounts and financial contracts in the Act of 8 July 2018, and in Section 322, Subsection 3 of the 1992 Income Tax Code and its implementing decrees.

- Securities firms are legally required to use all possible means to prevent, detect and report money-laundering and terrorism financing to the government (Belgian Financial Intelligence Processing Unit). This is a matter of considerable public interest. KBC Securities and the KBC group have to take the necessary steps to this end, at both centralised and local levels. For example, they have to gather data on customers and groups of customers or issue risk alerts. Specifically, KBC Securities has to:
 - o identify you as customer, representative or beneficial owner;
 - o verify this identity;
 - o determine your profile (including in terms of the risk posed for money laundering), to which end various personal and professional information are collated, including whether you are a politically exposed person;
 - o check your actions and transactions, and if necessary prevent and report them to the Belgian Financial Intelligence Processing Unit (CTIF-CFI).

In doing so, KBC Securities uses details given to it by you plus data that can come from other channels or public databases like Thomson Reuters's World-Check, Graydon, Dun & Bradstreet, Swift and Internet search engines.

- When verifying a customer, KBC Securities will request a recent copy of your ID card and proof of residence. In cases of electronic verification, KBC Securities ensures that it only retains the legally required information stored on your e-ID.
- In the context of the part they play in fighting terrorism and their obligations under sanctions rules, securities firms are required to screen customer details against sanctions lists. Transactions are also monitored. In some cases, underlying documents are requested and payments may be held back (see the sanctions legislation as well as EU Regulations 2580/2001 and 881/2002). Here, too, KBC Securities uses outside sources such as Thomson Reuters' World-Check.
- Securities firms are also required (including at group level) to prevent, uncover and report improper use of inside knowledge and market manipulation and to notify suspect dealings to the authorities (see Articles 16 and 17 of the Market Abuse Regulation of 16 April 2014, among other laws).
- KBC Securities can process your personal data for the purposes of checks, investigations and opinions in areas subject to compliance considerations (such as prevention of money-laundering and fraud, investor and consumer protection, and data protection).
- For payment transactions, banks and securities firms have to pass details of the originator or payee to the receiving or transferring institution regardless of where it is established (e.g., Section 3 of part VII of the Economic Law Code plus its implementing decrees).
- MiFID II (the Second European Markets in Financial Instruments Directive) requires securities firms, among others, to allocate their customers to certain categories. In principal, natural persons automatically qualify as non-business customers (or retail customers), although they can require reallocation as business customers in particular cases. Insofar as securities firms render investment advice, they are required to collect information appropriate to the relevant category on customers' knowledge and experience, financial resilience, investment objectives and attitude towards risk and return in connection with products offered to them (see the provisions transposing MiFID II, including the Act of 2 August 2002 and the Royal Decree of 3 June 2007). In addition, MiFID II requires securities firms to define the target market for the products they offer and to identify the target market for all the products they offer in their various distribution channels. In each scenario (execution only, execution with appropriateness or advice) it must be checked whether the target market of each of the products offered is appropriate for the distribution channel and the customer profile.
- Securities firms also have responsibility for identifying account holders and the beneficial owners of accounts, safes or insurance products in the context of reviving dormant accounts, safe-deposit boxes and insurance products (see the Act of 24 July 2008 and the website at www.slapendetegoeden.be to find out more).
- Securities firms are responsible for appropriately controlling risks (including at group level). They are required to detect, prevent, mitigate and address risks. These include counterparty and market risk, information management and statutory compliance risks, the risk of staff, customer and/or supplier fraud, and the risk of unethical behaviour by staff or breaches by them of their duties of care. Risk management has to be ensured at both central level (gathering data on customers and groups of customers) and local level (e.g., circulating risk alerts). In this context, all forms of risk profile are moreover stipulated (see the provisions governing credit institutions, inter alia the Credit and Stockbroking Institutions (Status and Regulation) Act of 25 April 2014 and the Insurers and Reinsurers (Status and Regulation) Act of 13 March 2016).
- Securities firms have to respond appropriately when you exercise your rights under the data protection legislation. They are also required

to answer questions from the Data Protection Authority, such as if a complaint is made.

- Securities firms also have certain reporting duties to the authorities, such as submission of transaction reports on studies into market operation and potential market abuses.
- Securities firms have to submit reports to and be able to answer questions from the financial market regulators, such as the Financial Services and Markets Authority (www.fsma.be), the National Bank of Belgium (www.nbb.be) and the European Central Bank (ECB) (in the context of the regulatory legislation, including the Act on the status and supervision of credit institutions and securities firms of 25 April 2014 and the Act of 2 August 2002, AnaCredit reporting).
- Securities firms have a duty in the event of a death to provide a summary of the deceased's assets to the government in accordance with tax legislation (e.g., the Belgian Inheritance Tax Code).
- Securities firms have to answer questions from the tax authorities or voluntarily exchange information under the tax legislation (including the Income Tax Code, the Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS)).
- Securities firms are also required to answer questions from the judicial authorities (police, public prosecutors, investigating judges and the courts).

3.2 KBC Securities must be able to assess whether an agreement or service may be contracted.

Before KBC Securities concludes a contract, it might have to process certain information in order, for instance, to process an application and to make due assessment of whether the agreement can be contracted and under what terms and conditions. For example, data-collection and processing is required prior to the opening of an account with KBC Securities, or before a mandate is given to KBC Securities, such as the processing of identification and contact details.

3.3 KBC Securities must be able to perform a contract correctly.

As customer or customer representative of KBC Securities, you make use of a number of services and your doing so renders administrative and accounting processes incumbent on KBC Securities. Examples of processing in this context are the administration of accounts, payments, transactions with financial instruments.

In order to do so, KBC Securities sometimes has to hand over certain personal data to an intermediary or counterparty like a custodian.

You can communicate with KBC Securities via several different channels, such as the website, by e-mail and by phone. In certain circumstances, KBC Securities may use the contact and security information for those or other communication channels to communicate and carry out checks. Examples include login details, passwords and certificates.

3.4 KBC Securities has to be able to function as a business.

In addition to the purposes set out above, KBC and KBC Securities as commercial undertakings have certain ulterior legitimate interests on the basis of which they process personal data. In that regard, KBC Securities always ensures that the impact on your privacy is kept to a minimum and that, in all events, KBC Securities' legitimate interests remain proportionate to the impact that upholding them has on your privacy, by introducing mitigating and/or corrective measures or restricted processing, for instance. Nonetheless, if you harbour an objection to this use being made of your data, you may exercise your right to object. KBC Securities will respect your objections unless it has compelling reasons for not doing so.

In this way, KBC Securities processes personal data based on its legitimate interest in the following situations:

3.4.13.4.1 Controls, security and measures to prevent fraud

- KBC Securities uses your personal data, including transaction details to perform studies, create models and generate statistics for various purposes, thereby severing the link with individual persons as swiftly as possible. Examples of these purposes are creating models to identify money-laundering signals, regulatory reporting, more effective internal control, fraud analysis and combating fraud, risk analysis, security and other non-commercial purposes.
- KBC sets risk alert levels as well. Risk alerts are issued when a data subject incurs loan-repayment arrears, the social security authorities sue following insolvency or after a case of fraud. Risk alerts can have the effect of precluding the data subject from taking up or continuing to take up certain products or services.
- KBC can use your personal data to prevent, detect and investigate fiscal fraud in conjunction with (Belgian) payment systems and providers of other payment services.
- KBC processes personal data, including transaction data in order to gauge your knowledge and experience in relation to investments with a view to protecting investors (MiFID).
- Personal data can be used for the administration, risk management and oversight of both KBC and KBC Securities' organisations, such as risk management (including counterparty and market risk posed by customers and counterparties), compliance (including prevention and investigation of money laundering and fraud, protection of investors and consumers, and privacy), risk functions and inspections, complaints management and internal and external audit.
- It can also be used for ascertaining, exercising and safeguarding the rights of KBC Securities or of those it represents (e.g., in disputes). We also keep personal data for the purpose of citing the evidence it constitutes if needed at a subsequent juncture. Storage may be entrusted to outside third parties.
- When applications are developed, tests need to be carried out using personal data, including the final acceptance test before an application can be put into production. KBC may process personal data in the course of investigating issues in applications.
- Data processing may be done to ensure that persons and goods are safe, de facto secure and under visual guard.

3.4.2 Commercial purposes and improving customer experience

- KBC Securities aggregates and processes your data in such a way that it no longer constitutes personal data. It is then used, for instance, to illustrate the impact on investors of a new tax. KBC Securities may at the same time carefully draw anonymised insights from personal data and subsequently offer those insights in the market.
- KBC Securities can also send you certain offers or publicity based on legitimate interest.
- KBC Securities may sometimes share your personal data, in particular your contact and identification details, with other companies of the KBC group or with third parties in the context of its activities.
- When you (i) represent a business or company, or (ii) are (professionally) active, KBC Securities can share your (professional) (contact and identification) details with other (professional) parties if KBC Securities believes it is plausible that the business or company you represent, or yourself, in the context of your activities, could be interested in these professional parties or in the financial instruments issued by them, such as, for example, in the context of the merger and acquisition activities of KBC Securities, or investment opportunities offered by such professional parties in the context of the placement or referral activity of KBC Securities.

3.4.3 Setting the KBC Securities strategy

- The personal data available to KBC Securities may also be used to create segments and more detailed profiles within the framework of differentiated service provision.
- It may be used to create synergies, raise efficiency or generate other organisational or process-related benefits.
- They can be used to support and simplify the acquisition, use and cancellation of services by customers, including avoiding your having to resubmit information you've previously provided and having to go through a full identification process again if you want to become a customer of another KBC group entity. KBC Securities can then pass your identity details to other companies in the KBC group in order to speed up their identification processes, and also to send you messages for a service you have signed up for from us, in order, say, to make it easier to use.
- Lastly, personal data can also be processed for the necessary management reporting and internal cost and income allocation.

3.5 KBC Securities uses your personal data to do direct marketing.

As a commercial enterprise, KBC Securities is keen to be able to suggest a wide range of financial products and services to you. It may do so in response to explicit requests or where it has an idea that you or the company you represent might be interested in or could benefit from a given product or service.

This information can reach you in all sorts of ways: via the internet and applications, by e-mail, by post, by phone and through events. In addition, KBC Securities likes to keep up with the constantly evolving range of new technologies. KBC Securities will do all it can to provide you with information in a clear way, and will choose the most appropriate channel, which disturbs you as little as possible.

Personalised approach: If you explicitly consent to receiving personalised information, KBC (Securities) will be able to make suggestions that are closely tailored to your individual situation. You will no longer receive lots of adverts that are of no interest to you. In this regard, KBC (Securities) uses your entire personal data (including transaction details and information obtained from third-party sources (such as financial institutions), public sources like the official gazette, the results of discussions at your branch and other contacts). These data are collated along with details of your family and business, and so on, so that KBC is really in a position to provide you with information that's tailored to you. You can withdraw your consent at any time, just as easily as you gave it.

Your consent to receiving personalised information is valid for KBC Bank, KBC Insurance, KBC Asset Management, KBC Securities, CBC Banque and KBC Autolease together. These KBC entities are then able to share your data with one another. Such exchanges are also possible if you're not, or you are no longer, a customer of any of the KBC companies. This enables KBC companies to look into your situation and proactively suggest alternatives aimed at your specific situation.

Your consent to personalised information also applies to offers from carefully selected partners of KBC that supply products and services in the general field of bank-insurance. Those partners must at all times meet the following criteria:

- They must be a provider of financial services or an insurance company. Financial service providers include banks, credit institutions, wealth managers, funds, stockbrokers and lease companies in as far as their offering to private individuals is concerned.
- The partner has to be properly licensed for the financial service or insurance that KBC is offering to you.

The information is provided to you by KBC and not the partner. That way, data processing by the partner is limited and they only receive data about you if you yourself show an interest in the information. The information concerns products and services from the general fields of banking and insurance such as savings products, investment funds, lending and insurance (both property cover and life insurance). KBC has contractual arrangements with partners, in which they confirm that they will adhere to the data protection laws. In addition, KBC imposes some restrictions on itself: KBC declines to form partnerships with undertakings that have recently been found guilty of serious breaches of the data protection legislation. A list of our current partners can be found at www.kbc.be/partners.

If you do not want to receive a highly personalised offer, simply do not consent to receiving personalised information. However, even if you do not give your consent, you might still receive offers from KBC Securities. For those basic forms of offering, KBC Securities uses only a limited number of details (such as who you are and where you live, your date of birth, your marital status, your contact details, family relationships, the applications and products you have, or any lack of interest on your part in certain products). In these cases, KBC Securities can only propose KBC Bank's or KBC Insurance's own products and services or those of KBC Asset Management & Markets but not those of other KBC entities or partners. In this regard, KBC acts in accordance with its legitimate interest. KBC completes the limited data set with your usage patterns on its websites and applications, albeit only if you agree to the use of cookies. The KBC offering does not entail any obligation to buy.

If you do not want any publicity at all, you should exercise your right to object to direct marketing.

KBC does not use spyware.

The KBC Securities product and service offering does not entail any obligation to buy.

3.6 What if you don't want to receive any direct marketing at all from KBC (Securities)?

Perhaps you've no desire at all to receive direct marketing from KBC Securities. KBC Securities respects that. An ordinary request is enough to exercise your right to object to direct marketing. Simply send an e-mail to groupcompliance@kbcsecurities.be.

3.7 KBC Securities does not sell your personal data.

KBC Securities does not sell or hire your personal data to third parties for their own use, unless you opt for this yourself and give your consent.

KBC Securities can nevertheless offer anonymised insights into the market that are derived from your personal data so long as those receiving the insights are unable to identify the person whose data was processed. You can also object to your personal data being used to generate insights of this kind.

Part 4: KBC Securities uses different types of data depending on the intended purpose.

KBC Securities processes your personal data for a variety of purposes. The different types of data are described below.

4.1 It concerns details to identify you, contact you and keep you properly informed.

What data KBC Securities uses for what purpose is set out below:

DETAILS OF IDENTITY	
Name, sex, date of birth, nationality, identity card number, customer number, national registration number, but also technical details such as identifiers for the devices you use (e.g., Mac address, IP addresses or unique identifiers for your devices, log in on online portals) and the way you use your device.	
CONTACT DETAILS	
Telephone number, e-mail address, language, postal address, user names in social media, etc.	
SERVICE-RELATED DETAILS	
Your product holdings	Account numbers, your financial and non-financial products
Your product usage	Your transactions, investments, account movements and balance, use of KBC Securities applications and platforms, etc.
Your professional details	Your profession, your position within the company, your company's representational authority, etc.
Your preferences and interests	Your potential interest in KBC Securities' investment products and other products, including specific services and advice.
PERSONAL PARTICULARS	
Your customer profile	Communication preferences, analysis of your behaviour
Your household composition	Marital status, family situation, relationships
Your overall financial situation	KBC Securities can give you sounder advice if it is apprised of your overall financial situation
Your lifestyle	Things like leisure activities and interests, club memberships, your home environment and property owned by you
Your occupation	Your education, profession, work experience, position within your company, your company's representational authority
Your feedback	Comments and suggestions, past complaints. These can definitely help KBC Securities to provide you with a better service in the future
Your investor profile	KBC Securities processes your investor profile in order to assess whether a given investment is appropriate for you. When other information is added such as age and investment horizon, KBC Securities can also process your risk profile and determine how you cope with investment losses, so that it can provide even more targeted investment advice

4.2 Information in the public domain and information obtained through third parties

KBC Securities sometimes also processes data in the public domain.

- It could be information that's subject to a reporting duty (like public notice of your appointment as a company director).

- Or data that you have placed in the public domain yourself, such as information on your website, your blog or via your publicly accessible social media profile, or information about you that KBC Securities has obtained from third parties.
- Or data that is in the public domain, say, because it is common knowledge in your area or because it has appeared in the press. Information from sources such as the companies register and Graydon also fall into this category.

KBC Securities can likewise receive personal data via third parties, for instance by purchasing it from companies like Bisnode or GIM. It is the responsibility of those companies to ensure that the relevant information is gathered lawfully.

In addition, KBC Securities receives personal data from third parties on the instructions of its customers (e.g., account information from an account held at another bank in connection with the provision of account information services).

This public information and data obtained via third parties may be relevant and can be used for the purposes that KBC Securities states in this Data Protection Statement and also to verify the accuracy of information we have on file and to support direct and indirect marketing campaigns.

4.3 KBC Securities remembers data from simulations, competition entries, etc.

When you fill in a form from KBC Securities, it naturally processes the data for the administrative management of the process for which you completed the form. That means the information you enter to do a simulation may be stored in the meantime, which saves you having to enter it again if you interrupt the process or want to start from scratch later.

So that it can evaluate the process, KBC Securities may ask you why you interrupted it, especially if, when you did, it was at a time when you'd been identified to the bank's satisfaction. Your data will be retained for a maximum of one year.

However, if you explicitly consented to the use of your personal data for direct marketing and/or personalised offers, this information may also be used to those ends. In that case, your data will be retained for a maximum of three years.

Form filling can be time-consuming (especially for complex simulations). Always provide us with the details we need to fully identify you as customer.

- A number of details will not then be requested from you but the form will be pre-populated with information held by KBC Securities in its files. You'll still sometimes be asked to check that the information is complete and up to date.
- Some details will be pre-populated on the form if they are available. You will still be able to make changes.

4.4 Information you give to KBC Securities staff may be processed

If you contact a member of staff at KBC Securities via phone, chat, orally during a meeting, etc., the content of that exchange will generally be recorded:

- to constitute a record of contacts between bank and customer;
- so that there is a (short) record of the contact;
- as a reminder for things that still need doing.

Even if you are not yet a customer, KBC Securities will store the information you provide. That information can be used if you subsequently become a customer.

By adopting this approach, KBC Securities seeks to avoid your having to constantly provide information or answer questions a second time. It also enables us to improve the continuity of our service to you.

4.5 Written correspondence with KBC Securities is carefully stored.

If you contact KBC Securities by e-mail or have digital communication channels that KBC Securities, then KBC Securities can send you statutory and official notifications via that channel.

Correspondence with staff members in their capacity as KBC Securities employees (sent to a job-linked or personal KBC Securities e-mail address, etc.) is deemed to be business-related and may therefore be examined in the context of:

- their duties;
- the production of evidence;
- workplace checks;
- security;
- fraud prevention;
- service optimisation and/or continuity, including the use of automated text analysis and editing to help KBC Securities staff correspond with you quickly and efficiently.

4.6 Recording telephone, video and chat conversations.

KBC Securities may listen in to or record conversations with you. These include phone conversations with commercial staff, a contact centre, a help desk, one of our support services or a broker in the dealing room.

KBC Securities does so for purposes related to training and coaching its staff and improving the quality, security and oversight of processes, for brief periods of three months.

However, KBC Securities may also do so as evidence of orders that are given to it. Like in the context of legal duties intended for the protection of investors (MiFID II), KBC Securities is required to record and retain telephone conversations and electronic communications that could result in transactions in investment products. KBC Securities therefore records the conversations and electronic communications of staff whose work duties relate to this. If you phone a staff member or communicate with them electronically, we record it. For evidential purposes and in order to comply with the legal obligations imposed further to MiFID II, KBC Securities keeps recordings for ten years. If a dispute arises, KBC Securities will keep them for as long as it needs to defend its position.

As part of its online service provision, KBC Securities can also conduct automated analyses of conversations in order to speed up and improve how it provides its services. Telephone, video and chat conversations, together with other communications and the emotions expressed in them, can therefore be used in the development and training of artificial intelligence. Artificial intelligence could ultimately allow written or spoken customer communication to be fully automated. Artificial intelligence can support KBC Securities staff and increase KBC Securities' ease of access. The link to personal data is severed as quickly as possible when developing and training artificial intelligence.

4.7 Temporary storage of security camera images.

KBC Securities NV has its registered office in a building owned and secured by KBC Bank. KBC Bank may use CCTV in and around the premises where it operates. In the case of security cameras, KBC Bank observes the special rules that apply. If a security camera is present, KBC informs you by means of a clearly visible sticker, for instance. In addition, KBC Bank in all events adheres to the 'besafe' guidelines issued by the Security & Prevention General Directorate of the Federal Public Service for the Interior (www.besafe.be).

KBC generally keeps images recorded by security cameras in and around KBC Bank premises (identified with a sticker) for no more than one month. They can be kept for longer:

- if the recorded images serve as evidence of certain dealings or may depict a criminal offence or unruly behaviour.
- as evidence of damage or loss, or in order to identify a criminal or miscreant, witness or victim.
- where a right of access is exercised, for as long as necessary to respond to the request.
- at locations that present a heightened security risk. Here the period is three months.

If you have questions about CCTV images, you can contact the CCTV Contact Centre at Egide Walschaertsstraat 3, 2800 Mechelen, or at CCTV@kbc.be.

4.8 Transaction details are stored and monitored.

KBC Securities obviously uses transaction details to perform and monitor transactions, and to pass them to other financial institutions that execute payment or settlement instructions.

KBC Securities may also use the transaction details to develop global models and perform analyses. It also uses them to gain a clearer picture of a customer, in order to, say, prevent or detect money-laundering.

4.9 It can go beyond your own personal data

If you have a company, KBC Securities also keeps a record of those relationships and also processes the details of any associated persons.

For legal persons, this implies that:

- KBC Securities processes data relevant to the relationship with associated natural or legal persons as well as the details of those persons (e.g., parent companies, subsidiaries, representatives, beneficial owners).
- In addition to the personal data of contact people, KBC Securities also keeps details of your business.
- The data on legal persons that are customers of KBC entities may be used and consulted by all KBC entities, in Belgium and abroad. This can be done on the grounds set out in part 3.
- Those data on legal persons can be shared, and may cover all aspects of the customer relationship: products held, a (historical) summary of transactions and contacts, (where applicable) the corporate group the customer belongs to and details of designated contacts.
- Please note that legal persons may only provide us with personal data of natural persons associated with them if those persons are sufficiently informed of this and, where necessary, have given their consent. Legal persons will be liable to indemnify KBC Securities in respect of any claims against it in this regard (*vis-à-vis* those concerned). For example, the company is responsible for complying with the data protection legislation when it submits a list of authorised persons or a list of users for online applications or of beneficiaries of employee profit-sharing bonus programmes.
- KBC Securities processes the contact details of representatives of legal persons to make appointments via the representative with the legal person, issue it with a commercial proposition and for relationship management purposes.

Part 5: On cooperation, security and confidentiality

5.1 Not everyone gets to see your data at KBC Securities.

Only those with appropriate authorisation can access personal data, and then only if it is relevant to the task they do.

In principle, within KBC Securities and KBC, your personal data will only be processed and consulted by certain departments that:

- you have, had or want contacts or contracts with;

- need to be involved in the provision or aftercare of services;
- fulfil legal requirements (at group level) or requirements imposed by regulators or stemming from corporate governance principles;
- are tasked with preventing fraud, including money laundering, by employees and customers.

Persons who are authorised to consult your data are moreover bound by a strict professional duty of confidentiality and must abide by all technical instructions to ensure the confidentiality of your personal data and the security of the systems in which the data is held.

5.2 Your data is processed at a limited number of locations.

KBC Securities uses the services of several processors to process personal data. These are companies that process data on the instructions of KBC Securities.

5.2.1 Processors within the KBC group

For the processing of personal data, KBC Securities makes use of processors within the KBC group based in the European Union, namely KBC Group NV and KBC Bank NV. This processing is carried out in Brno, for instance, by the Shared Services Centre, a branch of KBC Group NV in the Czech Republic.

Some of the data processing it does on the instructions of KBC Securities relates to oversight and support functions at group level, such as:

- the processing of corporate actions;
- financial reporting;
- the compliance function;
- the internal audit function;
- the inspection and risk function;
- support for invoicing and sanctions screening.

For ICT management, KBC Securities uses KBC Bank and KBC Group NV, who in turn also work in conjunction with other processors within and outside the KBC group. KBC Securities also uses the services of 24+ NV www.24plus.be:

- as a contact centre through which you can get in touch with us;
- for administrative processing on the instructions of KBC.

Examples include answering telephone enquiries, handling e-mails, and processing and executing online applications.

5.2.2 Processors characteristic of the financial sector

KBC Securities uses specialist third parties in Belgium and abroad to perform some processing operations. These include:

- SWIFT (www.swift.com) with establishments in Switzerland and the US, for global message exchange;
- custodians and subcustodians of financial instruments worldwide that are subject to local financial regulations;
- institutions for the settlement and clearing of payments and securities transactions, such as the CEC (www.nbb.be > payment systems) and Euroclear.

5.2.3 Other processors

KBC Securities may also directly or indirectly (e.g., through KBC Bank or group) make use of other processors, such as:

- lawyers and other consultants.
- third-party business introducers to fulfil its general duty of vigilance as laid down by law:
 - o The obligation to identify and verify identities;
 - o The obligation to identify the customer characteristics and the purpose and nature of the business relationship;
 - o The obligation to update information.
- market research agencies for performing surveys.
- ICT and ICT-security service providers like Microsoft, Cognizant, IBM, Amazon and HP, and specialist fintech and artificial intelligence companies.
- marketing and communication agencies and similar companies, whereby KBC uses personal profile information on you that is held by them to be able to make targeted offers to you via their channels (e.g., Google, Facebook).
- printers for printing and addressing news magazines, cheques and transfer forms, among other items.
- freelance translators and translation agencies.
- companies that support KBC in identifying and analysing your user behaviour in our applications and on our websites.
- companies providing Platform as a Service (PaaS) and Software as a Service (SaaS) in the cloud, such as:
 - o the Microsoft Dynamics CRM app used by KBC Securities to maintain customer overviews;
 - o the storage services of Microsoft Azure or Amazon;

- security services that screen Internet or e-mail traffic with KBC Securities for cyberattacks or phishing scams.

5.2.4 Processors outside the EU

When KBC Securities uses the services of processors, data may end up in countries where those processors' data centres are located. In the case of KBC Securities, this may for example mean that some of your data is processed in countries outside the European Union, such as India, Israel or the United States of America. It also means that, because of the commitment to manage incidents around the clock, processors with a data centre located in the EEA use the standard 'follow-the-sun' principle to switch their incident team at night to the US and then Asia.

The law in countries outside the EEA (like Israel, the United States of America and India) doesn't always afford the same level of data protection as in EEA member states. Where a non-EEA country is viewed by the European Commission as not offering an adequate level of protection, KBC Securities can cover the deficiency by, say, contracting with those processors according to a model approved by the European Commission.

5.3 Processing by other data controllers.

As data controller, KBC Securities may, in addition to using other processors, use other service providers or third parties, parties who themselves are data controllers, such as lawyers, experts in certain matters, consultants and/or specialists.

This is also the case, for example, when KBC Securities passes on contact details of customers to third parties based on a contractual relationship between KBC Securities and this third party, in order to supply other interested parties in the context of certain transactions.

5.4 KBC Securities takes specific measures to protect your data.

KBC Securities ensures that strict rules are followed and that the processors concerned:

- only have the data they need in order to perform their tasks;
- have an agreement with KBC Securities to process the data securely and confidentially, and only use it for carrying out the instructions issued to them.

KBC Securities will not be liable if these processors (according to law) disclose customers' personal data to local authorities or if incidents occur at those processors despite the measures they have taken.

KBC also ensures that the European data protection standards for personal data are applied worldwide within companies belonging to the KBC group and their branches. KBC ensures that companies and corporate branches of KBC take appropriate measures to protect the data of legal persons.

KBC Securities takes internal technical and organisational measures to prevent personal data finding its way into the hands of, or being processed by, unauthorised parties or being accidentally altered or deleted.

Strict security measures are in place to protect premises, servers, the network, data transfers and the data itself, and extra checks are also carried out by a specialist department in this regard.

To make particular online services as secure as possible, KBC Securities closely tracks new techniques and trends in cybercrime so that it can hone the relevant security measures accordingly. More information can be found at www.kbc.be/secure4u.

You should therefore be prudent when using means of communication that are vulnerable to abuse.

The websites, portals and applications of KBC Securities may contain links to websites or information of third parties. KBC Securities does not check such websites or information. Parties offering these websites or this information may have their own privacy policies in place, which we therefore advise you to read. KBC Securities is not responsible for the content of those websites, their use or their privacy policy.

KBC Bank sometimes facilitates the publication of information (including personal data) via social media such as Twitter and Facebook. Bear in mind that these channels have their own terms of use, with which you must comply. Publishing information on social media may have consequences (some of which may be undesirable), including for your privacy or that of persons about whom you share information. You may not be able to delete such published information quickly. You should therefore assess the consequences yourself as the decision to disclose information on such media ultimately lies with you. KBC does not accept any responsibility in that regard. KBC Securities does not keep your data forever.

5.5 KBC Securities does not keep your data forever.

KBC Securities uses your personal data for clearly defined purposes. Once that aim no longer exists, KBC Securities deletes the data.

The period for which your personal data are retained is the longest one defined by law (usually till ten years after the end of a contract or execution of a transaction. For commercial claims it is 30 years after the end of a contract or execution of a transaction). The period can be longer where needed for the exercise of our rights.

For some applications, a more extended time horizon may be necessary, such as for carrying out surveys, and risk and marketing models. Some insights only get clearer once they are viewed over a longer time span. This can result in the retention period being extended by ten years on top of the standard periods. As has been stated, KBC Securities will in all cases sever connections to individuals as quickly as possible and work only with aggregated or anonymised data.

5.6 KBC Securities thinks before it answers queries from outside parties.

5.6.1 It adheres to its confidentiality obligation.

As KBC Securities has to comply with its confidentiality obligations and with the data protection legislation, it may only answer queries from third parties if they arise pursuant to (i) a legal requirement or a legitimate interest, (ii) doing so is a prerequisite for performing the contract or (iii) the data subject has given their permission.

In the last case, KBC actually advises requesting the information directly from the data subject.

KBC Securities declines liability if, under applicable (foreign) legal obligations, the lawful recipients of personal data require to pass personal data about customers on to the local authorities or process it without an adequate level of security.

5.6.2 Such parties have to approach the Compliance department.

If you as third party have queries about customers, for example because you work for the police or are a notary public or lawyer, you can contact compliancegroup@kbcsecurities.be. This specialist department will answer your query subject to bank secrecy obligations and the data protection legislation.

5.7 You can also help protect your data.

There are certain aspects of technical data processing over which KBC Securities has no, or at best insufficient, influence and for which it cannot guarantee total security. Examples include the Internet or mobile communications (e.g., smartphones).

If hackers are active, KBC Securities does not always succeed in defeating their cyberattacks in time. It sometimes does not even know that it is happening, for example if a hacker manages to obtain your identification details by installing illegal software on your computer (spyware) or by creating a fake website (phishing). You will find more information on secure online banking at www.febelfin.be (safe online banking).

KBC Securities therefore suggests that you regularly take a look at the KBC website for information on safe Internet banking: www.kbc.be/secure4u. This site always contains the most up-to-date tips and recommendations to keep you secure online.



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