

## Privacy Notice Concerning Personal Data Processing by ING Bank Śląski S.A.

ING Bank Śląski S.A. presents the following information required by the Regulation of the European Parliament and of the Council regarding protection of personal data:

### Legal basis

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 Official Journal of the European Union L.2016.119.1 of 4 May 2016 effective as of 25 May 2018 (hereinafter referred to as the Regulation).

We make the following references herein:

**We, or the Bank** – ING Bank Śląski Spółka Akcyjna with its registered office in Katowice. Bank particulars, inclusive of information about entering the Bank to the court register, Tax Identification Number [NIP] and address of the Polish Financial Supervision Authority that is the Bank's regulator, may be found in the footer of each page hereof.

**You, or Competition Participant** – a natural person whose personal data are processed by the Bank at least for one of the purposes specified herein. We took the liberty to refer to you directly for better clarity of the text.

### 1. Bank - the controller of your personal data, contact details of the Bank and our Data Protection Officer.

The Controller of your personal data is ING Bank Śląski S.A. that carries out its business in accordance with its charter, inclusive of its brokerage business that is carried out in the Brokerage House of ING Bank Śląski S.A. being a separate entity within the organisational structure of the Bank. The registered office of the Bank is in Katowice at the following address: 40-086 Katowice, ul. Sokolska 34, website: [www.ingbank.pl](http://www.ingbank.pl). You may get in touch with the Data Protection Officer of the Bank by sending a letter to the Bank's address, preferably with a postscript "Data Protection Officer", or by sending an e-mail on: [abi@ingbank.pl](mailto:abi@ingbank.pl). You may also use an e-mail address of the Bank: [info@ingbank.pl](mailto:info@ingbank.pl) or you may call: 801 222 222.

### 2. Which institution is a regulator as regards personal data?

A regulator for personal data in Poland is now the President of the Office of Personal Data Protection. You may complain to the regulator.

### 3. Can you file objection or withdraw your consent or authorisation?

You may object to certain type of processing of your personal data – most notably for marketing purposes. The Bank will consider legitimacy of your objection. If your objection refers to processing of your personal data for marketing purposes, the Bank will act on it, unless at the same time you uphold your consent to processing of your personal data for marketing purposes, or you give such consents during the period for complaint processing or any time thereafter. All your consents are voluntary. You may withdraw all consents to processing of your personal data, or some of them. Withdrawal of a given consent does not affect the right of the Bank to process your data for the purposes described therein prior to its withdrawal. It is also possible that the Bank will be legally authorised to process the data under a different legal basis or for a different purpose.

Each process provides information on how to withdraw your consent. Sometimes, consent to data processing is indispensable in order to perform certain activity. For instance, after expiration of an agreement, the Bank will continue to be able to assess your creditworthiness, unless this activity may be performed by the Bank under the law.

If you authorise us to convey bank secret information, you may withdraw such an authorisation and we will no longer convey any data or information referred to therein.

If, as a result of the authorisation, you conclude an agreement with another entity that receives such data, please draw attention whether such a withdrawal will or will not lead to other legal consequences under your agreement or under the law. Withdrawal of your authorisation may make it impossible to perform your agreement in whole or in part.

#### 4. Why do we process your personal data?

The Bank processes your data to:

- a. process your application and your participation in the Event called “Lion’s Den - ING Modelling Challenge” and to provide you with updated information thereabout, inclusive of announcement of the Competition results, issue of Awards and processing of complaints, if any, related to organisation and course of the Event; the legal basis for data processing is your consent and legitimate interest, namely running the Event and Competition wherein the Participant decided to participate;
- b. fulfill legal duties of the Controller related to running the Event, inclusive of the ones provided for by tax acts, accounting regulations, as well as for commercial and marketing purposes – the legal basis for data processing is your consent; Commercial information includes advertisement of any kind, promotions, competitions and games of chance, as well as commercial offers or offers to buy. It may refer to: promotion of the image, services or products of the Bank or any other entities whose services or products are offered by the Bank, or are connected with the activity of the Bank. Commercial information may be profiled or not. You may resign from profiled marketing any time you wish.
- c. promote the Event and to build a positive image of the Organiser in public space and in mass media, including publications on the website [www.ing.pl](http://www.ing.pl). The legal basis for your image data processing is your consent;
- d. execute any other legitimate interests of the Controller, inclusive of the right to sue or defend any claims, archiving purposes (evidence purposes) to safeguard information should it be needed to prove the facts.

#### 5. What are the categories of the Data Recipients?

Personal Data may be also disclosed to:

- a. tax authorities, Members of the Commission within the scope indispensable for running the Events, granting an Award and an Additional Award,
- b. ING Business Shared Services B.V., with its registered office in Amsterdam, the Netherlands, operating in Poland as a Branch under the business name ING Business Shared Services B.V. limited-liability company Branch in Poland with its registered office in Katowice, ul. Konduktorska 35, 40-155 Katowice in connection with organisation of a given event.

## 6. How long will the data be processed by the Bank?

Your Personal Data:

- a. that are processed based on your consent – will be stored until you withdraw your consent,
- b. that are processed in order to fulfil legal obligations of the Controller – will be processed until such obligations are fulfilled,
- c. that are processed based on the legitimate interest of the Bank – will be stored until the legitimate interests of the Controller that give the legal basis for processing thereof are fulfilled, or until objection is raised against such processing.

## 7. Know the rights you have concerning the Bank

- a. You may request the Bank to give you access to your personal data and to correct them whenever they are not true, and also to remove them or to restrict processing them in cases provided for by the law.
- b. You may lodge an objection to data processing. Your objection will be processed by the Bank.
- c. As of 25 May 2018 you will have the right to transfer the data or to get a copy thereof; however the right cannot have an adverse effect on the rights and freedoms of other persons, inclusive of commercial secret information or intellectual property, and it will be realised within the technically possible scope. The first copy is free of charge. Due to other regulations, for instance banking law, consent of the Competition Participant or consent of another person, or fulfilment of some other conditions required by law, may be required to transfer the data. Any requests concerning execution of the Competition Participant's rights may be submitted by electronic means in a way described in internet banking system or may be submitted in writing. Submission of such requests by phone may be allowed if the Bank makes such a process available for execution of a given right, keeping in mind the required verification of the Competition Participant's identity. The Bank may demand that the information or activities that the request refers to shall be more precise. Complying with the request to transfer the data or to get a copy thereof, the Bank hands them over advising about the used electronic format or carrier.
- d. Consent of any type to data processing for marketing purposes is voluntary. In some cases, it is necessary to transfer the data to a third party, or to receive data from such an entity, to perform the agreement. Then, consent or authorisation to such a transfer will be necessary unless a separate legal basis for transfer exists. If you refuse to give such a consent or authorisation, or if you withdraw it, it may affect conclusion or performance of the agreement with a third party, or it may affect certain activity if transfer of the data is necessary to conclude or to perform a given agreement or certain activity.

## 8. Final stipulations

You may withdraw any earlier consents or authorisations to processing of personal data. This right refers also to consents to data processing by the Bank for marketing purposes, or authorisations to transfer the data to another entity, which you gave the Bank in the past. Withdrawal of a given consent does not affect the right of the Bank to process your data for the purposes described therein prior to its withdrawal.

The rights provided for in the Regulation, most notably the right to get a copy of the data, the right to move the data, the right to erasure, the right to restrict the data, may be realised by you starting from 25 May 2018, that is starting from the date on which the Regulation started to be applied on the terms and conditions set out therein, and compliant with other legal regulations.

This information fulfils the legal obligation. You are not required to take any actions.