



## KBL WEBSITE DATA PROTECTION POLICY

At KBL, we care about the privacy and personal data of our clients and visitors of our website.

KBL European Private Bankers S.A. (KBL) and/or the KBL group entity in relation to which you use the website is/are the data controller(s) of this personal data (the organisation(s) which alone or together determine(s) why and how personal data is used). The terms "KBL" or "we" or "our" or "us" used in this Website Data Protection Policy (the "Policy") refer to such data controller(s).

This Policy describes how and why we will process any personal data collected from you or that you provide to us when visiting our website.

### Purposes for collecting and using personal data

When you visit our website, we may collect personal data from you to allow us to provide certain services to you such as answering your questions or providing you with marketing information. You may also provide us with your personal data when you communicate with us through the contact forms on our website, register to download material, apply for a job or internship, sign up for newsletters, apply to attend an event proposed by KBL or use the search section of the website.

We will process your personal data for the purposes listed above on the basis of one or more of the following:

- the processing is necessary for the performance of a contract or for entering into a contract with you;
- the processing is necessary for us to comply with a legal obligation;
- the processing is necessary for our or a third party's legitimate interests, for example when answering any queries from you, providing newsletter services and other email marketing regarding services you receive from KBL, managing requests (e.g. to attend an event), compiling statistics, improving our website or its user experience as well as any services we provide to you; or
- you have given your prior consent, for example, to receive commercial communications from us or third parties or for us to use cookies (please see section "Cookies" below in this respect).

The personal data that we collect from you may, depending on your use of our website, include your name, your surname, email address, the company for which you work, company address, telephone number, the country or city where you live.

### Collection of personal data by automated means

#### Cookies

Like most websites, KBL uses cookies. Cookies are text files containing small amounts of information and which your computer or mobile device downloads when you visit a website. When you return to websites - or visit other websites that use the same cookies - they recognise these cookies and therefore your browsing device.

Our use of cookies lets your browser navigate through our website efficiently and helps us understand how our website is being used and assists us in ensuring that we are providing an optimum service to you by allowing us to:

- provide the requested services and ensure the security of the website and user;
- recognise your device so you do not have to give the same information several times during one visit;
- measure how many people are using our website and how they are using it, so that we can make our website faster, easier and more relevant to use. To do this, we use Google Analytics subject to the visitor's prior consent;

We use Google Analytics, a web analytics service provided by Google Inc. In this regard, our website will be analysed in order to, for example, count the number of visitors to the site and see which pages are visited the most. This will enable us to improve our website and our services. Google Analytics notably uses cookies to carry out its analysis, provide its services and for technical support. Data which are recorded include your IP address, the number of pages visited, the time and duration of the visit, your location, the origin of the visit, the type of hardware and software used, interaction visitor and your search history. The data obtained will be transferred to Google and saved by Google on servers in the United States; a country which does not provide for a similar level of data protection as the European Union. [Click here to learn more about Google Analytics.](#) Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. We do not use other Google services in combination with Google Analytics cookies.

#### Data disclosure

To meet the purposes for which we collect and use your personal data, we may share your personal data with other entities within the KBL Group, with our service providers which support us technically in the provision of our website and services, with public administrations and related bodies to the extent necessary for us to comply with any applicable laws and regulations as well as with potential purchasers of, or investors in, some or all of our business, and with their advisors and financiers where we have a legitimate interest to do so.

#### How we protect your personal data

We have implemented administrative, technical and physical safeguards for our websites to protect your personal data from loss, misuse, unauthorised access, disclosure, unauthorised alteration or unlawful destruction. In addition, we require such service providers to put in place appropriate technical and organisational security measures in respect of any of this personal data.

#### Your rights

You have the following rights regarding the use of your personal data by us (subject to applicable exemptions):

- right to access the personal data held about you and receive additional information about how it is processed;
- right to correct any inaccurate and complete any incomplete personal data;
- right to delete your personal data from our systems, e.g. where the personal data is no longer necessary in relation to the specified purposes;
- right to restrict the processing of your personal data in certain circumstances, e.g. where you contest its accuracy or object to processing;
- right to receive your personal data in an interoperable format, or have it directly transmitted to another organisation;



- right to withdraw your consent at any time where you have provided us with your consent to the processing of personal data (in particular regarding the receipt of commercial communications and cookies tracking website use, creating personalised content and processing analytics);
- right to object the processing of your personal data, in certain circumstances and considering other regulatory requirements, in particular where we rely on legitimate interests, including for profiling; and
- right to lodge a complaint with the Luxembourg Data Protection Authority (the Commission nationale pour la protection des données) or any other competent Data Protection Authority.

If you wish to make a request in relation to any of the rights listed above or if you would like to raise any other questions relating to data protection, you may contact KBL's group data protection officer using the following email address: [DATAPROTECTIONOFFICERKBL@kbl-bank.com](mailto:DATAPROTECTIONOFFICERKBL@kbl-bank.com)

#### Data Retention

We will retain your personal data only for as long as necessary for the relevant processing activity and/or for as long as is necessary to comply with all relevant statutory and regulatory requirements.

#### Changes to our Website Data Protection Policy

From time to time, we may change this Website Data Protection Policy. Any changes that we may make to our Policy will be posted on this page. The revised Policy will be effective immediately upon posting to our website for first time visitors and one month after posting for repeat visitors.