

Privacy Statement

Content

- Introduction 2
- What does processing personal data mean? 2
- 1. Whose personal data does Rabobank process? 2
- 2. What does Rabobank expect from businesses and organizations? 2
- 3. Who is responsible for the processing of your personal data? 2
- 4. Which personal data do we process? 3
- 5. How does Rabobank come by your personal data? 5
- 6. For which purposes, and on what basis, does Rabobank process personal data? 5
- 7. How long does Rabobank keep your personal data? 12
- 8. Does Rabobank also process special categories of personal data, information about criminal convictions and citizen service numbers (BSNs)? 12
- 9. Does Rabobank use automated individual decision-making including profiling? 13
- 10. Which people have access to your data? 13
- 11. Do we use personal data for any other purposes? 13
- 12. Does Rabobank transfer your personal data to other parties and to other countries outside the EU? 13
- 13. What rights do you concerning your personal data held by us? 15
- 14. How can you use your data subject rights? 15
- 15. Where can you go to in case of a question or complaint? 16
- 16. What can you approach our Functionaris Gegevensbescherming (FG) for? 16
- 17. Can we change this Privacy Statement? 16

Introduction

You share all kinds of personal data with Rabobank without noticing it. By using your debit card, your contact with a relationship manager or product specialist, our customer service or if you bank online. We naturally handle this data carefully. This Statement provides information on how Rabobank Wholesale Banking in the Netherlands approaches processing your personal data. This is clarified through examples that make it easier to understand.

What does processing personal data mean?

· *Personal data*

- Information that says something directly or indirectly about you as an individual is referred to as personal data. Examples include your name and address, and also information such as your income or personal wealth.
- Information relating to a sole trader, commercial partnership or professional partnership is also considered personal data.
- Information relating to a legal entity is not personal data, but information relating to a legal entity's contact person or representative does count as personal data.

· *Processing*

Processing means anything that can be done with personal data. This includes the collection, storage, use, transfer and removal of data.

1. Whose personal data does Rabobank process?

We process personal data if we have, want to have, or have had a business relationship with your company or other legal entity, you and/or your companies representatives. The people whose personal data we process includes:

- People who show an interest in Rabobank or our products and services.
- People who are connected in another way with a business or organization with which we have, want to have, or have had a business relationship (e.g. employees, executive directors, authorized representative or (ultimate) beneficial owners).
- Security providers and guarantors.

2. What does Rabobank expect from businesses and organizations?

If your business or organization transfers any personal data concerning employees, executive directors or ultimate beneficial owners (UBO's) to us, we expect your business or organization to inform them about this. We also collect personal data of employees or executive directors not being provided by your company or organization. For example by retrieving these data from the Chamber of Commerce or other publicly available sources. We process this data as well. You can give this Privacy Statement to them so that they can learn how we deal with their personal data.

3. Who is responsible for the processing of your personal data?

This Privacy Statement describes how we deal with personal data processing by Rabobank Wholesale Banking in the Netherlands. Personal data may be shared within Rabobank Group to the extent that this is permitted by law. These Group divisions also contain other divisions like for example [DLL](#). An overview of the Group divisions can be found [here](#). When sharing data within the Rabobank Group, we comply with the rules that we have agreed within the Rabobank Group, the Rabobank Privacy Codes. These rules describe how the divisions of Rabobank Group deal with personal data.

4. Which personal data do we process?

<i>Types of data</i>	<i>What kinds of data might be involved?</i>	<i>Examples of how Rabobank uses this data</i>
Information that allows an individual to be identified directly or indirectly	Name, address, telephone number, e-mail address, information provided in your identity document.	For identification purposes, to draw up an agreement or to contact you.
Information relating to or used for agreements or financial statements	Information about the financial situation, the products you have your investment profile (if you invest) and information used for obtaining finance. Or other products and services that are offered.	To assess credit worthiness, or to assess whether a product / service is suitable.
Location information	Information that shows where you are.	To find out where and when you used your debit card. We do this to combat fraud. For example the data provided by the ATM using your debit card.
Payment and transaction data	When a payment is made, information about the person you paid or who paid you, when the payment took place and what the balance in your account is.	<ul style="list-style-type: none"> • To ensure correct / timely processing of funds is performed. • To be able to check whether the number that was entered matches the name you specified in a payment instruction. • open sources e.g. media searches. • To pass your data on to the other bank (if you make use of the switching service). • If you make a payment in the Netherlands and in another country at the same time, we may be able to take measures. • to identify possible payments arrears running up in an early stage. • For anti-money laundering / counter terrorism financing and sanctions monitoring. • For your security and ours.
Special categories of personal data/ criminal data	Information concerning your health, biometric data, data related to criminal convictions and offences, data which reveal your racial or ethnic origin or political opinions and your citizen service number (BSN) or equivalent.	<ul style="list-style-type: none"> • In the context of tax obligations and combating terrorism we are required to record information about your country of birth. • In addition, we may record special categories of personal data in the context of Anti-Money Laundering and Facilitation of Tax Evasion and Regulatory reporting from open sources e.g. media searches. • In addition, we record special categories of personal data in the context of payments, for example if you make a payment at a pharmacist's or transfer money to a political party. We may use biometric data to identify you. • We may use biometric data to identify you.

<p>Recorded calls, conversations with Rabobank employees, recordings of video calls, online chat sessions, video surveillance, recorded e-mails and social media</p>	<ul style="list-style-type: none"> • Conversations we have with you, and you have with us, by telephone or in online chat and video. • Conversations we have with you in person that we register. • E-mails you send to us and which we receive from you. • Camera images that we take in banking premises or at ATMs. • Comments, video, photographs, likes, public posts that you post on our social media pages. 	<ul style="list-style-type: none"> • We may use the recorded (video)calls, e-mails and online chat conversations to combat fraud, to fulfil legal obligations, to monitor quality, to provide proof, to improve our services and to train, coach and assess our employees. • Camera surveillance is used to combat and investigate fraud, to provide proof and monitor quality. • We use comments, video, photographs, likes, public posts that you post on our social media pages to answer questions and share information.
<p>Data that say something about the use of our website, e-mails and the app.</p>	<ul style="list-style-type: none"> • Cookies • Pixels • IP address • Data relating to the device on which you use our online services or our website. 	<ul style="list-style-type: none"> • To monitor your internet behavior in our app and on our website • To enable our online services to be used. • To improve our website. • For displaying targeted adverts or banners. • To improve our website and app, we use analytical cookies (like Google Analytics). We also use Google Analytics if you have installed an ad blocker. • To combat fraud.
<p>Data we receive from other parties</p>	<ul style="list-style-type: none"> • Data obtained from the Chamber of Commerce, Dun & Bradstreet Registry and Mapping Agency (Kadaster). • Businesses to which you have given consent to share your data (for example other banks and data brokers). 	<ul style="list-style-type: none"> • We use this information to check Directors and UBO's details, whether you can be granted credit, or to check the value of a residential property.
<p>Data we share with other parties</p>	<ul style="list-style-type: none"> • Financial information. • Data we provide to other parties that we engage to help us provide services. • Data you have asked us to share with another party. • Data we have to share with our regulators or the O register. 	<ul style="list-style-type: none"> • We are required to provide specific data to the Dutch Tax and Customs Administration and our regulators: the Netherlands Authority for the Financial Markets (AFM), the European Central Bank (ECB), the Dutch Central Bank (DNB), the Netherlands Authority for Consumers and Markets (ACM), and the Dutch Data Protection Authority (Dutch DPA). • Other parties (such as marketing agencies) that process data on our behalf because they are involved in the provision of our services. • You may also ask us to share specific data with a third party, for example by using IDIN. • Because of joint transaction monitoring, we might share data with other banks and TMNL in order to prevent money laundering and the financing of terrorism.

Data we require to combat fraud, to ensure your security and ours, and to prevent money laundering and the financing of terrorism	<ul style="list-style-type: none"> • The data we keep in our internal and external referral registers, sanction lists, location information, transaction data, identity information, camera images, cookies and IP address. • Data relating to the device on which you use online services. 	<ul style="list-style-type: none"> • In order to comply with legal obligations and prevent you, the financial sector, Rabobank or our employees from becoming the victims of fraud, we check whether you appear in our external or internal referral registers and we have to check whether your name appears in sanction lists. • We may use your location information and transaction data in order to monitor payments if they are in keeping with your usual pattern of spending. • We may use your IP address, device details and cookies to combat online fraud (DDoS attacks) and botnets.
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5. How does Rabobank come by your personal data?

We receive your personal data because your company and/or you provide it to us yourself. Examples include data you enter on our website yourself in order that we can contact you, and data arising from the services we provide in areas such as syndicated loans and payments. We may also receive your data from:

- a. Business units within Rabobank Group for example:
 - In the context of combating fraud, money laundering or terrorism
 - Internal administrative business processes
 - To create and execute risk models
 - To improve our services
 - In the context of our duty of care.
- b. Other financial institutions in the context of combatting fraud, money laundering or terrorism.
- c. Suppliers or other parties we work with. For example Dun & Bradstreet. We might also receive information from the Kadaster (Cadaster/Land register), the CBS, EDM, Orbis, Reuter, Bloomberg and the Kamer van Koophandel (Chamber of Commerce).
- d. Public sources like newspapers, public registers, websites and open sources of social media.
- e. Another party in case you have given your consent to share data with us.

6. For which purposes, and on what basis, does Rabobank process personal data?

We can only provide you our best service when we know you and your company well. For that we need your personal data and have to process it. We do this because we have to carry out an agreement with you but also because we are obliged by law to do so. We process your data for the in 6a-6i mentioned purposes and legal basis.

Consideration legitimate interest

We use the “legitimate interest” basis to process your personal data. Then we make a trade-off between the interests of Rabobank and the violation of your privacy. Our interests are, for example, the following:

- We protect our own financial position (for example to assess whether you can repay your loan or if we want to sell your loan or other obligations).
- We combat fraud to prevent us, but also the financial sector, to ensure your security and ours and to prevent damage.
- We need to improve our business processes, take measures in the context of company management and perform audits on our internal processes.
- We transfer loans, we merge or take over companies to remain a financially sound bank.
- We have an interest in the financial wellbeing of our clients. We take measures to help you. We try to identify in an early stage possible payment arrears from running up.
- We may have an interest in direct marketing and we will keep you informed of new or existing products that we believe fit you.

We weigh our interests or the interests of third parties against your interests and your right to privacy. For example, we look at whether we cannot achieve the same goal in another way. And whether we really need all data. Do we want to use sensitive data? Then your right to privacy will have been overridden earlier and it will be less likely for us to use your data based on a legitimate interest. Sometimes it is not clear from the law or regulation on what legal basis we might process your data. Or the obligation is not in a law or the law does not apply directly to us. Such as the obligation to make risk models. Because we have an interest in keeping the financial sector healthy, we then use this data based on the legitimate interest. Examples of this are:

- An IBAN name check to prevent you from becoming a victim of fraud.
- Making telephone and image recordings during an inbound or outbound call in order to combat fraud and to improve the quality of our service. This helps us to train, coach and assess employees properly. And also to provide any required evidence.

Others may also have a legitimate interest in processing your data. For example if someone has accidentally transferred money to you and you do not want to repay it. Then in some cases we can pass on your contact details to the person who has accidentally transferred money to you.

a. To enter into a business relationship and agreement with your company and/or you

We need to have your personal data if your company and/or you want to become a client, or if you want to use a new product or service or contact us.

- For example, we have to perform research to assess whether we can accept your company and/or you as a client. When your company and/or you become a client, we have to establish your identity for almost all our products and comply with our legal obligations. As part of this, we may make a photocopy of your proof of identity.
- If you so wish and to the extent technically available, we will also use biometric data, such as a face scan, to establish and verify your identity. We use the photocopy of your proof of identity solely for identification and verification purposes.
- If your company and/or you wish to become a client, or are already a client of ours, we will consult the incident registers and warning systems of Rabobank (the internal referral register) and the financial sector (the external referral register)
- We also check that your company and/or you are not on any national or international sanction lists.
- We assess whether the requested product or service is suitable for your company and/or you. For example, we assess whether we can provide your company and/or you with credit. When making this assessment, we may also use data that we obtain from other parties.
- We perform analyses to assess whether we can provide your company and/or you with credit or another product. In some cases, we have to do this, for example because we are required to do so under Dutch or European laws and regulations.
- If necessary, we will calculate a credit score from your company and/or you. In order to do so we will use Information your company and/or you provided us. We might also look at the use of your loan or other financial product and how much money your company and/or you withdraw. We are required to use these credit scores when deciding whether or not to grant you credit, and in case of financing, to calculate the price your company and/or you have to pay and to have an early warning system in place. This score is then used by authorized staff to determine whether or not your company and/or you might obtain credit.

The decision whether or not to grant your company and/or you credit and to calculate the price is not made fully automated. Also the signaling of possible defaults is not done fully automated.

- The bank may use a profile of your company and/or you to ensure that a product is and remains suitable for your company and/or you, for example if your company and/or you apply for a financial product. We have studied the characteristics of clients in arrears for which we obtained from other parties and we can therefore use this research to develop a model. We may use this model if your company and/or you apply for a financial product or during the term of your financial product. If this model reveals that your company and/or you are exposed to a high risk, we may decide not to provide your company and/or you with a financial product.

Legal basis

For the most part, we process your personal data because we are under a legal obligation to do so. If, however, this legal obligation does not apply directly to Rabobank, we have a legitimate interest in processing your personal data for the above mentioned purposes. We must then be able to demonstrate that our interest in using your personal data outweighs your right to privacy. We therefore weigh all interests. More information about this balancing of interests can be found [here](#). We may also process such data where this is necessary to conclude the agreement.

b. To perform agreements and carry out instructions

When your company and/or you are a client of ours, we want to be of service to you. We execute the instructions we receive from your company and/or you and perform the agreements we have concluded. This is what we have agreed with your company and/or you. We process personal data for this purpose.

- If your company and/or you make a payment through us, we transfer your data to another bank. The payee can also see and record your payment data. Both the person who issues the payment instruction and the beneficiary (payee) may enquire about specific data relating to the other party's account.
- When executing a payment instruction, we may use the IBAN-Name Check to ensure that the IBAN you entered in the online banking or mobile banking app corresponds with the name known to us. If it does not, we will bring this to your notice. Your company and/or you can then decide whether to continue with the payment instruction or adjust it.
- If your company and/or you make use of the switching service, we will pass the amounts credited to your account on to your new bank. You receive an account statement containing a list of all transfers made. We might use a third party to make sure the withdrawals and incoming payments are received on the proper account.
- We might make recordings of telephone conversations, e-mail messages, camera images, online chat sessions and video chat sessions, for example, and may document these recordings. The purposes for which this is done include proving that you issued a particular investment instruction. We may also do this if we are legally required to do so, or to provide proof and monitor quality, to investigate fraud and other matters, and for training, coaching and assessment purposes.
- For example if your company and/or you ask us for a loan or if you would like to invest, we could take information into account on other products you have with us. Also during the duration, we can take this into account.
- We also provide your company and/or you with information about the transactions in your bank account, or credit or financing, or, if your company and/or you are at risk of falling behind on your payments, we may contact you to look for a solution.
- Your company and/or you may also ask us to divulge your personal data to a third party, in which case we will transfer your personal data to that party. For example by using IDIN or if you share data with a payment service provider.
- In our role as an intermediary acting for other service providers such as Achmea, we transfer data to enable us to perform our work as an intermediary.

Legal basis

We process personal data because this is necessary in order to perform the agreement, and also because we are under a legal obligation to do so, for example in the context of payments. If your company and/or you do not provide certain information to us, we will not be able to perform the agreement. In a number of cases, we have a legitimate interest in processing your personal data, for example when making recordings of telephone calls (except for in the case of investments, in which case

telephone calls must be recorded by law). More information about this balancing of interests can be found [here](#).

c. To ensure your security and integrity as well as the security and integrity of the bank and the financial sector

We process your personal data to ensure your security and ours, and also security of the financial sector. We also do this for the purpose of preventing fraud, money laundering and the financing of terrorism.

Customer Due Diligence

Not only when we enter into a business relation with your company and/or you, but also during our business relation, we might check you, your representatives and UBO's or other controlling persons whether we can still accept you as our client. For example your financial position might be a reason for an additional check. Or the people your company and/or you do business with.

Incident registers and warning systems

If your company and/or you wish to become a client, or are already a client of ours, we will consult the incident registers and warning systems of Rabobank (the internal referral register) and the financial sector (the external referral register). Not all bank employees consult these registers themselves. When a bank employee performs a check in the internal referral register or external referral register, the employee only sees whether an entry has been made in the register. Every financial institution has its own security department. If there is an entry in the register, the security department assesses whether the client may have a particular product or may use a particular service based on the information contained in the department's own records or the incident register. We may share information that is included in the incident register with other financial institutions. We only do this in cases where this is permitted under the [Protocol in respect of the Incident Warning System for Financial Institutions \(PIFI\)](#). In addition, public authorities send us lists of individuals, which we have to enter in our warning registers. These are individuals with whom financial institutions must not do business, or to whom the financial sector must pay extra attention. We may consult the incident registers and warning systems, and we may also record your personal data in these registers. If we record information relating to you in these registers, we will notify you unless we are not allowed to do so, for example because the police ask us not to notify you in the interests of their investigation. If you do not agree to the recording of your personal data, you can object to this or ask that your data is corrected or erased. You can find more information [here](#).

Publicly accessible sources

We consult publicly accessible sources, such as public registers, newspapers and the internet and public profiles of your social media, in an effort to combat fraud and protect the bank.

Fraud and money laundering

We may perform analyses aimed at preventing fraud and money laundering and protecting you and the bank. For example, we may create a profile of your usual payment behavior in order to reduce fraud or the misuse of debit cards and credit cards. If the observed behavior differs from your usual payment behavior, this may form grounds for declining or postponing payments by fully automated means. If we have decided to do this, we will inform you as soon as possible. We may make use of information that your company and/or you did not supply to us in the context of combating fraud, such as information about the transactions in your account. We may also share your transaction information with other banks in order to prevent money laundering and the financing of terrorism. The regulator also requires that we do this. To prevent fraud, we may use the IBAN-Name Check to ensure that the number you entered in the online banking or mobile banking app corresponds with the name known to us. If it does not, we will bring this to your notice. You can then decide whether to continue with the payment instruction or adjust it. We may also use the IBAN-Name Check for other parties in connection with preventing, detecting and combating the misuse of the payment system. As part of efforts aimed at combating cybercrime and computer attacks such as botnets, we transfer information relating to you to parties that fight cybercrime. We will do this if we detect that your security or the security of the financial sector could be in danger. We will only do this if we have reached agreements with these parties concerning the careful use of your data. We make recordings of telephone conversations, e-mail messages, camera images and

online chat sessions, for example, and may document these recordings. We do this in the context of investigating fraud. For example, we take camera images to prevent debit card fraud. We may also do this if we are legally required to do so, or to provide proof and monitor quality, and for training, coaching and assessment purposes.

Legal basis

We process your data because this is necessary in order to comply with a legal obligation. If we are not under a direct legal obligation to process your data, we process the data on the basis of a legitimate interest of Rabobank, the financial sector or our clients and employees. More information about this balancing of interests can be found [here](#).

d. To help develop and improve products and services

In order that we can be of service to you and can innovate, we develop and improve products and services on an ongoing basis. We do this for ourselves, our corporate clients or other parties.

- We sometimes combine data sources, such as information on the products and services you receive from us and the balance in your account. We may conduct benchmarking for our corporate clients, which provides these clients with additional information on how they perform in comparison to other businesses. The results of this study relate to a group of clients, and never an individual client (this is known as aggregate data).
- We also process data when analyzing your visit to our website. We do this with the aim of improving our website. We use [cookies](#) for this.
- Analyzing personal data allows us to see how you use our products and services. We also use the results of analyses to categorize clients into group. With this we create customer and interest profiles.
- We sometimes use other parties to process your personal data for this purpose, for example in order to measure or ask you how we can improve our services. In that case, these other parties act on the instructions of Rabobank.

Legal basis

We process your data because we have a legitimate interest in this. We may also ask you for your consent to process your data for the purpose of developing and improving our products and services. If you do not give your consent for the purpose of developing and improving our products and services, this will not affect the services we provide to you. You can withdraw your consent at any time here. More information about this balancing of interests can be found [here](#).

e. For account management, promotional and marketing purposes

We process your personal data for account management, promotional and marketing purposes. In doing so, we use data we have obtained from your company and/or you, such as payment data and your activity on our website, as well information not obtained directly from you, including public registers (such as the Chamber of Commerce), publicly available sources (such as the internet) and other parties (such as data brokers).

- We may use your data to inform you about a product from Rabobank, her group divisions or third parties that might be of interest to you.
- We produce analyses and profiles for marketing and account management purposes. This allows us to combine your existing products from the bank with data relating to your visit to our [website](#) so that we can display information that is relevant to you, for example by presenting specific offers on banners on our website or an announcement in the Rabo app.
- We also use the services of advertisers in order to display advertisements to a specific target group. We indicate which target group or type of profile our advertisement is intended for. The advertiser then displays the advertisement to the people who are in the target group or fulfil the profile. We never share data relating to individual clients with such advertisers. We process your data together with [providers of social network services](#) if, for example, you post comments, videos, photos, likes and public messages on our social media company pages or post comments about Rabobank on a website or social network that we do not manage. We use your data to post a comment or to share information. For the processing of the data by the provider of social network services, we refer you to the website of these providers.
- We may also use analyses to provide our clients with information for benchmarking purposes. If we use your data for these analyses or produce profiles, we will ensure that your data are pseudonymised to the

greatest possible extent and that they are made only available to a few employees at the bank. If you do not want your data to be used by us for the purpose of direct marketing or by post, e-mail or telephone, you can contact your relationship manager.

Legal basis

We process your data because we have a legitimate interest in this. We may also request your consent to process your data for promotional and marketing purposes. If you do not give your consent, this will not affect the services we provide to you. You can always withdraw your consent. More information about can be found [here](#).

f. To enter into and perform agreements with suppliers and other parties we work with

If you have contact with Rabobank for work-related reasons, we may process your personal data, for example so that we can establish whether you are permitted to represent your business, or so that we can give you access to our offices. Where necessary, we may consult [incident registers and warning systems](#) before we enter into our agreement and also while the agreement is in effect in the context of screening.

Legal basis

We process your data so that we can perform the agreement we have concluded, because we are required to do so by law or because we have a legitimate interest in this. More information about this balancing of interests can be found [here](#).

g. To comply with legal obligations

Legislation

Under various national and international legislation and regulations, we have to collect and analyze a large amount of data relating to you and sometimes transfer such information to European and other government authorities. We must comply with legislation, such as the Wet Financieel Toezicht (Dutch Financial Supervision Act), in order to be able to offer your company and/or you financial products and services. We also process personal data in order to fulfil our duty of care. We also have to comply with legislation designed to combat fraud, crime and terrorism, such as the Wet ter voorkoming van Witwassen en Financieringen van Terrorisme (Dutch Money Laundering and Terrorist Financing (Prevention) Act. For example, we are required to perform customer due diligence and to conduct further inquiries if you hold specific assets or if an unusual transaction takes place in your account. If we spot an unusual transaction, we must notify the competent law enforcement agency. Under this law, we have to establish who the ultimate beneficial owner (UBO) is of a business or organization with which we have a business relationship. We might cooperate with other banks on this. We may receive requests for data from the (Dutch) Tax and Customs Administration, the police and the Public Prosecution Service as well as organizations such as the intelligence services. If they do this, we are required by law to cooperate with the investigation and transfer data relating to you. We might enter into partnerships with for example Police or the Public Prosecution Service to prevent large scale fraud, money laundering and financing of terrorism.

Providing data to the government

Legislation and regulations may require that we transfer data (analysed or otherwise) relating to you to a government institution, a tax authority or a regulator within or outside the Netherlands, such as the European Central Bank (ECB). As we have to comply with legal obligations and treaties, we sometimes have to provide data relating to you to the national tax authorities or a foreign tax authority.

Risk models

European rules require that we produce risk models if your company and/or you apply for a loan or credit or if your company and/or you have received a loan or credit from us. This is so that we are able to determine which risks Rabobank is exposed to and the size of the buffer we need to maintain. We process your personal data for this purpose within Rabobank Group. We also need to use these models to prevent situations in which you are unable to repay your financing, or are unable to repay it on time. Also in case of financing, to calculate the price you have to pay we might use these models. We are

required to do this by law. In this context, we may also use profiling and techniques for making decisions in an almost fully, automated manner. These risk models also predict how likely it is that you will fall behind on your payments. We can use the information they provide to prevent or deal more quickly with any payment problems, for example in consultation with you. We will then process your personal data within Rabobank Group for this purpose. We will do this for various reasons. These include performing our agreement with you and because we are required to do this by law.

Providing data to the government

Legislation and regulations may require that we transfer data (analyzed or otherwise) relating to you to a government institution, a tax authority or a regulator within or outside the Netherlands, such as the Netherlands Authority for the Financial Markets (AFM), the European Central Bank (ECB) or the Dutch Central Bank (DNB). As we have to comply with legal obligations and treaties, we sometimes have to provide data relating to you to the Dutch Tax and Customs Administration or a foreign tax authority.

Making and documenting recordings

We make recordings of telephone conversations, e-mail messages and online chat sessions, for example, and may document these recordings. We do this to comply with legal obligations, for example in the context of investment services. We may also do this to provide proof, to monitor quality, to combat and investigate fraud, and to train, coach and assess employees.

Legal basis

We process your data because this is required by law, or because we would otherwise not be permitted to perform an agreement with you, or if we have a legitimate interest in processing your data so that we can comply with a statutory or other legal obligation. More information about this balancing of interests can be found [here](#).

h. To carry out business processes and for the purpose of management reports and internal management

Know your customer

As a service provider, we believe it is important and necessary that we have a good picture of our clients. This includes knowing who your company and/or you work with.

Determining credit risk associated with loans and credit facilities

Lending involves credit risk. We have to determine what that risk is, so that we can calculate the buffer we need to maintain. In connection with this, we process data relating to your loans and credit facilities.

Transfer of receivables

It can happen that we transfer to another party loans that we have made to your company and/or you, such as your loan. If such a transfer takes place, your personal data will be processed. We may need to disclose your personal data in the course of a transaction to a prospective buyer or acquirer both to facilitate the potential and actual transfer. Once the loans have been transferred, the other party will also process your personal data. We agree with the other party that it must comply with legislation and regulations on personal data protection. We also do this when a contract is taken over, or in case of merger or demerger.

Audits and investigations

We also use your data to perform our internal and external audits and investigations or a third party we call in, for example in order to examine how well new rules have been introduced or to identify

Improving our own business processes

We also use data to analyze and improve our business processes so that we can help your company and/or you more effectively or make our processes more efficient and create management reports. We will validate our models before using it. Where possible, we will pseudonymize your data first.

Legal basis

We process your data because this is required by law or because we have a legitimate interest. Processing your personal data may also be necessary for the performance of our agreement with you. More information about this balancing of interests can be found [here](#).

i. For archiving purposes, scientific or historic research purposes or statistical purposes

We may also process your personal data if this is necessary for archiving purposes in the public interest, scientific or historic research purposes or statistical purposes. We might use universities and research institutes to help us with that. Where possible, we will pseudonymize your data first.

Legal basis

When processing personal data for archiving purposes, scientific or historic research purposes or statistical purposes, we process the data on the basis of the legitimate interest of Rabobank, the financial sector or our clients and employees. More information about this balancing of interests can be found [here](#).

7. How long does Rabobank keep your personal data?

We do not keep your data for any longer than necessary to fulfil the purposes for which we collected the data or the purposes for which data are reused. We have adopted a data retention policy. This policy specifies how long we keep data. In the Netherlands, this is usually for seven years following the termination of the relevant agreement or the ending of your business relationship with Rabobank. Data are sometimes kept for longer, for example if the regulator asks us to keep specific data for longer in the context of risk models. In some cases, we use shorter retention periods. For example we generally keep data relating to payment instructions for only two years and camera images are kept for only four weeks. In specific situations, we may also keep data for longer than we are required by the retention period fixed by us. We will do this if, for example, the judicial authorities request, in which case we will keep the camera images for longer than four weeks, or if you have submitted a complaint, in which case the underlying data must be kept for longer. Once we no longer require the data for the purposes described in sections 6a to 6i, we may still keep the data for archiving purposes, in the event of legal proceedings, or for historic or scientific research purposes or statistical purposes.

8. Does Rabobank also process special categories of personal data, information about criminal convictions and citizen service numbers (BSNs)?

Special categories of personal data, information about criminal convictions and citizen service numbers (BSNs) in the Netherlands are sensitive data. Special categories of personal data include data concerning health, biometric data and data which reveal racial or ethnic origin. We may use biometric data, such as your fingerprint or a face scan, for identification and authentication purposes. We use your national identification number (BSN) only if this is permitted by law. The same goes for your Tax Identification Number (TIN) which we may need to pass on to a relevant Tax Authority.

We participate in [incident registers and warning systems](#) for the financial sector and may process information about criminal convictions in this context. The purpose of these incident registers and warning systems is to protect the interests of financial institutions and their clients, for example by detecting and recording cases of fraud. In addition, we process special categories of personal data where this is permitted by law, because this information was made public by you, or with your permission. We ask for your consent to record this information. If you give us consent to record special categories of personal data relating to you, or you have made this information public yourself, we will only process the information if this is necessary so that we can provide our services. If you have given us consent to

record special categories of personal data, you may withdraw that consent at any time. To do this, contact your own Rabobank.

9. Does Rabobank use automated individual decision-making including profiling?

Automated individual decisions are decisions that are taken regarding your company and/or you by computers and not by human beings. Does such a decision produce legal effects concerning you or does this decision similarly affect you, then we are not allowed to use automated decision-making. Unless this is necessary to enter into or perform a contract, this is authorised by law, or if you give us your explicit consent. In that case you have the right to obtain human intervention and to express your point of view and contest the decision. In the following situations we might use automated decision making that might affect you:

- If necessary, we will calculate a credit score from you. We are obliged to use these credit scores in the decision whether or not we can provide you with a credit. This score is then used by authorized staff to determine whether or not you might obtain credit. The decision to provide you a credit is not fully automated.
- When a payment has been done that is not in line with your usual pattern of spending, we might use automated decision making and stop the payment (temporarily). We do this to avoid fraud on your account. If we stop the payment, we will inform you as quickly as possible.

10. Which people have access to your data?

Within Rabobank, your personal data can be accessed only by individuals who need to have access owing to their position. All of these people are bound by a duty of confidentiality.

11. Do we use personal data for any other purposes?

If we want to use information for any purpose other than the purpose for which it was obtained, we may do this as long as the two purposes are closely related. If there is not a sufficiently strong connection between the purpose for which we obtained the data and the new purpose, we will ask you to give your consent if we still want to use this data. You can always withdraw your consent. You can contact your relationship manager for this.

12. Does Rabobank transfer your personal data to other parties and to other countries outside the EU?

a Within Rabobank Group

Your personal data may be shared with [divisions of Rabobank Group](#), for example because you ask us to do this, or because you also purchase a product from a different division of Rabobank. Information that has been used to establish your identity may also be used by another division of Rabobank with which you want to do business, for example. We can also, for example, exchange your data to combat fraud, to prevent money laundering, risk management, internal administration, to improve services to you and in the context of the duty of care. These divisions of Rabobank may also be located in [countries](#) outside the European Union that apply less stringent data protection rules. We share your data with divisions of Rabobank Group, in which Rabobank holds a majority interest, only if the divisions comply with Rabobank's rules, as set out in the Rabobank Privacy Code. The [Rabobank Privacy Code](#) describes the rules that all these divisions of Rabobank Group have to comply with. The Rabobank Privacy Code guarantees adequate protection of personal data.

b Outside Rabobank Group

Your data is also transferred to other parties outside Rabobank if we are required to do this by law, because we have to perform an agreement with your company and/or you or because we engage another service provider.

Competent Authorities

We transfer your personal data to third parties if we are required to do so. Examples of such third parties include national and European regulators, such as the Netherlands Authority for the Financial Markets (AFM), the Dutch Central Bank (DNB), Authority for Consumers & Markets (ACM), the European Central Bank (ECB) and the Dutch Tax and Customs Administration. In order to comply to the 'ethical Code of Conduct for the Dutch banking industry', we sometimes have to provide personal data to the Foundation for Banking Ethics Enforcement (Stichting Tuchtrect Banken). If your company and/or you file a complaint at KIFID or the Dutch Data protection authority (AP), we might have to provide them your personal data. The Dutch Tax and Customs Administration, the police and the prosecutor's office, but also an intelligence agency or a benefit agency could ask us to provide information. We have a legal obligation to cooperate on investigations and provide them your data.

Our service providers

We also transfer data if this is necessary in order to perform our agreements with your company and/or you. For example, we use third parties such as SWIFT to enable you to make payments. When a payment is made to another bank or via another bank within the European Union (EU) or outside the EU, they may request your data because they are (legally) obliged to do so. In those cases we will, apart from the usual data we provide when a payment is made, transfer additional data such as your date of birth and your place of residency. These third parties and other banks are subject to supervision by their local regulators. This could mean that your payment and transaction data are transferred to other parties in countries that do not enjoy the same level of personal data protection as the European Union. If your personal data are processed in a country with a different level of data protection, this may mean that your personal data are the subject of investigations by competent national authorities in the countries where the relevant information is held. We also provide your company and/or your data to other parties that we need to involve in the context of providing our services, such as bailiffs, lawyers, accountants, collection agencies and consultants. If you are placed under administration, we might have to provide your data to your administrator. Sometimes you can take the initiative and transfer your data to another party yourself. For example if you want a third party to be able to verify your identity through IDIN, or if you want to provide access to your data to another party, such as an account information service provider.

Intermediaries

If we act as an intermediary, we may share your personal data. For example, if you take out insurance with an insurer through us, we may need to share personal data with that insurer. We might also receive data from the insurer. If you issue a financial product at Rabobank via an intermediary, we receive your personal data from the intermediary and we will need to send your personal data to the intermediary.

Business partners/other parties

We sometimes engage other parties / business partners that process personal data on our instructions. Examples include printers that handle client mailshots for us and print names and addresses on envelopes, parties that perform market research on Rabobank's behalf, and parties that store data for us. Before such parties are engaged, we must first ensure they are sufficiently reliable. We may only engage parties if this is in keeping with the purpose for which we processed your personal data, for example for promotional and marketing purposes. Moreover, this other party can be engaged by us only if it reaches specific agreements with us, has demonstrably implemented appropriate security measures and guarantees that your personal data will remain confidential. Your personal data may also be shared with other parties that we engage in the course of our business or for the provision of our services. If we transfer your data to other parties outside the European Union, we take additional measures to protect your data. In some countries outside the European Union, the rules for protecting your data are different from those that apply within Europe. Than we assess as good as possible whether this can be done safely. For some countries, the European Commission has determined that there is an 'adequate' level of

protection for personal data. For other countries, we use the standard contractual clauses approved by the European Commission. In addition, we take additional (safety) measures if necessary.

13. What rights do you concerning your personal data held by us?

a Right to information

This Privacy Statement describes what Rabobank does with your data. In certain cases, we provide additional or different information. For example, if Rabobank records your personal data in its incident registers, it will inform you about this separately (provided it is permitted to do so). We will also do this if there are other reasons for providing you with information in addition to the Privacy Statement. We may do that by means of a letter, by leaving a message in your secure inbox or in another way to be determined by us.

b Right of access to and to rectification of personal data

You may ask us whether we process data relating to your company and/or you, and if so, which data this concerns. In that case, we can provide you with access to the data processed by us that relates to you. If you believe your personal data has been processed incorrectly or incompletely, you may request that we change or supplement the data (rectification).

c. Right to erasure ('right to be forgotten')

You may request that we erase data concerning yourself that we have recorded, for example if you object to the processing of your personal data. We don't always have to do that. And sometimes we are not allowed to do this either. For example, if we still have to store your data due to legal obligations.

d. Right to restriction of processing

You may request that we temporarily restrict the personal data relating to you that we process. This means that we will temporarily process less personal data relating to you.

e. Right to data portability

You have the right to request that we supply you with data that you previously provided to Rabobank in the context of a contract with us or with your consent, in a structured, machine-readable format, or that we transfer such data to another party. If you ask us to transfer data directly to another party, we can do this only if this is technically feasible. In some cases, you do not need to submit a request to obtain the data you provided to us. For example, you can view your transaction data using our online services.

f. Right to object to processing

If we process your data because we have a legitimate interest in doing so, for example if we make recordings of telephone calls but this is not required by law, you may object to this. In that case, we will reassess whether it is indeed the case that your data can no longer be used for that purpose. We will stop processing your data if your interest outweighs our interest. We will inform you of our decision, stating the reason.

g. right to object to direct marketing

You have the right to request that we stop using your data for direct marketing purposes. It may be the case that your objection relates to being approached through a specific channel, for example if you no longer wish to be contacted by telephone but still want to receive our newsletters. We will then take steps to ensure you are no longer contacted through the relevant channel.

14. How can you use your data subject rights?

You can use your rights by reaching out to your relationship manager. If you make a request, we will respond no later than one month after we receive your request. We may ask you to explain your request for access in more detail. For example, if you request access to recorded calls, we may ask you to provide search keys, such as the time the call was made and the number from which it was made. In very specific cases, we may extend this period in which we must respond to a maximum of three months. In that case, we will keep you informed about the progress made with your request. If you make a request, we may ask you to provide proof of your identity. For example, if you submit a request to exercise your right of access or right to data portability, we would like to be certain that we provide your personal data to the right person. In that case, we will ask you to come to the bank so that you can make your identity known and we can verify your identity. In some cases, there may be doubts as to whether we can send

you the data securely. If so, we may ask you to come to the bank to collect your data. In certain cases, we may not be able to comply with your request, for example because this would violate the rights of others, would be against the law or is not permitted by the police, the Public Prosecution Service or another public authority, or because we have weighed up the relevant interests and determined that the interests of Rabobank or others in processing the data take precedence. In that case, we will inform you. If we adjust your data or erase your data at your request, we will notify you of this and also inform the recipients of your data wherever possible.

15. Where can you go to in case of a question or complaint?

Do you have a general question or complaint on the processing of personal data? Please contact your relationship manager.

16. What can you approach our Functionaris Gegevensbescherming (FG) for?

Rabobank has appointed a FG. The FG monitors the application and compliance with the Algemene Verordening Gegevensbescherming (AVG or GDPR). Are you not satisfied with the way a question or complaint has been settled? You may contact the FG via dpo@rabobank.nl. You also have the possibility to ask a question or file a complaint at the [Dutch Data Protection Authority \(AP\)](#).

17. Can we change this Privacy Statement?

Yes, our Privacy Statement may change from time to time. This is possible if there are new data processes and these changes are important to you. We will of course keep you informed. You can always find the most current version of our Privacy Statement at: rabobank.com/privacy.