

Your privacy is extremely important to us. This Privacy Statement contains detailed information about how we handle your personal data and about your rights in relation to your personal data.

1. We handle your personal data with due care

Delen Private Bank NV (“Delen Private Bank”, “the Bank” or “we”), whose registered office is located at Jan Van Rijswijcklaan 184, 2020 Antwerp, Belgium, is a credit institution specialised in discretionary asset management.

In this capacity, the Bank is responsible for processing personal data relating to clients and potential clients. “Processing” encompasses all possible operations performed with these personal data, including collection, recording, use and storage.

We always handle personal data with due care. We wish to point out that we have never sold, and will never sell, your personal data to third parties.

2. Which personal data do we process?

If you are a client of Delen Private Bank, the Bank processes various categories of personal data. These may include the following:

- your identification data (including your surname, first name, address, place of birth and date of birth);
- your contact details (such as your telephone number and e-mail address);
- financial information (including account numbers, financial details, transaction details and your general patrimonial situation);
- your family situation (including marital status, household structure, relationships);
- your interests;
- images recorded by our security cameras and recordings of telephone calls;
- public information and information we obtain through third parties (including information from the National Bank of Belgium’s Central Individual Credit Register (Centrale voor kredieten aan particulieren/Centrale des crédits aux particuliers) or information obtained from external companies that we use to complete our files).

In certain situations, the Bank holds personal data relating to individuals connected to you (such as your children under the age of majority if you open an account for them with us, or contact persons for your account). Sometimes we do not have direct contact with these individuals. When you provide information about such individuals to us, we ask that you notify them about this.

Finally, the Bank may, under certain conditions, hold specific personal data relating to you even if you are not yet a client of ours.

3. Why does Delen Private Bank process personal data?

The Bank processes your personal data to ensure the provision of adequate services to you. More specifically, the Bank processes your personal data for the following purposes:

- to be able to contact you;
- to fulfill our legal obligations (for instance in the context of anti-money laundering legislation and combating terrorism, MiFID II or regulations relating to financial planners)
- to enable us to perform our contracts properly (including with respect to the management of your accounts, estate planning, credit monitoring and the execution of transactions);
- to enable us to improve our services;
- to prevent and detect misuse and fraud and to take appropriate action;
- to compile statistics and to perform tests;
- for commercial prospecting or direct marketing purposes, unless you object to this.

4. How long do we keep your personal data?

The period for which personal data are kept varies, depending on the category of personal data. The Bank only processes personal data if the processing operation has a clear purpose (such as in the context of the performance of a contract or on the basis of the Bank's legal obligations). In connection with the exercising of your rights and our rights, we may keep personal data for longer than the statutory retention periods.

5. Can we transfer your personal data to other parties?

Delen Private Bank will not sell your personal data to third parties.

Personal data relating to clients introduced to us by Bank J. van Breda may be transferred to that bank. Bank J. van Breda may use the personal data for purposes including the following:

- to prevent misuse and fraud;
- to compile statistics and to perform tests; and
- in the context of providing commercial services, such as when we act as a third-party pledgee.

Moreover, the Bank may – in the context of outsourcing certain tasks – transfer information to carefully selected third parties that process specific personal data on the instructions of the Bank. In this context, the Bank appeals only to third-party processors which she considers to provide sufficient guarantees as regards personal data protection. These third parties are committed to guaranteeing the confidentiality of personal data.

Finally, under Belgian and international legislation, the Bank must share specific information relating to its clients with clearly specified bodies (including the National Bank of Belgium and its Central Point of Contact (Centraal aanspreekpunt/Point de contact central). In this context, we wish to emphasise that discretion is extremely important to us and that we comply with such requests only if they are based on a statutory provision or legitimate interest, or if this is necessary for the performance of the contract.

When the Bank uses third-party processors, personal data may end up in a country outside the European Economic Area (EEA). We may transfer personal data to that country if, in the opinion of the European Commission, the country provides a suitable level of data protection. In situations where this is not the case, the Bank may either rely on a derogation that is applicable in a specific situation (e.g. in case of an international payment, it is necessary to transfer information so that the payment can be executed) or provide the necessary guarantees to ensure your personal data are adequately protected (e.g. by including the standard contractual clauses, as issued by the European Commission or the data protection authority, in contracts with such third parties).

6. Your rights as an individual

You have a number of rights as regards the personal data processed by the Bank. These are described below.

- ***You may access your personal data***

You have the right to access the personal data we process in relation to you at any time. If you so wish, you can obtain a copy of the personal data we hold on you.

- ***You may request the rectification of your personal data***

If and insofar as we hold incorrect or incomplete personal data relating to you, you have the right to request that changes are made to your personal data.

- ***You may request the removal of your personal data***

If you suspect that the Bank processes certain personal data unlawfully, you have the right to request the removal of the relevant personal data. We will comply with this request unless the processing operation is necessary for compliance with the law or for fulfilling our contractual obligations.

- ***You may request that your personal data are transferred to a third party***

You also have the right to ask the Bank to supply you with the personal data that you provided to it, or to ask the Bank to transfer the personal data to a third party.

- ***You may object to a specific use of your personal data***

You have the right to object to a specific use of your personal data at any time. We will comply with this request unless the processing operation is necessary for compliance with the law or for fulfilling our contractual obligations.

7. How can you exercise your rights?

To exercise your rights, write to Delen Private Bank NV, Jan Van Rijswijcklaan 184, 2020 Antwerp, Belgium, for the attention of the Data Protection Officer, or send an e-mail to privacy@delen.be.

The Bank reserves the right to request payment from parties whose requests to exercise their rights are excessive.

Among other things, the Bank may ask you to submit a photocopy of your identity card so that it can verify your identity. The Bank does this to ensure that no-one else exercises your rights.

Every request to exercise a right that you send to the Bank will be dealt with and answered as soon as possible, and no later than one month following receipt of the request.

This one-month period may be extended by two months, depending on the complexity of the request or the number of requests involved. In that case, the Bank will in any event notify you of the extension no later than one month following receipt of your request.

Should the Data Protection Officer decide that a request cannot be complied with, he/she will notify you no later than one month following the receipt of your request. You will be informed of the reasons for that decision.

If you do not agree with the Bank's opinion, you may submit a complaint to the Belgian data protection authority or lodge an appeal with the competent courts at any time.

8. You can contact us at any time for additional information

Delen Private Bank may modify this Privacy Statement. The most recent version is always available online at www.delen.be. You will be informed of significant changes to the text of this policy through the usual channels.

More information about privacy legislation in general can be found on the website of the Belgian data protection authority (www.privacycommission.be).

If you have any further questions, you can of course contact the Bank.

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