

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 the participant of the Competition – 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 administrator of your personal data, contact details of the Bank and our Data Protection Officer.

The Administrator 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.ing.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@ing.pl.

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 can object to specific data processing. The Bank will consider the legitimacy of the objection. You give all consents voluntarily. You can always withdraw all or some of your consents regarding the processing of personal data. The withdrawal of a given consent does not affect the Bank's right to process data for the purpose described in that consent until it is withdrawn.

4. Why do we process your personal data?

The Bank processes your data to:

- a. consider the application and participation in the Competition called "Lion's Den ING Modelling Challenge" and provide current information about them, including the

- announcement of results, issuance of Prizes, and handling of any possible complaints and claims related to the organization and course of the Competition - the legal basis for data processing is legitimate interest in connection with the Competition Rules;
- b. provide information on recruitment processes, processed by the Administrator- the legal basis for data processing is legitimate interest in connection with the Competition Rules;
 - c. fulfill the Administrator's legal obligations in connection with conducting the Event, including those arising from tax laws, regulations on accounting;
 - d. to promote the Event and build a positive image of the Organizer in public space and in the media - the legal basis for processing is the legitimate interest of the Administrator based on the authorisation obtained to disseminate the image;
 - e. execute any other legitimate interests of the Administrator, 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 data processed?

We process the following data related to:

- a. participation in the Competition: first name, last name, email address, phone number, educational information, team name, t-shirt size, food preferences, optional image,
- b. informing about recruitment processes: name, surname, e-mail address, phone number;
- c. complaints: first name, last name, mailing address and phone number, unless the complaint concerns other data.

6. What are the categories of the Data Recipients?

Personal Data may be also disclosed to:

- a. the tax authorities, Jury Members to the extent necessary for the execution of the Competition, the award of the Prize and the Additional Prize;
- b. ING Hubs B.V., a company incorporated and operating under the laws of the Netherlands with its registered office in Amsterdam, the Netherlands, operating in Poland in the form of a branch, under the name ING Hubs B.V. Spółka z ograniczoną odpowiedzialnością Oddział w Polsce with its registered office in Katowice, Zabrska 19 Street, 40-083 Katowice in connection with the organization of the selected event;
- c. Bespoke Sp. z o.o. with registered office in Warsaw, 6A Goplańska Street, 02-954 Warsaw in connection with the organisation of the Competition;
- d. entities to which the transfer of certain data (e.g. image) proves necessary for the performance of obligations under the Competition Rules;
- e. entities who are recipients and are authorized by law
- f. whom the transfer of data is necessary for the performance of a specific activity, e.g. conducting an audit, conducting a tax inspection.

In connection with the Bank's use of social media, social media may transfer your personal data outside the European Economic Area, including to the United States. The transfer of data may take place on the basis of Standard Contractual Clauses adopted by the European Commission or on the basis of other appropriate safeguards required by law.

By decision of the European Commission, the United States ensures an adequate level of protection of personal data transferred by private and public entities from the territory of the European Economic Area (EEA) to organisations in the United States, which comply with the EU-US Data Protection Framework. The list of these organisations was published by the U.S. Department of Commerce.

7. 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 for the recruitment processes – will be stored for a period of 2 years;
- c. that are processed for the purpose of fulfilling legal obligations – will be processed until these obligations are fulfilled;
- d. 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.

8. Know the rights you have concerning the Bank

You or the participant of the Competition have the right to access the data provided, the right to rectify it when it is outdated or inconsistent with reality, to request its deletion or restriction of data processing, and the right to data portability or to obtain a copy of the data, except that this right must not adversely affect the rights and freedoms of others, including trade secrets or intellectual property, and will be exercised in a technically feasible manner. Personal data will not be subject to automated decision-making, including profiling. You have the right to object where the law provides for this.

9. Information on the requirement to provide data

Providing personal data is voluntary, but without providing it, it will not be possible to participate in the above-mentioned Competition.

10. Final stipulations

You may exercise the rights that the Regulation provides for you under the terms of the Regulation and in accordance with other laws.

This information implements a legal obligation.