

**KBC Bank  
Ireland plc  
Data Protection  
Policy**

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**Data Protection Policy**

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## 1. Overview & Objectives

### Overview

KBC Bank Ireland plc (“KBCBI”) respects each individual’s privacy and data protection rights and complies with its obligations under the Data Protection Acts 1988 and 2003.

The Data Protection Acts 1988 and 2003 (the “Data Protection Acts”) lay down strict rules about the way in which personal data and sensitive personal data are collected, accessed, used and disclosed. The Data Protection Acts also permit individuals to access their personal data on request, and confer on individuals the right to have their personal data amended if found to be incorrect.

This document outlines KBCBI’s policy to help ensure that we comply with the Data Protection Acts.

### Objective

This policy is a statement of KBCBI’s commitment to protect the rights and privacy of individuals in accordance with the Data Protection Acts.

## 2. Scope

This policy applies to all employees (including contractors and temporary personnel) of KBCBI and its subsidiaries who process personal data/sensitive personal data of individuals including clients.

## 3. Definitions

Unless defined otherwise, the following definitions are used for this policy:

Data	means automated and manual data
Data Protection	Is the safeguarding of the privacy rights of individuals in relation to the processing of personal data, in both paper and electronic format.
Personal Data	means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.
Processing	processing, of or in relation to information or data, means performing any operation or set of operations on the information or data, whether or not by automatic means, including: (a) obtaining, recording or keeping the information, or (b) collecting, recording, organising, storing, altering or adapting the information or data, (c) retrieving, consulting or using the information or data (d) disclosing the information or data by transmitting, disseminating or otherwise making it available, or (e) aligning, combining, blocking, erasing or destroying the information or data
Sensitive Personal Data	means personal data as to – (a) the racial or ethnic origin, the political opinions or the religious or philosophical beliefs of the data subject, (b) whether the data subject is a member of a trade union

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	<p>(c) the physical or mental health or condition or sexual life of the data subject</p> <p>(d) the commission or alleged commission of any offence by the data subject, or</p> <p>(e) any proceedings for an offence committed or alleged to have been committed by the data subject, the disposal of such proceedings or the sentence of any court in such proceedings.</p>
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## 4. Data Protection Policy

### 4.1 Collecting information about individuals, including clients

We collect and use information to provide the following services:

- to provide credit and investment services;
- to undertake advertising, marketing, direct marketing and public relation exercises;
- to perform accounting and other record-keeping functions;
- to provide personnel, payroll and pension administration services.
- to provide clients with online services.
- to comply with our legal obligations.

### 4.2 Data Protection Principles

We shall perform our responsibilities under the Data Protection Acts in accordance with the following eight Data Protection principles:

1. **Obtain and process information fairly**  
We shall obtain and process personal data fairly and in accordance with statutory and other legal obligations.
2. **Keep it only for one or more specified, explicit and lawful purposes**  
We shall keep personal data for purposes that are specific, lawful and clearly stated. Personal data will only be processed in a manner compatible with these purposes.
3. **Use and disclose only in ways compatible with these purposes**  
We shall use and disclose personal data only in circumstances that are necessary for the purposes for which we collected the data. Where we wish to use personal data for marketing purposes, appropriate consents must be obtained from the clients/potential clients.
4. **Keep it safe and secure**  
We shall take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of personal data and against its accidental loss or destruction. This includes adopting enhanced security measures where personal data is being stored or processed outside of a secure KBCBI office location (e.g. encryption of laptops etc).
5. **Keep it accurate, complete and up-to-date**  
We adopt procedures that ensure high levels of data accuracy, completeness and ensure that personal data is up-to-date.
6. **Ensure it is adequate, relevant and not excessive**  
We shall only request and retain personal data to the extent that it is adequate, relevant and not excessive.

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**7. Retain for no longer than is necessary**

We have a retention policy for personal data.

**8. Give a copy of his/ her personal data to that individual, on request**

We adopt procedures to ensure that data subjects can exercise their rights under the Data Protection Acts to access their data.

**4.3 Sensitive Personal Data**

Sensitive personal data will be held, only where necessary, in order to process mortgage/credit/ investment/savings business. It may also be held for employment purposes if employed by KBCBI. Except in the narrow exceptional cases set out in the Data Protection Acts, explicit consent will be obtained from the client in line with the Data Protection Acts in order to process such data.

**4.4 Responsibility**

All employees and contractors of KBCBI who separately collect, control or process the content and use of personal data are individually responsible for compliance with the Data Protection Acts. The Compliance Department co-ordinates the provision of support, assistance, advice, and training throughout KBCBI and its subsidiaries to ensure compliance with the legislation.

**4.5 Procedures and Guidelines**

KBCBI is firmly committed to ensuring personal privacy and compliance with the Data Protection Acts, including the provision of best practice guidelines and procedures in relation to all aspects of Data Protection.

**4.6 Access Requests**

KBCBI's Personal Data Access forms are located on our website at [www.kbc.ie](http://www.kbc.ie).

**4.7 Privacy Statement**

KBCBI's Privacy Statement can be found on our website at [www.kbc.ie](http://www.kbc.ie).

**4.8 Data Exchange within the KBC Group**

Personal data can be exchanged within the entities of the KBC Group, both within and outside the European Union.

**5. Enforcement**

This policy applies to all employees (including contractors and temporary personnel) of KBCBI. In the event that any change is made to Data Protection legislation or regulation, this policy will be reviewed, updated and ratified.

Adherence to this policy is the responsibility of line management and will be subject to review by the Compliance and Internal Audit Departments of KBCBI.

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## 6. References

For further information relating to Data Protection and Access Request requirements please refer to:

- The Data Protection Acts 1988 and 2003 (available at the Data Protection Commissioner's website [www.dataprotection.ie](http://www.dataprotection.ie))
- KBCBI Personal Data Access Request Procedure
- KBCBI Website Privacy Statement

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