



Rabobank

Privacy Statement

Rabobank Group processes personal data. We wish to inform you about this clearly and transparently. This privacy statement will answer your most important questions about the processing of personal data by Rabobank and our group divisions in the Netherlands.

In this privacy statement we will use certain terms. Below is an explanation of those terms.

- Personal data: data that directly or indirectly identify you. Examples are your name and address, but also your income.
- Processing: any acts that can be performed in relation to personal data. These may include collection, but also storage, use and removal of your data from our records.

1. Whose personal data are processed by Rabobank?

We process personal data of persons with whom we have, wish to have, or used to have, a direct or indirect relationship. These may include personal data of:

- clients and their representatives;
- persons who show an interest in our products and services; or
- persons who are associated with a business or organisation with which we have, wish to have, or used to have,

a relationship.

Please note: if your business or organisation provides us with personal data of employees, you are under the obligation to inform your employees thereof. You may provide them with this privacy statement, so that your employees can see how we treat their personal data.

To protect your interests as well as our own, we may process third-party personal data. We may do so, for example, for purposes of fraud control.

2. Who is responsible for the processing of my personal data?

All Rabobank Group divisions process personal data. Rabobank Group comprises Rabobank and various subsidiaries globally. Any reference in this privacy statement to Rabobank will refer to Rabobank Group.

The key Rabobank locations and subsidiaries in the Netherlands are:

- Coöperatieve Rabobank U.A.
- Rabohypotheekbank N.V.

- Rabo Groen Bank B.V.
- Rabo Financieringsmaatschappij B.V.
- Rabo Herverzekeringsmaatschappij N.V.
- Rabo Vastgoedgroep (including Rabo Bouwfonds Holding N.V., Bouwfonds Investment Management B.V., BPD Europe B.V. and Rabo Eigen Steen Holding B.V.)
- De Lage Landen International B.V.
- Obvion N.V.
- Orbay B.V.

If you wish to know what Rabobank division is responsible for the processing of your personal data, please contact the Rabobank division that you do business.

3. For what purposes does Rabobank process personal data?

We process personal data for the following purposes:

a. To be able to enter into a relationship with you

If you wish to become a Rabobank client, or if you wish to purchase a new product or a new service, we will require personal data. For example, we will have to carry out an investigation to review whether we can accept you as a client, or whether we can provide you with a loan. To that end, we can also use data about you that we receive from others. For example, from the Dutch Credit Registration Office (BKR). Furthermore, when entering into a relationship with you, we may make a copy of your identity document.

b. To maintain the relationship with you and to execute orders

If you are a Rabobank client, we want to provide you with quality service. For that purpose, we process personal data. We can make (audio, video and chat) recordings for the purpose of providing evidence, combating criminal activities and monitoring quality. We will use your name and address details, for example, to maintain contacts with you. Furthermore, we need your name to be able to execute your

payment orders. We may also disclose your data to others, e.g. in the context of payment transactions, or if you ask us to, to make yourself known.

c. To protect your interests as well as our own

To protect your interests as well as our own and the security and integrity of the financial sector, we may process personal data. For instance, to combat or investigate fraud. For this purpose, we may consult, and enter personal data in, the incident registers, like the so called Extern Verwijzingsregister, and alert systems of the financial sector. Furthermore, we may also for this purpose consult public sources such as public registers, newspapers and the Internet.

d. For purposes of development and improvement of our products and services

In order to be able to continue to provide you with quality service, we are constantly developing and improving our products and services. In some cases, this may involve the processing of personal data, for example if you have a question about a product.

e. For promotional and marketing purposes

We may process your personal data for promotional or marketing purposes. For example, to inform you about a new product that may be of interest to you, or to better anticipate your wishes.

If you do not wish to be contacted for commercial purposes, please notify the Rabobank division that you do business with.

f. Conclusion and execution of agreements with suppliers and corporate clients

If you have business contacts with Rabobank, we may process your personal data. For example to be able to ascertain that you are authorised to represent your company. Or to grant you access to our offices.

g. To perform statutory obligations

We are required by certain national and international laws and regulations to collect data about you. For example, pursuant to the Dutch Money Laundering and Terrorist Financing (Prevention) Act (WWFT), we are required to initiate a (further) investigation if you have certain assets or in the event of an unusual transaction in your account. Furthermore, the WWFT requires us to ascertain who the ultimate beneficial owner (UBO) is of a company with which we have a relationship.

Laws and regulations may also require us to disclose data about you to a government or regulatory body, e.g. the Netherlands Authority for the Financial Markets or the Dutch Central Bank. In order to fulfill legal requirements and conventions, we sometimes have to disclose personal data to tax authorities within or outside the Netherlands. In addition, based on our duty of care, we are required to process personal data whenever there is cause to do so.

h. For purposes of our operations

As a financial service provider, it is important to us, and necessary, to have a good overview of our client relations. That includes knowing whether you collaborate with other parties that may pose a risk. To obtain such overview, and to take measures, we process personal data, e.g. in order to assess our risk when providing a loan and to decide whether we wish to take out insurance in that respect.

i. For archiving purposes

We do not collect more personal data than is necessary for the purposes set forth above. If we do not store the data for those purposes, we may nonetheless do so for archiving purposes. That means that they will only be used for legal proceedings, or for historic, statistical or scientific purposes.

4. Does Rabobank also process sensitive data?

Sensitive data are special types of personal data, for example, concerning physical or mental health, criminal data or racial or ethnic data.

To be able properly to perform our role as an insurance broker, we may sometimes process data concerning your health. For example, if you wish to take out occupational disability insurance.

Rabobank participates in incident registers and alert systems for the financial sector, and may process data concerning criminal records for that purpose. The purpose of an incident register or alert system is to protect the interests of financial institutions and their clients, e.g. by detecting fraud.

Furthermore, we will process sensitive data only if so required by law, with your consent, or at your request. If you request us to record sensitive data about you, or if you disclose such data yourself, we will only process them if that is necessary for our services.

5. How does Rabobank treat my personal data?

Your personal data are stored carefully and no longer than necessary for the purpose for which they were processed. Within Rabobank, your personal data can be used only by employees who require access to such data for the performance of their duties. Our employees are subject to a confidentiality obligation.

If we wish to use data for a purpose other than that for which they were originally processed, then we may only do so if the two purposes are closely related. For example, if you contract a mortgage loan from us, we may notify the insurance department to see if this will affect your insurance portfolio. There is a close relationship between the purchase of this new product and the maintenance of the insurance portfolio.

Your personal data may also be shared between the various Rabobank divisions, but only if this is reconcilable with the purpose for which the personal data were collected. Data that identify you may, for example, also be used by another

Rabobank division that you wish to do business with.

If we act as a broker, we will have to share personal data. For example with an insurer with which you have taken out an insurance policy through us.

We sometimes engage third parties to edit personal data, e.g. a printer who carries out a client mailing for us and prints name and address details on envelopes. We can engage third parties only if this fits the purpose for which we have processed your personal data, e.g. for promotional and marketing purposes. In addition, such third party may only obtain our order if he has demonstrably taken appropriate security measures and warrants confidentiality.

If we provide you with a loan, we sometimes have to share data with the BKR. For example the amount of the loan we provide or if you do not pay us back in time.

Your personal data may also be shared with third parties that we engage in our operations or the provision of our services. This may, for example in the context of payment transactions, include transfer to third parties in countries that do not have the same level of protection for personal data as the Netherlands. Your personal data may, both during and after processing, be subject to investigation by competent national authorities in the countries where such data are located for purposes of processing.

We may disclose personal data if we are legally obliged to do so. For example to a tax authority or a supervisor.

Your personal data will not be sold or hired out.

6. What rules must the Rabobank observe in the processing of personal data?

When processing personal data in the Netherlands, Rabobank is subject to laws and regulations including:

- The Dutch Personal Data Protection Act [Wet bescherming persoonsgegevens];

- The Code of Conduct for the Processing of Personal Data by Financial Institutions [Gedragcode verwerking persoonsgegevens financiële instellingen];
- The Incident Alert System for Financial Institutions Protocol [Protocol incidenten waarschuwingssysteem financiële instellingen];
- The Dutch Telecommunications Act [Telecommunicatiewet].

The Code of Conduct for the Processing of Personal Data by Financial Institutions and the Incident Alert System for Financial Institutions Protocol have been approved by the Dutch Data Protection Authority [College Bescherming Persoonsgegevens]. Where necessary, the processing of personal data by the various Rabobank divisions has been registered with the Dutch Data Protection Authority.

7. Can I view the personal data that Rabobank processes about me?

Yes, you may request a summary of the personal data processed about you from the Rabobank division that you do business with.

If you feel that your personal data have been processed incorrectly or incompletely, or if you feel that such processing was unnecessary, then you can file a request for editing, supplementation or removal of your personal data with the Rabobank division that you do business with.

8. Who can I turn to if I have a question or a complaint?

If you have any questions or complaints about Rabobank's processing of personal data, please contact the division that you do business with.