



KBC Ancora Privacy statement

This version is applicable on 01/02/2022.

Table of contents

- To start with: changes to this privacy statement 2
- 1. Who is responsible for processing your personal data? 3
- 2. Purposes of the processing: why does KBC Ancora process your personal data and on what basis? 3
 - 2.1. KBC Ancora processes your data in order to be able to comply with legal obligations..... 3
 - 2.2. KBC Ancora processes your data in the context of its shareholder administration and its operations 4
 - 2.3. KBC Ancora processes data for fraud prevention and in order to guarantee security 5
 - 2.4. KBC Ancora processes data for the administration of relationships with suppliers and partners..... 5
- 3. What personal data does KBC Ancora use? 5
 - 3.1. KBC Ancora shareholders and prospective future shareholders 5
 - 3.2. Directors of Almancora Beheersmaatschappij..... 6
 - 3.3. Other contacts (suppliers and partners) 6
 - 3.4. Temporary storage of images from surveillance cameras 6
 - 3.5. Non-targeted visual impressions..... 6
- 4. How long does KBC Ancora keep your data? 7
 - 4.1. Retention period 7
 - 4.2. What does KBC Ancora do with your personal data after the retention period has expired? 7
- 5. Does KBC Ancora share your personal data with third parties? 7
 - 5.1. What KBC Ancora does not do 7
 - 5.2. What KBC Ancora does do..... 7
- 6. Personal data outside of the European Economic Area? 8
- 7. What are your rights?..... 8
 - 7.1. Access to your data 8
 - 7.2. Rectification of your data 8
 - 7.3. Right of objection 8
 - 7.4. Right to withdraw your consent..... 9
 - 7.5. Right to erasure of data..... 9
 - 7.6. Right to restrict data processing operations 9
 - 7.7. Right to data portability 9
 - 7.8. Right to lodge a complaint with a data protection authority 9
- 8. How can you contact KBC Ancora? 10

KBC Ancora Privacy statement

KBC Ancora is a listed monoholding company with as its main asset a participation of approximately 18.6% in KBC Group NV. An investment in KBC Ancora is an indirect investment in KBC Group. As a major shareholder of KBC Group, KBC Ancora, together with Cera, MRBB and the Other Permanent Shareholders, provides strong foundations for the KBC Group.

As a listed company, KBC Ancora holds certain personal data of its shareholders, prospective future shareholders and other data subjects. We consider it important that the provision of our services is personal, straightforward and reliable. KBC Ancora is thus continually looking for ways to improve these services and to tailor them as much as possible to the personal needs of all concerned.

In this privacy statement, KBC Ancora sets out for you how we handle your personal data. In it, you can read about which of your personal data KBC Ancora processes and what influence you can exert on this yourself. In the context of this privacy statement, we are referring to the personal data of our shareholders, our prospective future shareholders and other data subjects. This privacy statement is made up of several chapters.

To start with: changes to this privacy statement

KBC Ancora can change this privacy statement periodically, for example on the occasion of new services, new functions on the websites or to comply with new legal, contractual or administrative obligations. We therefore recommend that you consult this privacy statement regularly.

The most recent version can be found on the [KBC Ancora website](#). KBC Ancora will inform you via its website or other communication channels before any important change in the content.

What has changed compared to the previous versions of the privacy statement?

- A clarification that our privacy notice applies to our shareholders, prospective future shareholders and other data subjects,
- A refinement of the purposes of the processing ([part 2](#)), namely:
 - KBC Ancora uses personal data in the context of its shareholder administration and its operations ([2.2.](#)): such as sending invitations by e-mail, administering attendances in the context of its general meetings ([2.2.b](#)) and for communication purposes and improving services ([2.2.c](#)).
 - KBC Ancora processes personal data for the administration of relations with suppliers and partners ([2.4.](#)),
- Temporary storage of images from surveillance cameras at the registered office ([3.4.](#)),
- An addition to the partners we work with: KBC Ancora uses specialized service providers for a number of processing operations (processors, and other data controllers in the financial sector - [section 5.2.](#)),
- More precise statements about your rights ([part 7 and 8](#)).

1. Who is responsible for processing your personal data?

The data controller responsible for processing your data is KBC Ancora NV, Muntstraat 1, 3000 Leuven, RLP Leuven, registered with the Crossroads Bank for Enterprises under number 0464.965.639 (“KBC Ancora” or “we/us”).

If you have a question about how KBC Ancora handles your personal data, or if you wish to exercise your rights, you can contact us in one of the following ways:

- by e-mail: mailbox@kbcancora.be
- by post: KBC Ancora NV, Muntstraat 1, 3000 Leuven, Attn: the legal department.

More information about your rights and the practical exercise of these rights can be found under [points 7](#) and [8](#) of this privacy statement.

2. Purposes of the processing: why does KBC Ancora process your personal data and on what basis?

A general overview, in which we show the main purposes of the data processing, can be found below. The purpose of the overview is to give you an overall picture at a glance of the reasons why KBC Ancora processes your personal data.

2.1. KBC Ancora processes your data in order to be able to comply with legal obligations

This processing take place on the grounds of the legal obligations to which KBC Ancora is subject:

(i)

Under article 7:29 of the Companies and Associations Code, the personal data of each shareholder must be recorded and administered in the share register, which is kept at the company’s registered office. Any shareholder can, at his or her request, obtain access to the current data in the share register that relate to him or her.

(ii)

Under the applicable legislation or regulations, KBC Ancora can in some cases also be obliged to disclose personal data to the Financial Services and Markets Authority (FSMA), as well as in general to any competent judicial or administrative authority or supervisory body.

(iii)

KBC Ancora cannot be held liable when it must transfer personal data (i) pursuant to any statutory provision, (ii) on the grounds of an explicit order by a competent supervisory body or administrative authority, (iii) in the context of a police, official or judicial investigation, or (iv) because of a judicial decision.

2.2. KBC Ancora processes your data in the context of its shareholder administration and its operations

KBC Ancora processes your personal data for the general operation of KBC Ancora and for all the obligations and services associated with the shareholder relationship.

This concerns (a) the shareholder administration, (b) the general meetings and (c) communication and improvement of the service provision.

In the cases described below, the data processing takes place on the grounds of (i) a legal obligation (e.g. organising the general meeting and maintaining the shareholders' administration) (ii) our legitimate interests in order to be able to improve our service provision towards our shareholders (iii) the contractual obligations that KBC Ancora has towards shareholders (e.g. administering and keeping track of the share participations) or (iv) your consent (e.g. sending our digital newsletter).

a) Shareholder administration

We use your personal data in the context of the shareholder administration, which also includes the possible payment of dividends. The registered shares of KBC Ancora are administered in the share register.

The personal data concerned are the following: identification data, contact details, national registration number, copy of identity card, financial data concerning the shares (e.g. share ownership, income statement, transaction data), underlying documents in connection with share transfer, co-ownership, division of usufruct/bare ownership, share ownership in respect of legal persons-shareholders, partnership, etc.).

b) General meetings

KBC Ancora processes the personal data of its shareholders for the preparation and administration of attendances and voting procedures for shareholder meetings and for sending out notifications (e.g. invitations to general meetings).

Such data shall also be used to manage, update and to make analyses of the shareholders' database regarding the general meetings.

c) Communication and improvement of our services

The purpose of this processing is to maintain and to improve the communication and service provided to our shareholders and prospective future shareholders.

You can register for the digital newsletters of KBC Ancora via the website. We will ask for your contact details (and your date of birth to identify you in our system) so that we can send you the newsletter.

In order to keep our communication and operations as relevant as possible, we can use your personal data for internal strategic and informative purposes, such as: maintaining data and histories of participations in KBC Ancora activities, data from cookies (such as preferences and your clicks on the KBC Ancora website) and conducting shareholder satisfaction surveys (Net Promoter Score survey). The information we obtain from these analyses is used for statistical analyses, in order to evaluate, improve and adapt the processes and applications for new developments such as the optimisation of

the website. KBC Ancora uses your personal data for these purposes, unless you have objected to such use.

For data collected through the use of cookies on our website, we refer you further to the [cookie policy](#) of KBC Ancora.

2.3. KBC Ancora processes data for fraud prevention and in order to guarantee security

In this context, KBC Ancora processes your personal data based on legitimate interest:

- for monitoring purposes, such as the detection and/or appropriate treatment and/or prevention of irregularities and fraudulent actions, even if these acts may have been carried out by its employees or intermediaries;
- in order to guarantee the safety, security and monitoring of persons and goods.

2.4. KBC Ancora processes data for the administration of relationships with suppliers and partners

KBC Ancora processes your data when you are the contact person for a supplier or partner. In that case, it is possible that we have obtained your data indirectly from the supplier or partner.

Data processing takes place based on our legitimate interest in order to comply with our contracts with suppliers and partners.

3. What personal data does KBC Ancora use?

3.1. KBC Ancora shareholders and prospective future shareholders

In order to IDENTIFY you	
Surname and first name, date of birth, place of birth, nationality, address, identity card number, national registration number and e-mail address	
In order to CONTACT you (safely)	
Telephone number, e-mail address, language, etc., as well as more technical data such as identification data of the devices that you use (MAC address, IPs, unique identification data of your device, etc.)	
In order to be able to SERVE you properly	
Your registered KBC Ancora shares	Number of KBC Ancora shares, date of purchase / date of conversion / date of sale of KBC Ancora shares, income statement, underlying documents for share transfers, co-ownership, division of usufruct/bare ownership, share ownership in respect of legal persons-shareholders, partnership, etc.

KBC Ancora can collect the following information from prospective future shareholders: identification and contact details such as surname and first name, date of birth, address, e-mail address and telephone number.

3.2. Directors of Almancora Beheersmaatschappij

Other than the personal data mentioned under 3.1., the following personal data of the directors of Almancora Beheersmaatschappij NV can also be processed: curriculum vitae, photograph, mandates and term of office, attendance at meetings and remunerations paid.

3.3. Other contacts (suppliers and partners)

KBC Ancora processes personal data of the contact persons of its suppliers and partners with which it concludes agreements within the context of its operations.

The personal data that are processed essentially concern the name, date of birth, professional address, telephone number and e-mail address of the contact person.

3.4. Temporary storage of images from surveillance cameras

The registered office of KBC Ancora is in the Cera building in Leuven. Surveillance cameras are installed in the building to monitor the perimeter and semi-public areas. KBC Ancora respects the specific rules applicable to this. There is a clearly visible sticker at the entrance to the Cera building that indicates the presence of cameras. In addition, KBC Ancora always respects the guidelines of the public service IBZ Safety & Prevention (www.besafe.be).

As a rule, KBC Ancora stores recordings from the surveillance cameras in and around the Cera building (marked with a sticker) for a maximum period of one month.

In some cases, this can be longer:

- if the images recorded are useful for proving actions to demonstrate a (possible) crime or nuisance,
- to prove damage or to identify a perpetrator, a troublemaker, a witness or a victim,
- if someone has exercised their right to access, long enough to answer the question.

Do you have any questions about camera images? Then please contact KBC Ancora, facility & logistics management, Muntstraat 1, 3000 Leuven, e-mail: cctvcera@cera.coop.

3.5. Non-targeted visual impressions

During KBC Ancora meetings and activities, images (photos and videos) giving an impression of what is going on can be recorded. Participants may be visible in these impressions, but KBC Ancora makes sure that they are not personally identifiable images. We can use these impressions on our website and in our publications.

4. How long does KBC Ancora keep your data?

4.1. Retention period

KBC Ancora does not retain your data for any longer than is legally permitted and necessary for the purposes for which your data are processed. How long certain data are retained depends on the nature of the data and the purposes for which they are processed.

Thus, the personal data required for the establishment and maintenance of the share register are kept for the entire duration of the company and up to five years after its liquidation, in accordance with Belgian company law.

4.2. What does KBC Ancora do with your personal data after the retention period has expired?

At the end of the retention period, your personal data will be deleted or anonymised. Anonymisation means that your personal data is stripped of all possible identifying characteristics. What remains are statistical data that can no longer be linked to your person in any way. These statistical data are important to KBC Ancora because they allow it to gain insight into the use made of its services and to optimise them for the future.

5. Does KBC Ancora share your personal data with third parties?

5.1. What KBC Ancora does not do

KBC Ancora does not sell your personal data. KBC Ancora also does not make your personal data available to third parties for marketing, sales and other business activities, except in the cases mentioned below.

5.2. What KBC Ancora does do

When KBC Ancora uses the services of a third party to process data on its behalf, it will opt for a processor in the European Economic Area (EEA) if there is such a choice, so that you can be sure that the legislation offers a high level of data protection (also see point 6 below).

For a number of processing operations, KBC Ancora relies on specialized third parties in the financial sector, who are also data controllers:

- KBC Group NV, KBC Bank NV and CBC Banque SA (for financial documents);
- Euroclear (clearing and settlement institution for payments and securities transactions);
- Euronext Corporate Services (support and analysis of shareholder data in the context of shareholder administration - <https://www.euronext.com/en/privacy-policy>);

KBC Ancora can directly or indirectly call on processors, such as:

- Measuremail (for sending newsletters);
- printing and addressing printers including annual reports and invitations to General Meetings, such as Joos Hybrid (www.groupjoos.com);

- ICT service providers such as Microsoft and Delaware;
- companies for archiving and accessing information, for example Doccle;
- translators and translation bureaus;
- consultants.

6. Personal data outside of the European Economic Area?

In principle, KBC Ancora itself does not process your personal data outside the European Economic Area (EEA).

Although KBC Ancora will opt for a processor in the EEA if there is such a choice, it is possible that the service providers working for KBC Ancora (see point 5.2 above) process your personal data outside of the EEA. In this respect, KBC Ancora will aim to achieve an appropriate and sufficient level of protection for your data, in particular by relying on an adequacy decision in accordance with article 45 GDPR for the country to which data is transferred, by concluding standard contractual clauses in accordance with article 46 (2) GDPR and/or by taking other appropriate safeguards in accordance with Chapter V of the GDPR.

7. What are your rights?

You have the following rights regarding the processing of your personal data.

Conditions can be attached to the exercise of certain rights or exceptions can exist for certain rights. For more information on how to exercise your rights, see [point 8](#). “How can you contact KBC Ancora”.

7.1. Access to your data

You have the right to request free inspection of the personal data that KBC Ancora processes about you. This means that you can request to know which of your personal data are registered and for what purposes we use these data.

7.2. Rectification of your data

You have the right to have your personal data corrected if the data are incorrect.

7.3. Right of objection

You can object to the processing of your personal data by KBC Ancora under certain conditions. You can object to the use of your personal data when the processing is based on KBC Ancora’s legitimate interest.

KBC Ancora will comply with the objection request unless there are compelling reasons not to do so, such as data processing in the context of the fight against fraud.

7.4. Right to withdraw your consent

In the event of processing personal data based on your consent, you can withdraw that consent. In the newsletters, you have the option of clicking the “unsubscribe” or “cancel” link to exercise this right.

Withdrawing your consent does not affect the lawfulness of the processing that KBC Ancora has carried out prior to the withdrawal of your consent, or the processing of your personal data that we carried out based on legal grounds other than your consent.

7.5. Right to erasure of data

A member who wishes his or her personal data not to be retained any longer, has the right to request that the data be erased without unreasonable delay. If KBC Ancora no longer has a compelling reason for processing your personal data, KBC Ancora will erase the data.

However, KBC Ancora cannot be obliged to erase personal data if the processing is necessary for compliance with legal obligations.

From the time of the request, KBC Ancora will refrain from any further processing of the personal data to be erased until the time of actual erasure from its systems.

7.6. Right to restrict data processing operations

In certain cases, you can ask us to restrict the processing of your personal data. For example, if you have submitted an objection to the processing of personal data for which KBC Ancora calls upon legitimate interest as the legal basis. In that case, you can exercise your right to restrict the processing of your personal data pending KBC Ancora’s answer or KBC Ancora’s legitimate grounds outweighing yours.

7.7. Right to data portability

In certain cases, you have the right to obtain your personal data, which you have personally provided to KBC Ancora, in a structured, commonly used and machine-readable form and to transfer the data to another data controller.

7.8. Right to lodge a complaint with a data protection authority

You have the right to lodge a complaint with a data protection supervisory authority regarding the processing of your personal data if you believe that the rules of data protection are being breached. More information is available on the website of the competent data protection authority.

You can reach the Data Protection Authority by post at Drukpersstraat 35, 1000 Brussels and by e-mail at the following address: contact@apd-gba.be.

8. How can you contact KBC Ancora?

A member who wishes to exercise one or more of the rights described above can do so in writing at any time in one of the following ways:

- by letter: KBC Ancora NV, Muntstraat 1, 3000 Leuven, Attn: the legal department
- by e-mail: mailbox@kbcancora.be.

Clearly indicate which right(s) you wish to exercise and provide your contact details so that we can respond to your request:

- your name
- your address
- your landline and/or mobile phone number
- your e-mail address

Please also date and sign your request.

KBC Ancora cannot process your request without proof of your identity (for example: a copy of the front of your identity card). After all, KBC Ancora must be able to verify whether it is indeed your own request.

KBC Ancora will examine, assess and carry out your specific request within the time limits set by law. Whether or not you can exercise your rights depends on the processing and the legal basis.

* * * * *