



Cookies Policy

ING Luxembourg S.A.

May 2023

Disclaimer

This is the Cookies Policy of ING Luxembourg (and its subsidiaries) acting as data controller –located 26, Place de la Gare, 2965 Luxembourg – société anonyme - and registered with the Luxembourg RCS under number B.6041. - www.ing.lu – May 2023.

ING Luxembourg is subject to the data protection obligations set out in the EU General Data Protection Regulation 2016/679 (GDPR).

Contents

- Disclaimer.....1**
- 1. Everything you need to know about cookies: What are cookies and similar technologies?...4**
- 2. How can you, as a user, manage ING cookies and similar technologies?5**
- 3. How long do cookies last?6**
- 4. What are the 2 different levels of cookies used by ING?7**

- 4.1. What are Essential cookies?.....7**

- 4.2. What are non-Essential cookies?7**

- 4.3. What if you refuse these non-essential cookies?8**

- 4.4. Who installs and manages cookies?8**
- 5. What is the purpose of some non-essential marketing cookies and similar technologies? ...9**
- 6. Which cookies and similar technologies are used by ING? 10**
- 7. What about your privacy?..... 15**
- 8. Do you have a complaint?..... 16**
- 9. Changes to this Cookies Policy 17**
- 10. Scope of this Cookies Policy..... 18**
- 11. Contact and questions 19**

1. Everything you need to know about cookies: What are cookies and similar technologies?

Cookies allow us to remember your browsing preferences when you visit our websites or apps and to provide you with information that's interesting to you.

Cookies are small text files that we place and read on your computer, tablet or mobile phone when you use ing.lu and our online applications (apps). They contain unique codes that ensure that you as a user are recognized on your next visit to these pages. This enables us to improve our website and apps while still ensuring your privacy.

We use cookies to measure and analyze your online behavior on our pages so we can improve the content of our pages. Cookies also enable us to adapt our pages to your interests and preferences, such as your preferred language. Cookies and similar technologies (pixels and encrypted/'hashed' email addresses) also help us make our website and online advertisements more personal and appealing to you. More detailed information about similar technologies can be found under [What do we mean by similar technologies?](#)

A list of the cookies used by ING is set out in the table at the bottom of this document.

2. How can you, as a user, manage ING cookies and similar technologies?

You can decide which cookies to allow by choosing a different setting.

- 1) ING asks you which cookies and similar technologies you want and requests your consent.

You choose which cookies you want to receive. The only cookies that you cannot refuse are the essential cookies (see section 4: What are the 2 different levels of cookies used by ING?). You can accept/refuse the other levels of cookies by ticking them or not ticking them in the popup window on your very first visit to ing.lu. You save and confirm your choice regarding which cookies you want to receive/refuse by clicking on 'Agree / Disagree'.

- 2) You can also delete cookies or agree/disagree other levels of cookies (non-essential cookies) if you change your mind.

Do you want to change or just see your current cookie preferences? You can consult and adjust your current choice at any time: just go to ing.lu, scroll all the way down and click on 'cookie preferences' on the bottom part of the webpage. You can also delete your cookies by using your browser's internet options. When you revisit ing.lu, we will ask you again about your cookie preference.

How can you change the settings of the most common browsers? You can adapt your personal preferences regarding cookies via the settings of your browser (e.g. Internet Explorer, Firefox or Chrome) and of your device (e.g. tablet, computer or smartphone).

Deleting cookies in Internet Explorer: Go to Tools > Internet options > General tab. Under Browsing history, click "Delete". You may not want to delete everything. In any case, make sure that "Cookies" is ticked when you click "Delete".

Deleting cookies in Firefox: Go to Tools > Options > Privacy tab. Click on "Clear your recent history". Under Details you can choose exactly what to clear. In any case, make sure you tick "Cookies". You can also indicate how old the cookies must be. Here choose "Everything".

Deleting cookies in Chrome: At the top right, go to More > Settings. Scroll down to the bottom and click on "Advanced". Then go to Site settings in Privacy and security. Click Cookies > See all cookies and site data > Remove All. Confirm by clicking "Clear all".

Please note that you must update the settings for every browser and device you use. If you use more than one browser and/or device, you must make a choice for each browser and device separately. Also note that if several people use the same device, it is possible that one person may accept the use of cookies for the device and that this choice may also apply to the other users. This will depend on the settings for your browser and/or device. To configure the use of cookies for each person if there is more than one user, you can also choose to create a separate user profile for each person (e.g. in your Windows profile) in order to prevent someone from accepting cookies that you do not want.

- 3) Can other websites still show me personalized ING advertisements even if I have not consented to ING's non-essential cookies?

Yes, that is still possible. If you have given your consent to other websites or social media platforms for their cookies or similar technologies, they may place ING advertisements which they believe may be relevant to you on the basis of their selection criteria. These cookies are managed entirely by these other websites or social media platforms and are a protected environment as far as ING is concerned. You should therefore manage your consent to cookies and settings on that website or platform. Details of how to do this can often be found on the external website itself. You can also delete cookies or accept other cookies if you change your mind.

3. How long do cookies last?

Temporary cookies are stored in your browser for a limited period (session, one day, etc). On ing.lu, for example, we use temporary cookies. The so called “session cookies” are temporary cookies which are erased automatically when you close your browser. Session cookies are stored on your computer temporarily. They are erased immediately when you log out or interrupt the connection.

Permanent cookies remain in your browser until their expiry date unless you remove them yourself using your browser’s internet options. You can find details of how long each cookie is stored on your browser in the summary table below in the section: Which cookies and similar technologies are used by ING?

4. What are the 2 different levels of cookies used by ING?

ING distinguishes between 2 types of cookies:

- (i) Essential cookies
- (ii) Non-essential cookies

These 2 types of cookies are described in more detail below.

4.1. What are Essential cookies?

Essential cookies cannot be adapted or deactivated because they are vital for making the website function properly and for offering you the best possible user experience. They are essential for ensuring that the website works properly.

With these essential cookies:

- we make sure that your display and other technical settings are correct
- we remember your preferences, such as your language
- your visit is anonymously tracked, which allows us to measure and analyze the use of our pages and thus improve their content. For instance, essential cookies show us which pages on the website are visited the most, help us to record any problems with the website and let us see whether the content of our pages is effective or not. We use this information to analyze the traffic on the website, but we do not examine this information for the purpose of identifying an individual person. These cookies enable us to understand the general pattern of usage of the website.

Who installs and manages essential cookies?

ING installs the essential cookies on your computer and manages them as well. For this reason, cookies of this type are also called “first-party cookies”. In the case of first-party cookies, ING is the 'data controller'. The data controller (DC) is the company that determines for what purposes and how personal data is processed.

Some essential cookies are generated in collaboration with a partner (such as companies that provide technology to analyze (web)pages); these are then called “third-party cookies”. The data are managed by the external party, but none of the data can be used by anyone but ING. These external parties are also referred to as 'data processors' of ING. At the request of ING (data controller or DC), they will process the personal data as data processors (DP).

4.2. What are non-Essential cookies?

Non-essential cookies are not strictly necessary to the supply service that we provide you as a bank.

We use these cookies in order to:

- improve the content and user experience of our website
- link you securely, as an identified ING customer (e.g. after logging into My ING App), to your personal data in our database. To make our website relevant to you, we can also add a limited set of data from our database to your cookies (such as type of customer, age group, gender, products or services that you already have, etc.)

Of course, we only use these non-essential cookies if you have given us your consent to do so. If you have consented to the use of cookies, we may use them to adapt our pages with more relevant information for you.

4.3. What if you refuse these non-essential cookies?

You will still see advertisements from ING. But these advertisements will not take your browsing behavior and/or other customer data into account.

4.4. Who installs and manages cookies?

ING installs the majority of cookies on your computer and manages them as well. For this reason, cookies of this type are also called “first-party cookies”.

In the case of first-party cookies, ING is the 'data controller'. The data controller (DC) is the company that determines for what purposes and how personal data is processed.

Some cookies are generated in collaboration with a partner (such as companies that provide technology to analyze websites). These are called “third-party cookies”. The data is then managed by the external party but can only be used by ING. These external parties are also referred to as 'data processors' of ING. At the request of ING (data controller or DC), they will process the personal data as data processors (DP).

5. What is the purpose of some non-essential marketing cookies and similar technologies?

Non-essential cookies and similar technologies **can sometimes be used for marketing cookies'**.

Similar technologies refer for instance to pixels and encrypted email addresses (or 'hashed e-mails') and are intended for placing advertisements **on your social media and other third-party websites**. These marketing cookies take account of your personal browsing behavior on our own website, other customer data from our database and/or your personal browsing behavior away from our website (such as your social media or other websites).

As previously described, the use of marketing cookies may be supplemented with similar technologies, such as pixels and encrypted e-mail addresses (see: What do we mean by similar technologies?).

Of course, we only use these marketing cookies if you have given us your consent to do so. If you have consented to the use of marketing cookies and similar technologies, ING may use them to send certain data to an external party (such as an advertising agency) if ING wants to launch a campaign on a third-party website.

What if you refuse these marketing cookies? Then you will still see advertisements from ING. But these advertisements will not take account of your browsing behavior and/or other customer data.

6. Which cookies and similar technologies are used by ING?

Below is a list of all the cookies and similar technologies that we use in **ing.lu** (and our online applications (apps), such as My ING...), in each case with further details of their purpose, validity period, type and the administrator of these cookies. This list is evolving and therefore subject to change.

Administrator	Data controller (DC) / Processor for ING (DP)	Category	Name	Purpose	Validity corresponds to a cookie if technology not mentioned
DIDOMI	DP	essential	didomi_token	This cookie contains consent information for custom purposes and vendors, as well as Didomi-specific information (user ID, for instance).	- 6 months for cookie - permanent for local storage
DIDOMI	DP	essential	euconsent-v2	This cookie contains the Interactive Advertising Bureau (IAB)'s Transparency and Consent Framework (TCF) consent string and consent information for all the standard IAB vendors and purposes.	6 month
ING	DC	essential	AMWEBJCT	Our server creates unique cookie names to prevent possible naming conflicts with cookies returned across other junctions. It adds the name of the specific junction responsible for delivering the response (with cookie) with an unique session identifier.	session
ING	DC	essential	cq-opt-out	Used for displaying the cookie management platform before the user to give or refuse his global consent to the use of cookies.	permanent
ING	DC	essential	ING_LANGUAGE	Used for storing your language preference on our website.	session

ING	DC		ing-cookies-opt-in	Stores the consent or refusal to the use of cookies.	1 year
ING	DC	essential	isim-profile-cookie	Stores the profile and country of residence of the visitor based on his answers in order to give the access to the consultation of investment products. This is a regulatory obligation.	1 day
ING	DC	essential	IV_JCT	Contains the appropriate junction information for server-relative links on the visitors side.	session
ING	DC	essential	JSESSIONID: Cookie de session	Preserves users states across page requests.	session
ING	DC	essential	omniture_optout	These cookie stores information on whether it is permissible to analyze the visitor's user behavior using Adobe Analytics.	session
ING	DC	essential	PD_STATEFUL...	Session index cookie used by our security system to the specific session of the visitor.	session
ING	DC	essential	PD-S-SESSION-ID	Indexes a session in the Reverse Proxy session cache (or DSC if that is being used).	session
ING	DC	essential	TS01287a41	This is a security cookie. TS cookies are F5 server cookies installed by the ASM.	session
YouTube	DP	non-essential	_gid	Cookies beginning with __utm and _ga originate from Google Analytics and are used to keep a record of visitor statistics.	13 month
YouTube	DP	non-essential	HSID	Enable Google to collect user information (tracking of google account owner through internet pages)for videos hosted by YouTube. In Google's case, the two cookies uniquely identify a particular "session" or "sign in" (Google account used	13 month

and sign in time) and are stored only on the computer that you performed that sign-in from. So you can access multiple pages and Google knows it is you, but since nobody else possesses those precise cookies, they can't impersonate you.

YouTube	DP	non-essential	SSID	Enable Google to collect user information for videos hosted by YouTube.	13 month
YouTube	DP	non-essential	__Secure-1PSID ..., __Secure-3PSIDCC ...	Used by for targeting purposes to build a profile of the website visitor's interests in order to show relevant & personalized Google advertising.	13 month
YouTube	DP	non-essential	__Secure-YEC	Stores the user's video player preferences using embedded YouTube video	13 month
YouTube	DP	essential	CONSENT	Used to detect if the visitor has accepted the marketing category in the cookie banner. This cookie is necessary for GDPR-compliance of the web site.	2 years
YouTube	DP	non-essential	SAPISID	enable Google to collect user information for videos hosted by YouTube.	13 month
YouTube	DP	essential	SIDCC	to provide the identification of trusted web traffic.	1 Y
YouTube	DP	essential	VISITOR_INFO1_LIVE	This cookie is set by Youtube to keep track of user preferences for Youtube videos embedded in sites; it can also determine whether the website visitor is using the new or old version of the Youtube interface.	session
YouTube	DP	non-essential	YSC	Registers a unique ID to keep statistics of what videos from YouTube the user has seen .	session
YouTube	DP	non-essential	yt.innertube::nextId	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	permanent

YouTube	DP	non-essential	yt.innertube::requests	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	permanent
YouTube	DP	non-essential	ytidb::LAST_RESULT_ENTRY_KEY	Stores the user's video player preferences using embedded YouTube video	permanent
YouTube	DP	non-essential	yt-remote-cast-available	Stores the user's video player preferences using embedded YouTube video	session
YouTube	DP	non-essential	yt-remote-cast-installed	Stores the user's video player preferences using embedded YouTube video	session
YouTube	DP	non-essential	yt-remote-connected-devices	Stores the user's video player preferences using embedded YouTube video	permanent
YouTube	DP	non-essential	yt-remote-device-id	Stores the user's video player preferences using embedded YouTube video	permanent
YouTube	DP	non-essential	yt-remote-fast-check-period	Stores the user's video player preferences using embedded YouTube video	session
YouTube	DP	non-essential	yt-remote-session-app	Stores the user's video player preferences using embedded YouTube video	session
YouTube	DP	non-essential	yt-remote-session-name	Stores the user's video player preferences using embedded YouTube video	session
FundInfo.com	DP	essential	ai_session	This cookie name is associated with the Microsoft Application Insights software, which collects statistical usage and telemetry information for apps built on the Azure cloud platform. This is a unique anonymous session identifier cookie. The main purpose of this cookie is performance measurement for the functioning of the website.	session

FundInfo.com	DP	essential	ai_user	This cookie name is associated with the Microsoft Application Insights software, which collects statistical usage and telemetry information for apps built on the Azure cloud platform. This is a unique user identifier cookie enabling counting of the number of users accessing the application over time. The main purpose of this cookie is performance measurement for the functioning of the website.	1year
FundInfo.com	DP	essential	ai_session	This cookie name is associated with the Microsoft Application Insights software, which collects statistical usage and telemetry information for apps built on the Azure cloud platform. This is a unique anonymous session identifier cookie. The main purpose of this cookie is: Performance	session

7. What about your privacy?

In accordance with the amended law of 30 May 2005 regarding the protection of personal data in the field of telecommunications and electronic communications and the Regulation (EU) 2016/679 on the protection of natural person with regard to the processing of personal data and the free movement of such data, you are entitled to request a copy of the personal data ING Luxembourg has compiled about you, including those collected by cookies.

Subject to legal and regulatory provisions, data of a personal nature that might be collected is not destined to be communicated to third parties other than those named by you.

8. Do you have a complaint?

You have a right of access, opposition, rectification, and deletion with regards to information concerning you in accordance with the legislation on the processing of personal data in effect in Luxembourg.

You can find more information on [ing.lu](https://www.ing.lu) or contact us via My ING App, mentioning that your request relates to “privacy”:

- Contact your local ING branch, your account manager, your personal or private banker
- Call us on +352 44 99 1
- Send a secured message via the My ING App.

If you do not agree or if you have a complaint with regard to the processing of your personal data, you can send your request with the reference “privacy” by:

- Post: ING Luxembourg, Complaints, 26, Place de la Gare, L-2965 Luxembourg, or
- E-mail: dpo@ing.lu

If you contact us, we are obliged to identify you correctly. We may therefore ask you to visit an ING branch in order to be properly identified. We may also ask you to present a valid identity card or passport.

All personal data are processed in accordance with the applicable Privacy Statement available on the website of the Bank: www.ing.lu.

9. Changes to this Cookies Policy

We may amend this Privacy Statement to remain compliant with any changes in law and/or to reflect how our business processes personal data. This version was created in May 2023 and enters into force on 22/May/2023. The most recent version is available at www.ing.lu.

10. Scope of this Cookies Policy

This is the Cookies Policy of ING Luxembourg S.A. and its subsidiaries:

- ING Luxembourg, Société Anonyme, with registered office at 26, Place de la Gare, L-1616 Luxembourg (B.P. L-2965 Luxembourg), R.C.S. number B 6041;
- ING LEASE Luxembourg, Société Anonyme, with registered office at 26, Place de la Gare, L-1616 Luxembourg (B.P. L-2965 Luxembourg), R.C.S. number B 31049;
- ING Solutions Investment Management S.A. (ISIM), Société Anonyme, with registered office at 26, Place de la Gare, L-1616 Luxembourg (B.P. L-2965 Luxembourg), R.C.S. number B 162705

It applies also to all entities and branches of ING Luxembourg S.A. to the extent that they process personal data.

11. Contact and questions

To learn more about ING's rules regarding privacy and how we use your personal data, you can primarily contact us through our usual channels by:

- Connecting to your My ING and send us a message with a reference "Data Protection"
- Visiting your local branch, contacting your relationship manager, your personal or private banker

If you are a Client of ING Luxembourg S.A.: contact ING via dpo@ing.lu referring to "Data Protection".

If you are a Client of ING Lease Luxembourg S.A.: contact ING Lease via contact@lease.ing.lu referring to "Data Protection".

If you are a Client of ING Solutions Investment Management S.A. (ISIM): contact ISIM via data.protection@ing-isim.lu referring to "Data Protection".

In case of disagreement or complaints related to the processing of your personal data, you can send us a request with "Data Protection" as reference via:

- Mail: Complaints Service, 26, Place de la Gare, L-2965 Luxembourg
- E-mail: complaints@ing.lu

If you did not obtain a satisfactory resolution of your case, you can submit a written request to the Data Protection Officer of ING via:

- E-mail: dpo@ing.lu
- Mail: Data Protection Office, 26, Place de la Gare, L-2965 Luxembourg.

You may also lodge your complaint with the Local Data Protection Authority:

La Commission Nationale pour la Protection des Données (CNPD), L-4370 Belvaux, 15, Boulevard du Jazz, (<http://cnpd.public.lu>) as well as to the judicial authorities.