

"SUMMARY TABLE - Shared infrastructure of third parties and/or the ING Group¹" concerning ING LEASE Luxembourg S.A. (see Article 15 Outsourcing of the "General Conditions of Leasing" of ING Lease Luxembourg S.A.)²

This table is applicable from 15/05/2024 to ING Lease Luxembourg S.A. clients. However, for Clients who have established and maintained a relationship with ING Lease Luxembourg prior to this date, this table will only come into force on 15/07/2024.

	Description of the service	Type of shared data	Access to the data
Know Your Customer (KYC) services	<p>CUSTOMER DUE DILIGENCE (CDD) PERFORMANCE AND REVIEW</p> <p>In the frame of transactions monitoring and fight against money laundering and terrorism financing, perform in a centralised manner the necessary steps to collect, control and check as required by applicable national and international legislation regarding, in particular, the identification of the Clients, their proxyholders or legal representatives and beneficial owners or any other documentation linked to the same or the Client's transactions with ING Lease Luxembourg, both upon the entering into the relationship and throughout its lifetime.. This centralised management will also enable ING Lease Luxembourg to classify its Clients on the basis of their specific situation as regards various applicable laws and regulations such as on anti-money laundering and the financing of terrorism, FATCA regulation, CRS regulation, MAR (market abuse regulation) etc.</p>	<p>The data transferred relate to all the identifying data of the Client, the Client reference and, where applicable, their proxyholders or (legal) representatives and beneficial owners including inter alia their identifying data, profession, date and place of birth, passport number, national and/or tax identification number, address, place of residence, telephone number, any public data about the same persons and in general all the data communicated when entering into the relationship or subsequently in terms of customer knowledge and source of funds and all information communicated to ING Lease Luxembourg at the time of each transaction.</p>	<p>In this context, some information may be made available on a confidential basis to ING Luxembourg and ING Bank NV (Netherlands) and/or to its subsidiaries, branches, and/or subcontractors in the Netherlands, Poland, Slovakia, and the Philippines.</p> <p>If the Client is also client in another ING entity, the data may be shared with any other ING entity in the world.</p> <p>This information may be stored on the IPC (ING Private Cloud) infrastructure, managed by ING Bank NV, whose servers are located in the European Union, in the Netherlands.</p>
	<p>COLLECT OF DATA</p> <p>Obtaining data from public and private sources in a centralized manner by ING Group.</p>	<p>The data transferred are amongst others: name of the entity, unique identifier (LEI), country of incorporation, address, which are used to collect data from public and paying sources via an automated system to facilitate KYC on the said entity.</p>	<p>In this context, ING Luxembourg uses the BlackSwan Technologies platform located in Israel and United Kingdom. Some information may be made available in a confidential manner to ING Luxembourg, to ING Bank NV (Netherlands) and/or to its subsidiaries, branches and/or</p>

¹ The subcontractors thus appointed by ING Lease Luxembourg are regulated entities which are either subject by law to an obligation of professional secrecy or contractually bound by ING Lease Luxembourg to comply with strict confidentiality rules.
² If the Client is also a Client of the bank ING Luxembourg, the summary table concerning the shared infrastructure of third parties and/or the ING Group appended to the applicable general terms and conditions of ING Luxembourg is also applicable.
 This table is available at www.ing.lu

		The following personal data of the legal representatives and beneficial owners are also collected: first name, last name, date of birth, country of residence and if available, nationality, residence address, ID card or passport number.	subcontractors in the Netherlands, in the Philippines and in Slovakia. If the Client is also client in another ING entity, the data may be shared with any other ING entity in the world. The results will be stored on a cloud platform* managed by Amazon Web Services (AWS), whose servers are located in the European Union in Ireland.
	<p>NAME SCREENING</p> <p>To perform in a centralised manner within ING Group, the necessary name screening relating to identity of the Clients, their proxyholders or (legal) representatives and beneficial owners as per applicable standard and/or national and international legislation regarding, in particular, identification of Clients, their (legal) representatives and beneficial owners and anti-money laundering and counter-terrorist financing, both upon opening accounts and throughout the lifetime of these accounts.</p> <p>Moreover, screening of the same persons in the media is also centralised within the ING Group</p>	<p>In addition to what is mentioned above in the "CDD Performance and Review" the data transferred to perform the screening are the first name, last name, date of birth and country of residence.</p> <p>To perform the media screening by "Regulatory Data Corp Ltd" (or any other entity of the same group) the data transferred are the first name, last name, date of birth and country of residence.</p>	<p>In this context, some information may be made available in a confidential manner to ING Luxembourg, to ING Bank NV (Netherlands) and/or to its subsidiaries, branches and/or subcontractors in the Netherlands, Romania, the Philippines and Slovakia. This information may be stored on the IPC cloud infrastructure, managed by ING Bank NV, whose servers are located in the European Union, in the Netherlands.</p> <p>Some data relating to the person's subject to the media screening may be made available to the service provider based in the United Kingdom. In this context, the name screening and its results are recorded in a database stored on a cloud platform* managed by Amazon Web Services (AWS), whose servers are located in the European Union in Germany and Ireland.</p>
My Compliance service	The purpose of service is to allow ING Lease Luxembourg to identify (potential) issues (e.g. conflicts of interests, insider trading) and assess, propose and take measures to ensure compliance with the Bank's policies against market abuse and conflicts of interest.	Name and contact details of Client which are legal entities.	In this context, some information may be made available in a confidential manner to ING Luxembourg, to ING Bank NV (Netherlands) and to its subsidiaries, including in Romania. In this context, some information may be stored on the IPC cloud infrastructure, managed by ING Bank NV, whose servers are located in the European Union, in the Netherlands.
Technical service	First level IT assistance to ING Lease Luxembourg employees.	Under this contract the service provider may have access, occasionally and within the framework of the IT assistance, to any data hosted on ING Lease Luxembourg's IT infrastructure.	In this context, some limited information may be made available on a confidential manner to a Financial Sector Professional (FSP) located in Luxembourg.

<p>Technical infrastructure services</p>	<p>Provision and management of infrastructure hosting ING Lease Luxembourg's applications to a Financial Sector Professional (FSP) and its subcontractors as well as a workstation infrastructure managed by ING Luxembourg and/or ING Bank NV (Netherlands) allowing a secure working environment including emails, the directory of operating services, the management of computers and mobile phones, file servers and centralised second-line helpdesk.</p> <p>Making available, via a cloud computing infrastructure managed by ING Bank NV of items and applications enabling a data store to be managed.</p> <p>Performing operational IT or maintenance tasks, including IT system relying on cloud computing.</p>	<p>The data transferred concern the emails, the directory of operating services and the management of mobile phones belonging to ING Lease Luxembourg staff.</p> <p>The Client's data that may be transferred include: the Client reference, name, email address, phone number, company name, email content and attachments.</p> <p>The data transferred to the private cloud computing infrastructure are the same as those mentioned in the KYC and credit risk management services.</p>	<p>In this context, some information may be made available in a confidential manner to a Financial Sector Professional (FSP) located in Luxembourg (including its subcontractors) and whose data centers are located in the European Union in Belgium and in Luxembourg as well as to ING Luxembourg, ING Bank NV (the Netherlands) and/or their partners in Poland, Portugal, and Ireland.</p> <p>The infrastructure platform and data are hosted on a Microsoft Azure cloud platform* with servers located in the European Union, Austria, Finland, Ireland and the Netherlands.</p> <p>In this context, some information may be stored on the IPC cloud infrastructure, managed by ING Bank NV, whose servers are located in the European Union, in the Netherlands.</p>
<p>IT security</p>	<p>Provisions of maintenance and support services relating ING Lease Luxembourg's applications hosted in the infrastructure.</p> <p>Management of IT security system particularly the detection and management of security incidents.</p>	<p>The data transferred concern the email service, active directory service and mobile application management of ING Lease Luxembourg staff. The data transferred may thus potentially contain all types of (personal) data and information, documents and contracts collected and/or processed by ING Lease Luxembourg with its Clients in the course of its activities (e.g. Client reference, name, email address, phone number, company name, email content and attachments).</p> <p>For the management of IT security system, the concerned data also includes the technical data contained in the system logs and flows (containing users' IP addresses) as well as the data contained in ingoing and outgoing internet flows.</p>	<p>In this context, some information may be made available in a confidential manner to a Financial Sector Professional (FSP) based in Luxembourg (including its subcontractors) and whose data centers are located in the European Union in Luxembourg, and to ING Luxembourg, as well as ING Bank NV (Netherlands) and/or to its subcontractors in Poland.</p>
<p>Services related to the printing and management of Client documents</p>	<p>Layout, printing and digitisation of Client documents service.</p>	<p>The data transferred concern all the Client data contained in the Client documents and in the leasing agreements, including inter alia the Client reference, last name and first name, address, data related to the lease</p>	<p>In this context, certain information may be made available on a confidential basis to ING Luxembourg, to a Financial Sector Professional (FSP) located in Luxembourg as part of the switch to paperless documents and printing, as well as to ING Belgium for</p>

		contracts, products and services subscribed.	the layout of different types of Client documents.
Physical archives management	Storage of archives, collection of archives for secure transport to the storage warehouse, return of archives for consultation purposes and destruction of the archives with provision of a certificate of destruction.	The Client's data transferred include : all Clients data including without limitation the Client reference, name, first name, email address, correspondence, phone number, company name, and any other data and documents processed during the Client's relationship with ING and contained in the physical archives. Data used for the tracking of the archives (for consultation purposes) and for their destruction.	In this context, some information may be made available in a confidential manner to ING Luxembourg and to a Financial Sector Professional (FSP) based in Luxembourg and with a warehouse located in Luxembourg. The FSP only handles the container and not the content.
Credit risk management service	Centralised orchestration and storage of financing applications and decisions (whether during leasing or financing application or during its lifetime), determination of credit limits and credit exposures per Client. Monitoring and modelling of credit and market risks, internal and external credit risk reporting under different market conditions (scenarios).	The data transferred concern all the Client's data relating to a financing or lease application, a modification or any other event related to the financing/lease life cycle as well as any supporting documentation. This information includes amongst others: the Client reference, contract number, repayment schedules, type and characteristics of the products subscribed to, remuneration conditions, guarantees, securities, names of any guarantors, assets, defaults and any other financial information held by ING Lease Luxembourg in relation to the Client. For legal entities only, the data transferred also include the Client's financial data, including balance sheet, revenue and number of employees. In addition, for Legal entities only, the data transferred also include the beneficial owners and legal representatives' personal data, including its identity, address, ownership structure, sector of activity, town and country of incorporation. For individuals, the data transferred also include the Client's personal data, including its identify, profession, marital status, matrimonial agreement and number of dependent children.	In this context, some information may be made available in a confidential manner to Nexvia (a service provider based in Luxembourg), to ING Luxembourg, and to ING Bank NV in the Netherlands, and its subcontractors in the Netherlands in Belgium, Poland, Slovakia and/or ING Bank NV's subsidiaries and branches worldwide. The central platform and the data are hosted and stored on the IPC cloud infrastructure managed by ING Bank NV, whose servers are located in the European Union, in the Netherlands. The infrastructure platform and the data transmitted to Nexvia in Luxembourg are hosted and stored on an Amazon Web Services cloud platform* whose servers are located in the European Union in Ireland.
Market risk management services	Monitoring and modelling of market risks in general, internal reporting and export of interest rate and liquidity risks from ING Lease Luxembourg.	The data transferred is mainly financial data, including Client reference, contract number, repayment schedules, typology and characteristics of the products or financing subscribed, etc.	In this context, certain information may be made available on a confidential basis to ING Luxembourg, ING Bank NV in the Netherlands or to its subsidiaries in Belgium, in Poland or in the Philippines.
Digital Communication Channels	Provision of secure digital communication channels (video conference, audio call, chat and messaging). These channels use services in the Internet Cloud. ¹	The data transferred concern the information necessary to establish communication and vocal recognition: <ul style="list-style-type: none"> • IP address • Telephone number • Email address • Photo or video 	In this context, certain information may be made available on a confidential basis to ING Luxembourg, ING Bank NV and/or their subcontractors in the Netherlands, Belgium or Poland.

		<ul style="list-style-type: none"> Natural Language Automated Processing (NLP, Voice recognition) <p>Communications are recorded and stored by ING Luxembourg, acting on behalf of ING Lease Luxembourg and may be used as evidence in accordance with the applicable General Terms and Conditions.</p> <p>The Cloud service operator has access to technical data only depending on the channel (and not to the decrypted content of communications):</p> <ul style="list-style-type: none"> IP address The encrypted content of the message (for which only ING has the decryption keys) during the communication period; before being deleted at the end of the call. 	<p>The infrastructure platform and the data are hosted on Amazon Web Services (AWS) and Google cloud platforms*, both located in the European Union, in Ireland and Germany.</p>
<p>Client relations management services</p>	<p>To record, view and share information provided by the Client or any other information in connection with the Client on centralised platforms with ING Bank NV (Netherlands) and its subsidiaries worldwide, in order to improve Client service.</p>	<p>The data transferred include, but are not limited to:</p> <ul style="list-style-type: none"> The Client's data, in particular its identity, address, owner structure, city and country of incorporation. Data of the Client's contact persons including name, address, position, date of birth and contact data, namely telephone number, email address, LinkedIn profile or other. Data on interactions with the Client such as meeting minutes, participation in campaigns or events. Product characteristics and financial data such as credit or market risk limits, unpaid balances, account numbers or contracts entered into. 	<p>In this context, certain information may be made available on a confidential basis to ING Luxembourg, ING Bank NV (Netherlands) and/or its subsidiaries or branches worldwide.</p> <p>ING uses the SFDC Ireland Ltd (Salesforce) platform hosted in an Amazon Web Services (AWS) cloud* platform whose data remains in the European Union, especially in France, Ireland and Germany.</p>
<p>Marketing event management service</p>	<p>Use of an external platform to collect electronic registrations of guests, Clients and prospects at marketing events organised by ING Lease Luxembourg or ING Luxembourg.</p>	<p>The data transmitted concern the following identification data (encoded directly) by the person registering for such a marketing event online in response to his/her invitation:</p> <ul style="list-style-type: none"> Surname First name Name of company for legal entities Email address Telephone number (optional) 	<p>In this context, certain information may be made available on a confidential basis to ING Luxembourg, ING Bank NV in the Netherlands or its subsidiary in Belgium and its partner Via Futura Bvba established in Belgium.</p> <p>The data will be stored in a database hosted on an Amazon Web Services (AWS) cloud platform* whose servers are located in the European Union, Belgium and the Netherlands and the United States regarding the email address.</p>

<p>Signature sharing platform service</p>	<p>Use of a platform to collect electronic signatures related to legal documentation between ING Lease Luxembourg and its Clients.</p>	<p>The data transferred include the documents to be signed, the first name and surname of each signatory, his/her position, his/her link with the legal entity for which he/she is acting, his/her telephone number (to be able to send text messages) and his/her email address.</p>	<p>In this context, certain information may be made available on a confidential basis to a cloud infrastructure provider* provided by Adobe and hosted by Amazon Web Services (AWS) whose servers are located in the European Union, in Ireland and Germany.</p>
<p>Automated translation system</p>	<p>Translation tool using artificial intelligence.</p>	<p>All types of texts and documents, including those collected by ING Lease Luxembourg or communicated by the Client in the course of the business relationship, such as manuals, contracts, procedures, reports, product and support information, websites, etc.</p>	<p>In this context, certain information may be stored on the IPC cloud infrastructure, managed by ING Bank NV, whose servers are located in the European Union in the Netherlands.</p>
<p>Infrastructure of ING Lease Luxembourg employees' emails and archiving</p>	<p>Provision of the exchange Online O365 messaging infrastructure for the ING Lease Luxembourg entity managed by ING Bank NV (Netherlands). This infrastructure has an archive managed by ING Bank NV (Netherlands), of all emails sent to and from ING mailboxes.</p> <p>Exchange O365 is a cloud computing infrastructure managed by ING Bank NV (Netherlands).</p>	<p>The data transferred concerns all data related to the processing of all emails sent to and from ING mailboxes (to employees or not) (internal and external) as well as their attachments. This also includes the employee calendar, contacts, and all email-related features.</p>	<p>In this context, certain information may be made in a confidential manner accessible to ING Luxembourg, to ING Bank NV in the Netherlands on a Microsoft Azure cloud platform* whose servers are located in the European Union in the Netherlands, Poland and Ireland.</p> <p>Certain information may also be stored on the IPC cloud infrastructure, managed by ING Bank NV, whose servers are located in the European Union in the Netherlands.</p> <p>Archiving of these emails will also be accessible confidentially by ING Bank NV (Netherlands).</p>
<p>SharePoint data storage infrastructure</p>	<p>Provision of a Microsoft SharePoint type data sharing infrastructure for ING Lease Luxembourg managed by ING Bank NV and ING Luxembourg. SharePoint is a cloud computing infrastructure managed by ING Bank NV (Netherlands).</p>	<p>The data transferred may potentially contain all types of (personal) data and information, documents and contracts collected and/or processed by ING Lease Luxembourg with its Clients in the course of its activities.</p>	<p>In this context, certain information may be made in a confidential manner accessible to ING Luxembourg, to ING Bank NV in the Netherlands or to its subsidiaries and branches worldwide and is stored on Microsoft Azure cloud platform* whose servers are located in the European Union in the Netherlands, Poland and Ireland.</p>
<p>Financing administrative management service</p>	<p>Operational processes related to ING Leasing's front office and back-office activities such as entering Client financing data for tools related to financial analysis, checking the authority of signatories of credit documentation and other related contractual documents, creating risk rating proposals, monitoring the commitments of Clients and guarantors and periodically reviewing financing operations.</p>	<p>The data submitted shall include all information relating to applications for financing and contracts entered into in this context, the assets financed or the guarantors and guarantees granted and all supporting documentation.</p> <p>This information includes, in particular, the identity of the Client (or guarantors), the purpose to be financed, the ownership structure of the Client, the identity of the investors, information concerning KYC reasonable efforts, the data of the signatories, the financial data of the Client (or the guarantors)</p>	<p>In this context, certain information may be made available on a confidential basis to ING Luxembourg, ING Bank NV in the Netherlands, and/or its subsidiaries or branches worldwide, including in particular Belgium, Poland, Romania, Slovakia, the Philippines and Sri Lanka.</p> <p>Certain data may also be accessed by Acuity Knowledge Partners in Sri Lanka as a subcontractor of ING NV Bank's branch in Sri Lanka.</p>

		(balance sheet, turnover, number of employees, performance) and any other financial information kept by ING Lease Luxembourg in relation to the Client (or guarantors) (credit-debit balance sheet, existing credit facilities or other financing granted by ING Lease Luxembourg or other ING entities and their outstanding amounts).	
Control activities	Control of ING Lease Luxembourg's activities, compliance with ING's internal procedures and production of Audit reports to meet regulatory requirements.	The data which may be transferred concern all the customer Client's and guarantors' data included in a contract or financing or any other event related to the life cycle of the product as well as any supporting documents, including, but not limited to, surname and first name, address, email address and contract number.	Certain data may thus be made available to ING Luxembourg or ING Bank NV (Netherlands) or ING Belgium (Belgium).
Dispute management and debt collection services	Assistance and management of any type of litigation or dispute in the context of lease agreements or default on payment, including claims, debt collection or any other right or financial benefits in favour of ING Lease Luxembourg.	The data transferred concerns all the data of the Client and guarantors in the context of a contract or guarantors' financing included in a contract or financing or any other event related to the life cycle of the subscribed product as well as any supporting documents.	In this context, certain information may be made available on a confidential basis to ING Luxembourg S.A. Bank NV in the Netherlands or its subsidiaries in Poland and/or to their partner(s) Thales (or its subsidiaries) in Luxembourg or in the country of residence of the lessee to recover debts and/or leased equipment and/or to manage the dispute in France and/or in Germany.
Consolidated regulatory reporting of the Bank	Consolidation of COREP (Common Reporting Framework) and EBA (European Banking Authority) regulatory reports.	The data transferred includes in particular the Client reference, Client name, their LEI, national identification number only for companies accounting for the 20 biggest credit risk exposures of ING Lease Luxembourg.	In this context, some information may be made available in a confidential manner to ING Luxembourg, to ING Bank NV (Netherlands) and to its subcontractors in the Netherlands including PwC. In this context, some information may be made available in a confidential manner to a supplier of a cloud* infrastructure provided by Solvinity (Netherlands) and hosted by Solvinity. The data will remain in the European Union, in Solvinity's databases in the Netherlands.

ⁱ However, in view of applicable US laws and the cloud platform provider's links to the United States, it cannot be excluded that certain data may exceptionally be accessed by the US authorities.