

## BCC Corporate Online Privacy Statement

At BCC Corporate, we are committed to safeguarding and preserving your privacy when you are visiting our site ([www.bcc-corporate.be](http://www.bcc-corporate.be)) and all underlying pages) and/or communicating with us. We want you to know how we may collect, use, share, and keep information about you as a customer (or prospective customer) and the choices that are available to you. We endeavor to process your Personal Data in a lawful, fair and transparent fashion.

When we provide products or services to you, we may also give you specific additional details about how we will use your personal information.

This online privacy statement applies to BCC Corporate Sites, online related applications that run on smart phones, tablets, and other mobile devices ("apps") as well as your use of, or access to any of our online services or content and other online programs that we offer with our partners that link to this statement. It does not apply to those websites of which Personal Data is being governed by the sites own online privacy statements.

In this statement, we describe how BCC Corporate and our Business Partners and Service Providers offer or participate in any service or benefit provided in relation to our products or services (together we, us, our or BCC Corporate). We explain how we collect, use, disclose, and safeguard Personal Information and Other Information. This statement includes descriptions and examples to help you understand the nature of the online information that we collect, use, disclose and safeguard.

Personal Data is any information on an identified or identifiable natural person (referred to as the "data subject" in the Belgian Privacy Act of 8 December 1992 on data protection). It may involve a person's name, a photograph, a telephone number (including a work number), a PIN, a password, a bank account number, a link with a company or other persons, an e-mail address, etc.

Data processing refers to any single processing operation or entire processing procedure for Personal Data. The processing procedure is very wide-ranging, and includes collecting, saving, using, amending, and divulging data.

More information on data protection legislation in Belgium is available on the website of the Belgian Privacy Commission: [www.privacycommission.be](http://www.privacycommission.be).

### Notification

In order to have proper authorisation to collect Personal Data, prior notification at the Belgian Privacy Commission has been submitted. This concerns both Personal Data collected from our site in Luxembourg as the site in Belgium.

### Data Controller – Data Processor

Pursuant to the Belgian Act of 8 December 1992 on data protection (commonly known as the 'Privacy Act'), BCC Corporate is responsible for the processing ('controller') of the Personal Data of, inter alia, existing or potential customers. This implies that BCC Corporate is responsible for compliance with the legal requirements regarding the processing of your data for the purposes determined by BCC Corporate itself (see below – 'For what purposes does BCC Corporate collect and process your Personal Data?').

BCC Corporate has partially outsourced the processing of its transactional and customer data to Atos Worldline, acting in its capacity of data processor in this respect, Atos Worldline adheres to the instructions set out in a separate controller to processor agreement.

### Changes to the Privacy Statement

Since we may change this online privacy statement, we recommend that you check the current version available from time to time. If we make changes to this statement, we will update the “Effective Date” at the top of this page.

#### **What is in this online privacy statement?**

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#### **What information does this online privacy statement cover?**

This online privacy statement describes how we (and our Service Providers) may collect, use, share, and keep information that we get about you online. We gather online information if you:

- Visit or use our websites or apps;
- Participate in the online programs we offer with our Business Partners;
- Receive or reply to electronic communications from us;
- View or click on our ads or other online content; and
- Interact with us through social media websites and other websites and apps.
- Apply for an BCC corporate product or service

In this statement, we also explain how we may combine Online Information with other information and how we then use the combined information.

#### **What information do we collect online and how do we collect it?**

The types of information we collect depends on which product or service you use.

Sometimes you give information directly to us (or to our Service Providers). For example, you might give us your name, account number, email, mailing address, phone number, or date of birth when you:

- fill out an online form or survey, including when you complete a card application or book travel with us;
- register, log into or update the settings on your account using our online services;
- register or enroll in our programs;
- enter a contest or register for a marketing offer; or

- buy something on our websites or apps.

We (and our Service Providers or Third-Party Ad-Servers) also collect information through Cookies and Similar Technologies. Most Cookies and Similar Technologies will only collect De-Identified Information such as how you arrive at our website or your general location. However, certain Cookies and Similar Technologies do collect Personal Information. For example, if you click Remember Me when you log in to our website, a cookie will store your username.

We (and our Service Providers or Third-Party Ad-Servers) may collect information using Cookies and Similar Technologies about:

- the device you use to browse our websites or use our apps (for example, we may collect information about the operating system or the browser version and the type of device you use to open electronic communications from us);
- the IP Address and information related to that IP Address (such as domain information, your internet provider and general geographic location);
- browsing history on our websites or apps (such as what you search for, the pages you view, how long you stay, and how often you come back);
- how you search for our websites or apps, from which website or app you came from, and which of our Business Partners' websites you visit;
- which ads or online content from us and our Business Partners you view, access, or click on;
- whether you open our electronic communications and which parts you click on (for example, how many times you open the communication); and
- the location of your mobile device (for example, to help prevent fraud or when you register to receive location-based content on our mobile websites or apps).

We (and our Service Providers or Third-Party Ad-Servers) may also collect information made publicly available through third-party platforms (such as online social media platforms), through online databases or directories, or that is otherwise legitimately obtained. For an overview of our cookie policy we kindly refer to [include hyperlink to our Cookie Policy]

### **How do we use the information we collect about you?**

We may use Online Information we collect about you on its own or combine it with Other Information to:

- deliver products and services, including to:
  - recognize you when you return to our websites or use our apps;
  - complete transactions;
  - tell you about updates to your accounts, products, and services;
  - update you about new features and benefits;
  - answer questions and respond to your requests made through our websites or apps and through third-party websites (including social media);
  - use the location of your mobile device for location-based services that you may request;

- determine how to best provide services to you and manage your accounts, such as the best way and time to contact you;
- improve our websites or apps and make them easier to use;
- advertise and market our products and services – and those of our Business Partners – including to:
- present content that is tailored to your interests, including Targeted Advertising;
- send or provide you with ads, promotions, and offers;
- analyze whether our ads, promotions, and offers are effective;
- help us determine whether you may be interested in new products or services;
- conduct research and analysis, including to:
  - better understand our customers and our website or app users;
  - allow you to give feedback by rating and reviewing our products and services and those of our Business Partners;
  - produce data analytics, statistical research, and reports;
  - review and change our products and services;
- manage fraud and security risk, including to:
  - detect and prevent fraud or criminal activity;
  - safeguard the security of your information;
  - honour specific measures directed against countries or persons, for which your transactions must be checked and, in some cases, blocked, in compliance with the legislation on specific measures (including Council Regulations (EC) 2580/2001 and 881/2002); assess credit risks relating to our business, including to:
    - evaluate and process your applications for our products and services and manage your existing accounts; (for example, to contact you with important information about your account) and
- use it in other ways as required or permitted by law or with your consent.

BCC Corporate itself imposes a number of restrictions, including:

- BCC Corporate does not gather any data for children under 18 regarding their financial situation or on people other than these children without the consent of the legal representative,
- BCC Corporate does not sell or lease your Personal Data to third parties.

Under direct marketing, BCC Corporate does not use:

- automatic data collection techniques, i.e. applications that siphon off certain Personal Data from the Internet without human intervention,

- spyware.

BCC Corporate sometimes facilitates the publication of (personal) data via social media such as Twitter and Facebook. These social media have their own terms of use which you yourself are required to take into account and observe if you make use of them. Publication on social media may have (undesired) consequences, including for your privacy or that of persons whose data you share, such as the impossibility of withdrawing publication in the short term. You must estimate these consequences yourself, for you are taking the decision about the publication on these media. BCC Corporate does not accept any responsibility in that regard.

### **How do we share your information?**

Some Online Information is Personal Information.

#### **How we treat your Personal Information**

We do not share Personal Information with anyone except as described below. We may share Personal Information as required or as permitted by law, such as:

- with credit bureaus and similar institutions to report about your financial circumstances, and to report or collect debts you owe;
- with regulatory authorities, courts, and governmental agencies to comply with legal orders, legal or regulatory requirements, and government requests;  
with our Service Providers, regulatory authorities, and governmental agencies to detect and prevent fraud or criminal activity, and to protect the rights of BCC Corporate or others;
- with our Service Providers who perform services for us and help us operate our business (we require Service Providers to safeguard Personal Information and only use your Personal Information for the purposes we specify);
- with financial institutions or Co-brand Partners with whom BCC Corporate jointly offers or develops products and services (but they may not use your Personal Information - in particular your email address - to independently market their own products or services to you unless you consent that they can do so);
- in the context of a sale of BCC Corporate or their assets; or
- for specific products or services, when you have given your consent.

We may transfer Personal Information to Service Providers (e.g. Worldline), for example, to process transactions and provide you with our products or services. Regardless of where we process your information, we still protect it in the manner described in this online privacy statement and according to the applicable laws.

#### **How we handle Aggregated Information and De-identified Information**

Aggregated Information or De-identified Information does not identify you individually; it helps us to analyze patterns among groups of people. We may share Aggregated Information or De-identified Information in several

ways, for example:

- for the same reasons as we might share Personal Information;
- with Business Partners to help develop and market programs, products or services and present targeted content including Targeted Advertising;
- with Business Partners to conduct analysis and research about customers, website and app users; or
- with Third-Party Ad-Servers to place ads (including ads of our Business Partners) on various websites and apps, and to analyze the effectiveness of those ads.

### **How do we keep and safeguard your information?**

We, or our carefully selected partners use administrative, technical and physical security measures to protect your Personal Information. These measures include computer safeguards and secured files and facilities. We, or our carefully selected partners take reasonable steps to securely destroy or permanently de-identify Personal Information when we no longer need it. We will keep your Online Information only as long as we must to deliver our products and services, unless we are required by law or regulation or for litigation and regulatory investigations to keep it.

### **What are your rights?**

You will always have a right to access, update, and change or correct your Personal Information.

- In the first place you can contact our call center if you wish to exercise your rights. You will be asked to complete a form in certain cases.
- Any complaints may be addressed to Michael Fürer / Nicolas Ancot, General Managers of BCC Corporate, 66 Boulevard de l'Impératrice, 1000 Brussels.

For more information, or if you do not agree with BCC Corporate's views, you may contact the Belgian Privacy Commission via the website: [www.privacycommission.be](http://www.privacycommission.be).

Please note that BCC Corporate may contact you, even if you have objected to direct marketing, for other purposes, such as a legal requirement or for the performance of a contract and servicing (e.g. account statements, fraud prevention, ...).

### **What are your choices about how we market to you?**

You can choose if and how you would like to receive marketing communications, including direct marketing - whether we send them to you through postal mail, email and/or telephone. If you choose to not receive marketing communications from us, we will honour your choice. Please be aware that if you choose not to receive such communications, certain offers attached to the products or services you have chosen may be affected. We will still communicate with you in connection with servicing your account, fulfilling your requests, or administering any promotion or any program in which you have elected to participate.

### **Security and confidentiality**

Only people properly authorized may access Personal Data that is relevant to performing their job. These people may only use the data to the extent this is essential to do their job and the purposes as set out in this Privacy Policy. They are bound to observe strict professional secrecy and to comply with all technical instructions and requirements designed to safeguard the confidentiality of the Personal Data and the security of the systems that contain this data.

BCC Corporate takes internal technical and organizational measures to prevent Personal Data being accessible to and processed by unauthorized parties, or being accidentally changed or deleted. There are internal security measures in place to protect the premises, servers, network, data transfers and the data itself. This security is supervised by a specialist department.

But BCC Corporate does not have any, or adequate, influence on certain aspects of (the technical process of) data processing. This is true, for instance, of Internet or mobile communication methods (e.g. smartphones), where it is not possible to provide full security. When criminals, (including computer criminals such as hackers), are active, BCC Corporate cannot be expected to always succeed in preventing attacks. Sometimes BCC Corporate itself is unaware of such crimes, for instance if someone succeeds in using your identity details by installing spyware on your computer or by means of phishing. That is why you are also asked to take into account that certain channels are less secure than others when transferring data to BCC Corporate or requesting BCC Corporate to transfer certain data to you.

There are things you can do to prevent potential misuse, or at least make it more difficult. These include:

- installing antivirus software and keeping it up to date
- not leaving your equipment and means of access unattended and reporting the loss of means of access immediately
- logging out if you are not using an application (even temporarily)
- keeping your passwords strictly confidential and using strong passwords, i.e. avoiding obvious combinations of letters and figures and combining enough of both
- being vigilant about anything out of the ordinary, such as an unusual website address (e.g. www2.bcc.be), or unusual requests (e-mail requests for customer details), etc.
- complying with special instructions and guidelines from BCC Corporate.

## Glossary

**Aggregated Information** - data or information, relating to multiple people, which has been combined or aggregated. Aggregated Information includes information that we create or compile from various sources, including card transactions or certain data from Cookies and Similar Technologies.

**Business Partners**- any third parties with whom we conduct business and have a contractual relationship, such as a business that accepts BCC Corporate branded cards.

**Co-brand Partners** - businesses we partner with to offer cards featuring both brand logos.

**Cookies and Similar Technologies** - a cookie is a small data file that a website transfers to your computer's hard drive. We may place cookies when you visit our website or another company's website where our ads appear or when you make purchases, request or personalize information, or register for certain services. If you accept the cookies used on our website, websites that are "powered by" another company on our behalf, or websites where our ads appear, you may give us access to information about your interests. We may use that information to personalize your experience. Similar technologies such as web beacons, pixels, gifs, and tags also do the same thing. We use the term *Cookies and Similar Technologies* in this statement to refer to all technologies that collect information in this way. For more information about cookies, please [click here](#).

**De-identified Information** - data or information used in a way that does not identify you to a third party. We often

derive De-Identified Information from Personal Information. It includes information that we may collect from various sources, such as card transactions or certain data from Cookies and Similar Technologies.

**IP Address** - a number assigned to a device when connecting to the Internet.

**Online Information** - data or information collected on the BCC Corporate website and apps as well as on websites and apps of third parties relating to topics about our business which includes Personal Information, Aggregated Information and De-Identified Information.

**Other Information** - BCC Corporate internal information (for example, transaction data), external data that financial companies use to process applications and complete transactions, and other online and offline information we collect from or about you.

**Personal Information**- information that can identify a person, such as name, addresses, telephone number, and email address.

**Service Providers** - any vendor, third party and/or company that performs business operations on our behalf, such as printing, mailing, and other communications services (email, direct mail, etc.), marketing, data processing, servicing, collections, or ad management.

**Targeted Advertising** - ads we, or our Service Providers, display on websites outside the BCC Corporate Family of Companies based on the preferences or interests inferred from our data, such as transaction data, or data collected from a particular computer or device regarding web viewing behaviours over time and across different websites. Targeted Advertising includes Online Behavioural Advertising.

**Third-Party Ad-Servers** - companies that provide the technology to place ads on websites (and apps) and track how ads perform. These companies may also place and access cookies on your device. The information they collect from our websites is in a form that does not identify you personally.