



Cookie Policy

ING Luxembourg

Issuing date: December 2024

Purpose and scope of this Cookie Policy

This is the Cookie Policy of ING Luxembourg S.A. and its subsidiaries, ING LEASE Luxembourg S.A. and ING Solution Investment Management S.A. (together, 'ING Luxembourg', 'ING', 'we', 'us' and 'our').

This Cookie Policy applies to us in relation to the cookies and similar technologies used on our websites <https://www.ing.lu>, <https://www.ing-isim.lu> and our online applications (apps), such as My ING, and to the personal data of visitors we collect and process through these cookies and similar technologies as data 'controller' (as this concept is defined in the EU General Data Protection Regulation 2016/679 (also referred to as "GDPR")). To the extent to ING Luxembourg processes personal data in this context, we are subject to the data protection obligations set out in the GDPR.

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1. Everything you need to know about cookies:

1.1. 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 our website 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 so-called 'similar technologies' can be found in Section 5 of this policy.

A list of the cookies used by ING Luxembourg is set out in the table in Section 6 of this policy.

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.

2.1. 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'.

2.2. You can 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 management' on the bottom part of the webpage. You can also delete your cookies by using your browser's internet options. In this case, 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. Edge, Firefox or Chrome) and - of your device (e.g. tablet, computer or smartphone).

Deleting cookies in Google 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'.

Deleting cookies in Microsoft Edge: Go to 'Settings and more > Settings > Privacy, search, and services > Clear browsing data > Clear browsing data now'. Under 'Time range', choose a time range from the list. Select 'Cookies' and other site data, and then select 'Clear now'.

Deleting cookies in Mozilla 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'.

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.

2.3. 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 based on 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.

Persistent 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 Section 6: ‘Which cookies and similar technologies are used by ING?’

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

ING distinguishes between 2 types of cookies:

- Essential cookies
- 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 tracked in a database, 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.

4.1.1. 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 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 come under the notion of “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 when they process personal data on behalf of ING.

4.2. What are non-Essential cookies?

Non-essential cookies are not strictly necessary to supply and operate our website and online applications.

We use these cookies in order notably to improve the content and user experience of our website.

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.

4.2.1. 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.

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

Certain non-essential cookies and similar technologies can sometimes be used for marketing purposes. "Similar technologies" refer for instance to pixels and encrypted email addresses (or 'hashed e-mails') and are notably intended for placing advertisements on your social media and other third-party websites.

Of course, marketing cookies will be used only if you have given your consent to do so. These cookies are used to enable functionality from third parties, such as video players.

If you have consented to the use of such cookies, your data will be used e.g. for targeting purposes to build a profile of your interests to show relevant & personalized Google advertising. ING indeed uses YouTube (owned by Google) as its video platform. YouTube hosts/stores videos on its servers for ING. YouTube cookies are placed on visitors' devices when they watch YouTube videos on our website. The data collected via the cookies are sent to Google, and ING is not in control of the data. Google can use this data to show relevant advertising in other sites and resources. Cookies from YouTube belong to ING "Marketing" cookie category, as ING does not host/store the videos, and the associated data is sent to Google. In order to obtain more information on these YouTube cookies, which are frequently updated and changed by Google (i.e. YouTube's owner), you can refer to <https://policies.google.com/technologies/cookies> and you can also access your browser's 'developer tools'.

5. Who installs and manages cookies?

When you visit our websites, ING installs most 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'.

Some cookies are generated in collaboration with a partner (such as companies that provide technology to analyze websites). These are called 'third-party cookies'. These external parties can also be referred to as data 'processors' of ING when they process personal data on behalf of ING.

When these external third parties process personal data for their own purposes, they also act as data 'controllers'. This is for instance the case of Google in relation to the cookies it places when we choose to embed YouTube videos on our website. In order to obtain more information on these YouTube cookies, which are frequently updated and changed by Google (i.e. YouTube's owner), you can refer to <https://policies.google.com/technologies/cookies> and you can also access your browser's 'developer tools'.

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

Below is a list of all the cookies and similar technologies that we use on our websites, 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 / Data Processor for ING	Category	Name	Purpose	Validity corresponds to a cookie if technology not mentioned
Didomi	Data Processor	essential	didomi_token	This cookie contains consent information for personalized purposes and providers, as well as information specific to Didomi (e.g. user ID).	- 6month for the cookies - permanent for the local storage
Didomi	Data Processor	essential	euconsent-v2	This cookie contains the 'Transparency and Consent Framework' (TCF), an Interactive Advertising Bureau (IAB) standard consent collection and information channel, for all vendors and all IAB standard purposes.	6 months
ING	Data Controller	essential	__gdic	For safe digital banking and fraud prevention	2 years
ING	Data Controller	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 a unique session identifier.	session
ING	Data Controller	essential	ING_LANGUAGE	Storage of user language in My ING	session

ING	Data Controller	essential	isim-profile-cookie	Stores the profile and country of residence of the visitor based on his answers to give the access to the consultation of investment products. This is a regulatory obligation.	1 day
ING	Data Controller	essential	IV_JCT	Contains the appropriate junction information for server-relative links on the visitor's side.	session
ING	Data Controller	essential	JSESSIONID	Preserves users states across page requests.	session
ING	Data Controller	essential	omniture_optout	These cookie stores information on whether it is permissible to analyze the visitor's user behavior using Adobe Analytics.	session
ING	Data Controller	essential	PD_STATEFUL...	Session index cookie used by our security system to the specific session of the visitor.	session
ING	Data Controller	essential	PD-S-SESSION-ID	Indexes a session in the Reverse Proxy session cache (or DSC if that is being used).	session
ING	Data Controller	essential	TS01...	This is a security cookie. TS cookies are F5 server cookies installed by the ASM.	session
FundInfo.com	Data Processor	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	Data Processor	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?

We respect your privacy and only use non-essential cookies if you have given us your explicit consent to do so, in accordance with European regulations (GDPR - General Data Protection Regulation). More information about the processing of your personal data by ING in Luxembourg can be found in ING's Privacy Statement for customers, which is accessible on <https://www.ing.lu>.

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. These rights are subject to conditions.

To exercise the forementioned rights or to learn more about ING's data privacy policies and how we use your personal data, you can primarily contact us through our usual channels by:

- Connecting to your [My ING](#) native/web app and send us a secured message with a reference to 'Data Protection'.
- Contacting your relationship manager, your Personal or Private Banker.
- Email:
 - 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:

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

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
- Letter: Data Protection Office, 26, Place de la Gare, L-2965 Luxembourg.

You may also lodge your complaint with the Luxembourg Data Protection Authority (the Commission Nationale pour la Protection des Données or CNPD):

- Letter : 15, Boulevard du Jazz L-4370 Belvaux
- Website: <https://cnpd.public.lu>

9. Changes to this Cookie Policy

We may amend this Cookie Policy to remain compliant with any changes in law and/or to reflect how our business processes personal data. This version was created in December 2024. The most recent version is available at <https://www.ing.lu>.