

Privacy Policy

Introduction

Ikano S.A. (“**Ikano**”) respects your privacy and is committed to protect your Personal Data by being compliant with this privacy policy (“**Policy**”). In addition to Ikano, this Policy also applies to Ikano Capital S.A. and Ikano Insurance Advisory S.A., (for the avoidance of doubt, when reference is made to “Ikano”, this includes the abovementioned entities *mutatis mutandis*).

The terms “**we**” or “**our**” used in this Policy refer to Ikano.

Definitions

Within the meanings of applicable data protection law (in particular EU Regulation 2016/679, the “**GDPR**”):

“**Controller**” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data. Under the scope of this Policy, Ikano acts as Controller.

“**Data Subject**” means a natural person whose Personal Data is Processed.

“**Personal Data**” means any information relating to an identified or identifiable natural person. Examples: name, contact information, email address, birthdate, photographs, employment number, customer numbers, IP number, personal "user identities". Encrypted information also constitutes Personal Data.

“**Process/-ing/-ed**” means any operation or set of operations performed upon Personal Data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

“**Processor**” means a natural or legal person, public authority, agency or other body Processing Personal Data on behalf of the Controller.

“**Recipient**” means a natural or legal person, public authority, agency or another body, to which the Personal Data is disclosed, whether a third party or not.

“**Sensitive Personal Data**” means data which reveals a person’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, processing of genetic data, biometric data, health, sex life or sexual orientation.



This Policy describes the Personal Data that we collect from you, or that you provide and how such data may be used or disclosed by us.

Please read the following carefully in order to understand our policies and practices regarding your Personal Data and how we will treat it.

Individuals concerned by this Policy

This Policy relates to the collection and use of the Personal Data relating to the following categories of Data Subjects:

- visitors of the group.ikano website (the “**Website**”);
- representatives, employees, contact persons or any other related persons of Ikano’s suppliers, third party service providers and subcontractors; and
- potential customers.

Our Policy does not apply to information collected on any third-party website that may link to or be accessible from our Website.

By using or accessing our Website, you agree to our Policy. Our Policy may change from time to time and your continued use of the Website is deemed to be an acceptance of such changes, so please check our Policy periodically for updates.

Through this Policy, all Data Subjects whose Personal Data is Processed by Ikano are receiving information concerning, among other things, the purpose of the Processing, the Recipient of the information, the Data Subject’s rights etc. prior to the beginning of the Processing.

When the Data Subject is in contact with any Ikano employee, a link to the Policy is provided in the employee’s email signature which is included when such employee responds to an email received from you.

Job applicants applying to positions at Ikano by sending an email to the email address indicated on the Website, will be informed about Ikano’s Processing of their Personal Data in accordance with Ikano’s Employee Privacy Policy.

Information we collect and use about you

We collect several types of information from and about you, including, for example:

- in relation to visitors of our Website – information we collect as you navigate through our Website or by any other way, including but not limited to, IP addresses, cookies and web beacons and records and copies of your correspondence (including email addresses) if you contact us;
- in relation to other Data Subjects – records and copies of your correspondence (including email addresses) if you contact us, as well as other information as may be obtained from the Data Subject or from a third party with the Data Subject’s knowledge such as (i) identification data (including name, date and place of birth, gender), (ii) contact information (such as phone

number, home address, country of residence), (iii) other relevant personal details (nationality, citizenship, company your work for), (iv) types of services received or products bought, (v) financial and banking information and (vi) any other Personal Data reasonably related to the conduct of Ikano's business; and

- Personal Data in order to fulfil the business relationship between Ikano and such Data Subject/third party.

Why we collect and use this information

When you visit our Website, we may collect Personal Data from you in order to allow us to provide certain services to you such as answering to your questions or providing marketing information. You may also provide us with your Personal Data when you communicate with us through any contact forms on our Website, register to download material, apply for a job or internship, sign up for newsletters, request to attend an event proposed by our Website or search on our Website.

You may also directly provide your Personal Data to us through any interaction that you may have with one of Ikano's employees (e.g. when giving a business card etc.).

We may also collect and use Personal Data if it is provided to us by your employer, your company or a company to which you are otherwise related to in the context of an agreement or relationship between us and your employer or such company.

We will Process your Personal Data for the purposes listed above on the basis of one or more of the following:

- The Processing is necessary for the performance of an agreement or for entering into an agreement with you.
- The Processing is necessary for us to comply with a legal obligation, for instance to allow us to comply with applicable commercial or tax laws and any regulatory obligations and to allow us to respond to requests and comply with requirements from public authorities.
- The Processing is necessary for our or a third party's legitimate interests, for example:
 - (i) in the context of the Website: to answer any queries from you or provide requested services, to provide newsletter services and other email marketing regarding services you receive from Ikano, managing other requests (e.g. to attend an event) or to notify you about any changes to our services, to make statistics, to present our Website and its contents in a suitable and effective manner for you, to use our cookies, to enforce our Terms of Use and other agreements; and
 - (ii) outside the context of the Website browsing: to provide our services, to manage our relationships with our suppliers, services providers and subcontractors as well as to prevent fraud and credit risk, manage litigation and to protect the rights, property, or safety of Ikano and its affiliates.

- You have given your prior consent, for example, to receive commercial communications from us or third parties or for us to use third party cookies.

Usage Details and IP Addresses

We may collect statistical information about our Website users' equipment, browsing actions and patterns. Such information derives from your visit to/any navigation of the Website. The information may include, for example: (a) traffic, location data, logs and other communication data, (b) information regarding the resources that you access, and (c) information about your computer and Internet connection (e.g. including your IP address, operating system and browser type) for system administration.

Cookies

We may obtain information about your general Internet usage by using cookies. A cookie is a small file stored on the hard drive of your computer or in your browser memory when you visit our Website. Use of cookies helps us to improve our Website and to deliver a better and more personalised service by enabling us to:

- estimate our audience size and usage patterns;
- store information about your preferences, allowing us to customise our Website according to your individual interests; and
- recognise you when you return to our Website and know what parts of the Website you visit, your preferences and what is most relevant to you.

Accepting cookies means that you permit communication between your computer and our Website. You may refuse to accept cookies or be alerted when cookies are being sent to you by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website or the Website will not function properly. Unless you have adjusted your browser setting so that it will refuse cookies, your system will continue to accept cookies when you direct your browser to our Website.

We use the following kinds of cookies on our Website:

- Session cookies – These cookies which last only for the duration of your visit. These enable us to identify that the same person is moving from page to page. We store and collect a unique ID to track your session from page to page via session cookies.
- Persistent cookies – These cookies last beyond your session enabling an enhanced user experience when you return to the site.

- Third party cookies – We use cookies from third parties to collect statistics about our visitors and measure how many people are using our Website and how they are using it. You have a choice to consent or not to such cookies directly while navigating through our Website through a specific visible banner.

Web beacons

Pages of the Website may contain electronic images known as web beacons (also referred to as single-pixel gifs). Web beacons enable Ikano to collect certain information in relation to Website users including, for example, the number of users accessing each webpage, traffic data, location data, logs and other communication data, information in relation to resources access, and information about user computer and Internet connection (including IP addresses, operating systems and browser type). Web beacons are only used to compile aggregated statistics concerning use of the Website and to verify system and server integrity. You have a choice to consent or not to the use of such web beacons directly while navigating through our Website through a specific visible banner.

Disclosure of your information

We may, in order to achieve the purposes listed above, disclose your Personal Data to other companies within the Ikano Group, to contractors and service providers which we engage to support our business and, to the extent required by applicable law, to public authorities and related bodies.

You are informed that certain Recipients mentioned above may be located outside the territory of the European Union in countries that do not offer a level of protection equivalent to the one granted in the European Union. Such Recipients may include, but are not limited to, from time to time the Ikano entities outside the European Union.

Any Personal Data transfer to such third parties will, depending on the nature of the transfer:

- be covered by appropriate safeguards such as standard contractual clauses approved by the European Commission, in which case the Data Subject may obtain a copy of such safeguards by contacting us; or
- be otherwise authorized under applicable data protection law, as the case may be, as such transfer is necessary for the performance or execution of a contract concluded in the Data Subject's interest or for the establishment, exercise or defence of legal claims or for the performance of a contract between the Data Subject and us.

Data security

We have implemented administrative, technical and physical safeguards for our Website to protect your Personal Data from loss, misuse, unauthorised access, disclosure, unauthorised alteration or unlawful destruction. In addition, we require any IT and security service providers to put in place appropriate technical and organisational security measures in respect of any of your Personal Data.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our Website. Any transmission of Personal Data is at your own risk.

Your rights

You have the following rights regarding the use of your Personal Data by us (subject to applicable exemptions):

- right to access the Personal Data held about you and receive additional information about how it is Processed;
- right to correct any inaccurate and complete any incomplete Personal Data;
- right to delete your Personal Data from our systems, e.g. where the Personal Data is no longer necessary in relation to the specified purposes;
- right to restrict the Processing of your Personal Data in certain circumstances, e.g. where you contest its accuracy or object to its Processing;
- right to receive your Personal Data in an interoperable format, or have it directly transmitted to another organisation;
- right to withdraw your consent at any time where you have provided us with your consent to the Processing of Personal Data, in particular regarding the receipt of commercial communications and cookies processing analytics;
- right to object to the Processing of your Personal Data, in certain circumstances and considering other regulatory requirements, in particular where we rely on legitimate interests, including for profiling; and
- right to lodge a complaint with the competent European Union Data Protection Authority (which generally is located in the country you or Ikano is located).

We will respond to individual complaints and questions relating to privacy and will investigate and attempt to resolve all complaints. Ikano will only be able to answer favorably to any of the above requests related to the right to oppose, right of erasure and right of restriction provided that it does not interfere with or contradict a legal obligations of Ikano (e.g. a legal obligation to keep the related Personal Data) or due to any other impediment that would justify that Ikano would not be able to grant such requests.

We undertake to handle each request free of charge and within a reasonable timeframe of one (1) month.



Ikano has set up a Data Protection Organisation in order to manage and monitor Ikano's compliance with data protection obligations. If you wish to make a request in relation to any of the rights listed above, you may contact them for any question or queries you may have regarding this Policy.

The Data Protection Organisation is headed by:

Group Legal

Email: dpo@ikano.lu

Data Retention

We will retain your Personal Data only for as long as necessary for the relevant Processing activity in accordance with applicable data protection laws and/or for as long as is necessary to comply with all relevant statutory and regulatory requirements.

Changes to our Policy

We will post any changes we make to this Policy on the Website. If we make material changes to the Policy, we will notify you through a notice on the Website. Any revision of the Policy will, for first time visitors, be effective immediately upon it is posted on the Website, and for repeated visitors, one (1) month after it is posted.

Contact information

To ask questions or comment about our Policy and our privacy practices, contact us at: dpo@ikano.lu