

Grip privacy statement

December 2021

This is the privacy statement for the Grip app. This app is offered by ABN AMRO Bank N.V., which has its registered office and principal place of business at Gustav Mahlerlaan 10, 1082 PP Amsterdam, the Netherlands. ABN AMRO Bank N.V. is responsible for the processing of personal data in the Grip app. Please read the privacy statement carefully before you use the Grip app

What is the Grip app?

The Grip app shows you what is going into and out of your bank account and allows you to link different accounts and banks to improve your grasp of your financial situation. Grip automatically categorises your income and expenditure so that you have an instant view of your spending, for instance on groceries or a night out. The app also gives tips and pointers on how to save money and offers options for saving towards a specific goal, among other things.

Recurring expenses

The Grip app also offers you the option to filter recurring expenses, such as membership or subscription fees and regular expenses. This functionality is optional. It requires your separate consent. In addition to providing insight into recurring expenses, the app also offers the option of cancelling some subscriptions and looking ahead to your possible financial situation in a few months' time. To help you look ahead, we show you an overview of all recurring expenditure and income that we can identify.

Tools

The Grip app offers different kinds of tools. These tools are optional and offer additional information or functions, such as insight into your subscriptions, pension or energy costs if you switch suppliers.

Who is the Grip app intended for?

The Grip app is intended for anyone aged 18 or over who has a current account with a Dutch bank. An up-to-date list of affiliated banks can be found on [our website](#).

Your personal data

This privacy statement explains how we handle your personal data if you use the Grip app. We think carefully about how we use your personal data, and below you can find out more about what we do to protect your privacy. We recommend that you read this privacy statement before you make certain choices in the Grip app.

What is personal data?

Personal data is information that says something about you. The best-known forms of personal data are your name, address, email address, age and date of birth. Personal data also includes your bank account number, telephone number and IP address. There are several special categories of personal data. These include data concerning your health, as well as biometric data, such as fingerprints or data used for facial recognition. We may only use this personal data if this is permitted by law or if you give your consent for this. In all other situations, we are prohibited from using this personal data.

Our contact person for your questions about data protection

We have a designated Data Protection Officer at ABN AMRO. Information on how to contact us can be found in the section headed 'Do you have a complaint or question, or is something unclear?'

When do we process your personal data?

Obviously, we may not request or use your personal data without good reason. By law, we are permitted to do this only if 'the processing has a legal basis'. This means that we may only use your personal data for one or more of the following reasons:

Contract

If you have downloaded the Grip app and accepted the terms and conditions, we need your personal data so that you can use the app. We require this information in order to provide you with information on your income and expenditure or cancel a subscription on your behalf.

Legal obligation

The law contains many rules that we have to comply with as a bank. For example, we must store personal data and, in some cases, provide it to third parties, such as the judicial authorities in the event of financial fraud.

Consent

Sometimes we are required to ask you for your consent. You can read more about this under 'Using personal data with or without your consent'.

Legitimate interest

We also have the right to use your personal data if we have a legitimate interest in doing so. In that case, we must be able to demonstrate that our interest in using your personal data outweighs your right to privacy. We therefore balance all the interests. We explain the situations in which this happens using a few examples:

- ▶ We protect property and personal data belonging to you, to us and to others.
- ▶ We carry out fraud detection activities to help you and us avoid losses.
- ▶ If you use Grip, we may notify you of changes to the app.
- ▶ The Grip app shows relevant tips about Grip products and services.
- ▶ We constantly search for appropriate ways to ensure the highest possible level of protection for your data and for ours.
- ▶ ABN AMRO Group Economics carries out research on topics such as industrial growth in the Netherlands or consumer behaviour. We do not share research or reports from which your personal data can be extracted. The information in shared research and reports is completely anonymous.

Using personal data with or without your consent

Sometimes we have to ask you for your consent to use your personal data. In such situations, we explain what we use the personal data for before you share your personal data with us. Before you give consent, we recommend that you carefully read the information we provide concerning the use of your personal data.

You can also easily withdraw your consent if you no longer want us to use your personal data. You can read how to do this in the Grip app under 'Profile'.

In which situations do we ask you to give consent? We will in any event ask you to give consent in the following situations:

- ▶ When we use biometric technologies, such as facial recognition for unlocking the Grip app.

- ▶ If you have an account with a bank other than ABN AMRO. The Grip app asks for access to your payment details and your account information so that you can make use of the Grip app.
- ▶ When we place cookies and similar technologies in the Grip app to provide you with personalised offers. You can read more about this under 'Cookies and similar technologies'.
- ▶ When we show commercial messages about products or services from one of our partners in the Grip app, for example in the context of money-saving tips. You can read more about this under 'What messages do we send you?'.
- ▶ When we display commercial messages from ABN AMRO, based on your individual payment details, in the Grip app. You can read more about this under 'What messages do we send you?'.
- ▶ If you make use of the 'Recurring expenses' functionality, Grip also filters regular expenses, such as the costs you incur for your mobile phone plan, your health insurance policy, your magazine subscriptions or your trade union membership.

Please note that in certain situations we do not ask for your consent. This is the case if we require your personal data to comply with the law, if a legitimate interest exists, or if this is necessary in the context of the contract that we conclude with you. In such cases, however, you may submit an objection.

What do we use your personal data for?

We use your personal data to help make our services as effective, reliable and efficient as possible. We do this for the following purposes:

- ▶ **Contract.** To be able to enter into contracts with you and perform these contracts. Without your personal data, we cannot provide you with information on your income and expenditure or cancel a subscription or membership on your behalf (if you use that function).
- ▶ **Product improvement.** Do our products still meet your wishes and expectations? We use your personal data to carry out research in this area. We study trends and use personal data with the aim of analysing and improving our products and services. We may use new technologies as part of this.
- ▶ **Communication and marketing.** We provide you with information on the functioning of the Grip app and may send you service messages, for example if there is a message for you in the app concerning new functionalities in the app or a subscription or membership that you have cancelled. The Grip app also shows personalised tips and commercial messages from ABN AMRO and third parties based on your individual payment details (if you have enabled this option).

Other purposes

We may use your personal data for other purposes than the purpose for which you supplied the personal data to us. In that case, the new purpose must be in line with the purpose for which you initially provided your personal data to us. The law refers to this principle as 'compatible use of personal data'. The law does not specify exactly when a use is compatible, although it does provide guidance:

- ▶ Is this purpose clearly related to the purpose for which you initially provided the personal data? Is the new purpose appropriate to the initial purpose?
- ▶ How did we originally receive the personal data? Did we obtain the personal data directly from you or in another way?
- ▶ What kind of personal data is concerned exactly? Is the personal data in question considered sensitive to a greater or lesser degree?
- ▶ How would you be affected you? Would you benefit, suffer or neither?
- ▶ What can we do to ensure the highest possible level of protection for your personal data? Possibilities include anonymising, masking or encrypting your personal data.

Who do we share your personal data with?

There are situations in which we need to provide your personal data to other people and organisations involved in the Grip app. You can read more about them below.

Our service providers

We work with other companies that help us with the Grip app. This is referred to as outsourcing. We are not permitted to pass your personal data on to them without good reason. There are rules that banks must comply with. We carefully select these companies and reach clear agreements with them on how they are to handle your personal data. We remain responsible for your personal data. We use the concept and technology of Tink AB, Sweden, for the Grip app. Tink processes your data (for example, Tink categorises your transactions) so that you can make use of the app. We use the system and technology developed by Subaio, a third party based in Denmark, to provide the functionality for filtering recurring expenses and cancelling memberships or subscriptions.

Business partners

From time to time we work with other parties, for example to offer tools for comparing expenses and saving money. In such cases, we always check first whether sharing information with business partners is permitted.

Sometimes we share joint responsibility for the use of personal data with a business partner (joint controllers). We reach agreement with these parties on who plays what role, and how we jointly safeguard your data protection rights.

Warning system used by financial institutions

Financial institutions in the Netherlands have developed a warning system to protect the safety and security of ABN AMRO and the banking sector. This system allows banks to check whether a person:

- ▶ has ever committed fraud
- ▶ has tried to commit fraud
- ▶ poses a threat to the safety and security of the banking sector.

For more information, please visit the website of the [Dutch Banking Association](#).

What messages do we send you?

If you are an ABN AMRO client, we may send you commercial messages about ABN AMRO products and services. If you are not an ABN AMRO client, we will first ask for your consent before we send you any commercial messages. We may use profiling to tailor our commercial messages to your specific needs. Profiling means that we select and target a specific client group; we may, for instance, send a message about a savings account to clients who do not currently have one. You have the right to object to profiling at any time.

If you have given your prior consent in the Grip app, we may show you commercial messages from ABN AMRO and/or other parties based on data in the Grip app, including individual transaction details. Under no circumstances will we share your personal data with other parties without your consent.

If you do not want us to send you any commercial messages at all, you can opt out when you next receive a commercial message from Grip. You can also opt out by going to 'Profile' in the Grip app.

Cookies and similar technologies

The Grip app uses the Google Firebase SDK to measure app usage. We use this to identify which features are most popular with our users, for example. If the app shuts down unexpectedly, we are sent information to enable us to identify the cause. We have concluded a processing agreement with Google to cover these Google services. IP addresses are processed in the Grip app, and the last octet of your IP address is made unidentifiable by us.

Google is not permitted to use the personal data for its own purposes.

Cookies from other parties are also used. We use these cookies to show you offers and information that may be of interest to you. We would like to show you, with your consent, useful information in our app, on our websites and on the websites of third parties. We therefore endeavour to make the best possible assessment of what would, and would not, be of interest to you. The information shown to you differs from that shown to other users, and is based on the apps you use and the websites you visit. In this way, we make our apps and websites more relevant to you.

If you are a client of ours, we can also combine this data with the information we already have about you. For example, we will not show you certain products if you already have them. We use Google Firebase SDK and Appsflyer SDK to show you relevant offers. We show these offers in Mobile Banking, in Internet Banking, through Bankmail, on third-party websites and in Google services.

How long do we keep the personal data used in the Grip app?

We keep personal data in any event for as long as is necessary to achieve the purpose for which it has been collected. The General Data Protection Regulation (GDPR) and the Dutch GDPR Implementation Act (Uitvoeringswet AVG) do not indicate specific storage periods for personal data. Other legislation may specify minimum storage periods, however, which we must comply with. Such legislation includes the general requirement for businesses to keep records, as set out in the Dutch Civil Code, tax laws or laws governing financial enterprises in particular (such as the Dutch Financial Supervision Act - Wet Financieel Toezicht).

In addition to providing overviews of your current financial situation, the Grip app also offers overviews containing historical information. To enable a full picture to be formed, once you start using the Grip app your transaction data in the app is stored for five years. If you delete your Grip account, all your data will be deleted except for the data that we are required to retain by law.

Do you want to delete your personal data?

If you want us to stop processing your personal data, you can terminate your Grip account. Follow the steps below:

- ▶ Log into the app
- ▶ Go to 'Profile'

- ▶ Go to 'Settings'
 - ▶ Select 'Delete Grip account' and follow the instructions
- Next, submit a request for the deletion of your personal data through [our website](#). We will then delete all your personal data with the exception of the data we are required to retain by law.

Have you deleted the Grip app from your device without terminating your Grip account, or have you not used Grip for a long time? Your Grip account and personal data will be deleted 18 months after you last logged in. If you subsequently decide you want to use Grip after all, you can easily create an account again.

If you no longer wish to use the function for filtering recurring expenses or other tools, you can disable them at any time. In that case, we will retain your personal data for the applicable storage periods.

What rights do you have, and what can you do?

What rights do you have when it comes to your personal data? And what do these rights mean?

Right of access, right to rectification, right to be forgotten, right to restriction

- ▶ You have the right to obtain overview of all personal data relating to you that we use.
- ▶ If your personal data is incorrect, you can ask us to change your personal data.
- ▶ You can ask us to delete your personal data at any time. We are not always able to do this, however, and do not always have to comply with your request, for example if we are required by law to keep your personal data for a longer period of time.
- ▶ You can also ask us to restrict the processing of your personal data on a temporary basis. This is possible in the following situations:
 - ▷ You think that your personal data is incorrect.
 - ▷ We use your personal data wrongfully.
 - ▷ We no longer require your personal data but you still need your personal data (for example following the storage period) in order to bring, exercise or substantiate a claim;
 - ▷ If you submit an objection.

Right to data portability

Do you want to receive the personal data that you have provided to us and that we store by automated means for the purpose of performing a contract? We can arrange this, but only if we process your personal data on the basis of your consent or on the basis of the contract we concluded with

you. This is referred to as data portability.

Please keep your personal data secure

- ▶ If you want to provide your personal data to any party, please check the purpose for which that party wants to use your personal data. For example, you can read the privacy statement on that party's website.
- ▶ If you want to receive your personal data, please make sure that your own equipment is adequately secure and has not been, or cannot be, hacked. Your financial information is very valuable to criminals. If you want to receive the personal data we hold on you or arrange for it to be passed on to another party, you can submit a request to us through the 'Clients' rights' page on our website.

Do you have a complaint or question, or is anything unclear?

If you have any questions, ideas or complaints about Grip, please send an email to grip@nl.abnamro.com.

If you have specific questions about this privacy statement, you can contact the Data Protection Officer: privacy.office@nl.abnamro.com. We are here to help.

If you do not agree with the way in which we use your personal data, you have the right to lodge a complaint through the 'Clients' right's page. You also have the right to submit a complaint to the [Dutch Data Protection Authority](#).

Do you want to read this privacy statement at another time?

You can save our privacy statement on your smartphone, tablet or computer. You can also send a copy (in PDF format) to your email address.

Changes to this privacy statement

Changes to the law or our services and products may affect the way in which we use your personal data. If this happens, we will make changes to the privacy statement and notify you of these changes. We will post any changes on [our website](#) and in the Grip app.