

Annex B to the ABN AMRO Group Binding Corporate Rules

Material Scope BCRs

General domain	Purpose and type of processing	Categories of Data Subjects	Categories of Personal Data	Third Countries ¹
Clients and Client lifecycle management	Client identification and onboarding	Prospects, Clients, UBOs, directors, representatives, traders	<i>Identification data</i> (e.g. name, email address, phone number, identification data including ID, IBAN/BIC, client internal identification number, trader ID, client representatives and director contact information, address of headquarters, chamber of commerce number) <i>Client and service related Information</i> (e.g. contact preferences, client contact and representative contact details, service interests, services requested, financial situation relating to requested services, opt in/opt out, contract(s) and contract details, work permit (where relevant), client information)	Australia, Brazil, Hong Kong, Japan, Singapore, United Kingdom, United States
	Transaction and Market abuse monitoring	Clients, UBOs, Client representatives, directors, traders	<i>Identification data</i> (e.g. name, email address, phone number, client internal identification number, trader ID, client representatives and director information) <i>Client and service related information</i> (e.g. transaction data and historic transaction data, generated alerts, client orders, contact details and records including voice recordings and transcripts, logs of use of ABN AMRO IT systems and applications)	Australia, Brazil, Hong Kong, Japan, Singapore, United Kingdom, United States
	Client lifecycle management	Clients, UBOs, directors, traders, representatives, Employees	<i>Identification data</i> (e.g. name, email address, phone number, identification data including ID, IBAN/BIC, client internal identification number, trader ID, client representatives and director contact information, address of headquarters, chamber of commerce number) <i>Client and service related information</i> (e.g. contract and contract details, offers to the client, client preferences and interest, transactions and transaction history, logs of use of ABN AMRO IT systems and applications, client financial situation and credit score, information about employees involved in client lifecycle management)	Australia, Brazil, Hong Kong, Japan, Singapore, United Kingdom, United States
	Client relationship management	Clients, Employees	<i>Identification data</i> (e.g. name, email address, phone number, IBAN/BIC, client internal identification number, client representatives and director information)	Australia, Brazil, Hong Kong, Japan, Singapore, United States

¹ Third Countries include Adequate Countries, where relevant for ABN AMRO

	(including marketing and record management)		<i>Client and service related information</i> (e.g. opt in/opt out for newsletters, client interests and preferences, logs of use of ABN AMRO IT systems, applications and website visits including cookie settings and historic contact information, information about employees involved in client relationship management)	Kingdom, United States
	Client support	Clients, representatives, data subjects that call Client support, Employees	<i>Identification data</i> (e.g. name, phone number, IBAN/BIC, client internal identification number, employee internal identification number, account number) <i>Client and service related information</i> (e.g. information regarding requests to ABN AMRO and answers provided, client survey information, information on complaints and inquiries handling, voice recordings, transcripts of calls, logs of use of ABN AMRO IT systems and applications, information about employees involved in client support)	Australia, Brazil, Hong Kong, Japan, Singapore, United Kingdom, United States
	Service provision, including banking, financing, market access and clearing services	Clients, Employees	<i>Identification data</i> (e.g. name, phone number, email address, IBAN/BIC, client internal identification number, employee internal identification number, contact details of a regulatory body to report trading activities on behalf of the client as a service) <i>Client and service related information</i> (e.g. contract and contract details, specific service requests or provisions such as reporting trading activities to a regulatory body on request of a client, logs of use of ABN AMRO IT systems and applications, equipment and software information)	Australia, Brazil, Hong Kong, Japan, Singapore, United Kingdom, United States
Employees	Onboarding, Performance and evaluation of employees	Employees	<i>Identification data</i> (e.g. name, phone number, email address, identification data including ID, contact persons, job title, (hiring) line manager, employee internal identification number) <i>Professional data</i> (e.g. job application information, CV, diplomas and information regarding training, background check results, information on evaluation including dates and identities of the evaluators, obtained results, assessment of professional skills and competencies, voice recordings for training purposes, wishes as expressed by the employee, career development forecast, salary and salary growth expectations)	Australia, Brazil, Hong Kong, Japan, Singapore, United Kingdom, United States
	Travel and expense management and relocation services	Employees	<i>Identification data</i> (e.g. name, employee internal identification number, address, travel locations, temporary residence, email address) <i>Professional data</i> (e.g. employee internal identification number, dates of travel, reason for travel, booking reservations, expenses report, credit card expenses, line reporting manager, IBAN/BIC, previous experiences, foreign languages spoken, working permit (where relevant), employees wishes regarding expatriation, data regarding visa)	Australia, Brazil, Hong Kong, Japan, Singapore, United Kingdom, United States

	Talent management and rewards	Employees	Identification data (e.g. name, Job title, employee internal identification number, email address) Professional data (e.g. foreign languages spoken, CV, previous experience, working location, function title, development forecast, salary information, assessment of knowledge and trainings and diplomas)	Australia, Brazil, Hong Kong, Japan, Singapore, United Kingdom, United States
	Payroll management, social benefits, salary payment, pensions, insurance	Employees	<i>Identification data</i> (e.g. name, address, IBAN/BIC, salary wages, employee internal identification number, social security number, family status, bank account number) <i>Professional data</i> (e.g. employee internal identification number, information regarding cost reimbursement, contract type, hours of work and work schedule, work overtime, absences including sick leaves, unpaid leave, vacations)	Australia, Brazil, Hong Kong, Japan, Singapore, United Kingdom, United States
General management and governance	Procurement and IT management, internal directory and employee user access and account management	Employees, Clients, Third parties	<i>Identification data</i> (e.g. name, email address, phone number, employee internal identification number, job title, line manager, team members) <i>Professional and technical data</i> (e.g. office location, user account information, employee internal identification number, access rights, device ID information, technical connection data, login data, IP address, user account information, information relating to monitoring information embedded in and use of applications),(external) client support contact details, information regarding physical location for facility and access management purposes)	Australia, Brazil, Hong Kong, Japan, Singapore, United Kingdom, United States
	General management, reporting and complying with requests from supervisory authorities, disciplinary actions and litigation	Clients, Employees, Management team(s), Third parties	<i>Identification information</i> (e.g. name, email address, phone number, client internal identification number, employee internal identification number, contact information relating to third parties, including business partners, counterparties, law firms, accountancy firms, suppliers, contacts at supervisory authorities, contact details of ABN AMRO group management/global management team, shareholder information) <i>Professional data</i> (e.g. job titles, line manager, office location, delegation of authorities, proxy information, line manager, logs of use of ABN AMRO IT systems and applications, information relating to (potential) disciplinary actions, client or employee related investigations or litigation information, information on previous contacts with ABN AMRO, information on voting rights)	Australia, Brazil, Hong Kong, Japan, Singapore, United Kingdom, United States
	Risk management activities	Clients, Employees, Third parties	<i>Identification data</i> (e.g. name, email address, phone number, client internal identification number, employee internal identification number, client representatives and business contact details, including directors, UBOs and representatives, proxy	Australia, Brazil, Hong Kong, Japan, Singapore, United

			information, contact details of third parties including contact details of supervisory authorities) <i>Professional and business operational information</i> (e.g. client relationship contract, transaction information, order and trading activities, office location, line manager, job title, IP address, technical connection data, user account information, access rights) <i>Operational risk management and incident related information</i> (e.g. operational and credit risks information relating to clients, estimated operational risks, incidents reported, login data, user account information, information regarding (potential) disciplinary actions, logs of use of ABN AMRO IT systems and applications, outcome of investigations and follow-up)	Kingdom, United States
	Security, control, regulatory compliance, whistleblowing, prevention and detection of data loss and fraud	Clients, Employees, Third parties	<i>Identification data</i> (e.g. name, email address, phone number, employee internal identification number, client internal identification number, bank account number, contact details of supervisory authorities) <i>Professional and technical data</i> (e.g. contract type, internal employee identification number, internal client identification number, proxy information, IP address, technical connection data, login data, user account information, access rights, device ID information, device used, logs of use of ABN AMRO IT systems and applications) <i>Incidents and alert information</i> (e.g. incidents and facts reported, evidence, outcome of investigations and follow-up, relation to the person reporting the incident, the person(s) implicated in the incident and the person(s) involved in the investigation)	Australia, Brazil, Hong Kong, Japan, Singapore, United Kingdom, United States