



Dear Sir/Madam,

ING Bank N.V. (“ING”) provides a wide range of financial services to our clients around the world through its licensed branches, representative offices, subsidiaries and affiliates (collectively, the “ING Bank Group”).

Notification to outsourcing activities and centralization of processes and systems.

As part of the continual review of our ability to offer to our clients, comprehensive, efficient and consistent services, ING has undertaken initiatives to centralize its processes and to implement the use of global systems by members of the ING Bank Group in our daily operations. In conjunction with such initiatives, ING shall be outsourcing certain activities to head office, local branches, affiliates within the ING Bank Group or to third party contractors working under the supervision of ING (collectively, the “Service Providers”), who may be based in locations outside the jurisdiction of any branch of ING that is providing a service to you.

The outsourced activities will include, but are not limited to:

- identification and on-boarding of Clients; executing payment and other financial transactions, recording and financially settling services, products and materials delivered to and from ING, including communication with clients involved in contracts (e.g. beneficiaries, intermediaries); and
- business process execution; internal management reporting and analysis; creation of global view of clients; conducting internal audits and investigations; finance and accounting; implementing business controls; IT security and services; provision of central processing facilities for efficiency purposes; and document archiving and storage.

The centralization of some of the activities will allow your client information, which includes both non personal business information and personal data of your officers, shareholders or authorized representatives (the “Client Information”) to be viewed or accessed by employees of the different Service Providers who are based outside your jurisdiction or the jurisdiction of the ING office with whom you do business. The adoption of global systems by the ING Bank Group in our daily operations will also mean that your Client Information could be viewed by employees of the ING Bank Group.

Safeguarding your Client Information

ING has implemented technology risk standards and other internal controls and procedures to maintain the integrity and confidentiality of Client Information. Within the ING Bank Group, access to information in the global systems is governed by user access administration controls as specified by ING’s IT policies and procedures under which users are granted access to the global systems on a need-to basis based on their role and job responsibilities. Employees within the ING Bank Group are subject to our policies for safeguarding the confidentiality and integrity of Client Information.

ING will impose on its Service Providers a contractual obligation of confidentiality in relation to all information they may receive in conjunction with the outsourcing, which will be effective and enforceable under applicable laws. Please be notified, however, that in connection with supervisions or investigations to ensure that the activities of the Service Providers are compliant with applicable law of the jurisdiction in which they are based, your Client information may be disclosed to relevant local authorities having competent jurisdiction over them. The

relevant local authorities may, by written order or due to applicable law, engage in discussion with domestic/foreign government authorities or self-regulatory organizations concerning information obtained during such supervisions or investigations, but should otherwise keep your Client Information confidential.

These arrangements will not affect our existing banking relationship with you and will enable us to leverage the resources of the ING Bank Group to improve operational efficiency. ING is committed to protecting the integrity and confidentiality of the Client Information and will closely monitor the outsourcing arrangements on an ongoing basis to protect the interests of our clients.

Trade Reporting

This section on Trade Reporting applies if your organization trades derivative transactions with ING.

ING is required to comply with mandatory Reporting Requirements (as defined below) for derivative transactions implemented, or to be implemented, by financial regulators worldwide. These Reporting Requirements apply to derivative transactions your organization enters into with ING. In most jurisdictions the relevant transaction information will be reported to a trade repository established to centrally collect and maintain records of derivatives on behalf of the regulator. In order for ING to comply with the Reporting Requirements, your organization's consent is required for the disclosure of information:

- (a) to the extent required or permitted by any applicable law, rule or regulation which mandates reporting and/or retention of transaction and similar information or to the extent required by any order or directive regarding reporting and/or retention of transaction and similar information issued by any authority or body or agency in accordance with which ING is required or accustomed to act ("**Reporting Requirements**"); or
- (b) to and between ING's head office, branches or affiliates, or any persons or entities who provide services to ING or its head office, branches or affiliates, in each case, in connection with such Reporting Requirements,

(such information collectively defined as the "**Trade Data**").

Yours sincerely,

For and on behalf of ING Bank N.V., Tokyo Branch



Riko Kikuchi-Watanabe
Country Manager, Japan