

PRIVACY AND COOKIE STATEMENT ADITIUM

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This is the privacy and cookie statement of *ABN AMRO Payday* ("Payday"). Payday is offered by ABN AMRO Bank N.V. ("ABN AMRO"), which has its registered office at Gustav Mahlerlaan 10, 1082 PP Amsterdam, the Netherlands. ABN AMRO is the controller as referred to in the General Data Protection Regulation ("GDPR").

What is Aditium?

Aditium provides an overview of products and services in the early development phase that we test with end users to determine if there is interest. We test the riskiest assumptions and validate innovative ideas quickly and efficiently for implementation in the financial market.

The goal of [ABN AMRO Innovation](#) is to launch new products and services that fit and strengthen ABN AMRO's 'personal bank in the digital age' strategy. To do this, we need to test and validate business ideas through our innovation process - from conception until invalidation or release. Aditium is a website where new ideas are tested with potential end users under a different name and branding to determine whether there is interest and measure real world behavior. We test under a different name and with a different branding to keep the research as neutral as possible and minimize bias and risks. This market research is necessary for the purposes set on the [ABN AMRO Innovation](#) page.

Who is Aditium for?

Aditium is intended for every visitor who would like to participate in the experiments knowingly or unknowingly offered and thus contribute to the realization of new products or services of ABN AMRO.

Your personal data

This Privacy and Cookie Statement explains how we handle your personal data if you use Aditium. Please read the Privacy and Cookie Statement carefully before you make certain decisions.

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.

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 basis'. This means that we may only use your personal data for one or more of the following reasons:

Legal obligation

The law lays down 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 Netherlands Public Prosecution Service in the event of financial fraud.

Consent

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

Legitimate interest

We 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:

1. We protect property and personal data belonging to you, to us and to others.
2. You will be sent relevant tips and offers relating to Payday's products and services.
3. We aim to keep efficient records and improve our data quality in order to provide you with the best possible service.
4. We conduct research to find out how we can improve our existing processes, develop products and services, and fulfil our legal obligations more effectively. We may use new technologies for this. We will consider which data we can use for developing, training and testing new technologies on a case-by-case basis.
5. We constantly search for appropriate ways to ensure the highest possible level of protection for your data and for ours.

The use of personal data with or without your consent

Sometimes we need to ask you for your permission to use your personal data. First, we will explain for what purpose we will use your personal data before we ask for it. We advise you to read the information we provide you about the use of personal data carefully first.

Did you give permission? And do you want to revoke it? That can be done very easily. You can read how to do this, for example, in the form that explicitly asks for your permission. Good to know: there are situations in which we do not ask permission. This is the case when we need your personal data to comply with the law, when there is a legitimate interest or when this is necessary for the agreement we conclude with you. You can then object.

What personal data does Aditium use for what?

Aditium uses the responses to surveys or other forms of market research to test interest in new products. These answers are anonymous and cannot be traced back to individuals.

In order to carry out the market research efficiently, the surveys are used specifically on social media. Aditium itself does not collect any personal data, but it does provide the relevant target group profiles to the advertiser.

Cookies and similar techniques

What are cookies?

A cookie is a small text file that stores certain information. Cookies are automatically offered to your web browser when you visit a website. The cookies are then stored on your computer, laptop, tablet or mobile phone (depending on which device you use to visit the website).

Analytical cookies

Aditium uses analytical cookies to measure the use of the website. This way we look at which parts are the most interesting and user-friendly. We use this information to better understand the needs of potential end users. The statistics and reports cannot be traced back to individuals.

Tracking cookies

Aditium uses analytical cookies with which we measure the use of our website. In addition, we use social media cookies and advertising cookies with your permission. For example, we can show you personalized advertisements from Aditium on the websites and apps of third parties. We can also exclude you from these types of advertisements. Read below how you can do that.

How can I disable cookies?

You can do this by changing your browser settings so that all cookies are rejected. Important! This may mean that the website does not function optimally. You can also specify in the web browser settings that you want to allow only certain types of cookies or want to be notified whenever a website wants to store a cookie.

The way you change the cookie management settings depends on the web browser you use. You can find information about this in your web browser's help function, or you can visit www.allaboutcookies.org for a step-by-step explanation of how to manage cookies in most web browsers.

How can I delete cookies?

You can delete all the cookies that have already been stored on your computer, laptop, tablet or mobile phone by a web browser. The way you do this depends on the web browser you use. You can find information about this in your web browser's help function, or you can visit www.allaboutcookies.org for a step-by-step explanation of how to delete cookies in most web browsers.

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 provision of our services. You can read more about them below.

Our service providers

We work with other companies that help us provide services to you, such as ICT service providers. We are not permitted to disclose your personal data to these parties without good reason. There are legal rules that banks must comply with in such situations. We carefully select these companies and enter into clear agreements with them on how they may use your personal data. We remain responsible for your personal data.

Sometimes we engage other parties that also provide services, such as lawyers, auditors and bailiffs. These parties bear their own responsibility for their use of your personal data.

Competent public authorities

Our supervisory authorities, the Dutch Tax and Customs Administration, the Netherlands Public Prosecution Service and other public authorities may ask us to provide personal data relating to you. The law specifies when we are required to provide this data.

How do we determine the period for which your personal data is stored?

We keep personal data in any event for as long as is necessary to achieve the purposes for which they have been collected.

The GDPR does not stipulate 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).

Personal data is deleted or anonymised once the storage periods have ended. Certain personal data

may be kept for long for various reasons, for instance as part of our risk management, for security reasons, or in connection with claims, investigations or lawsuits.

When personal data is kept for longer than the storage periods, we take measures to ensure this personal data is only used for purposes that require a longer storage period.

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 to object

If we use your personal data based on a legitimate interest, you have the right to object. It may be the case that you do not want us to use your personal data for profiling. In certain situations, however, we are permitted to do this even if you object, for instance to prevent fraud, manage risks or investigate unusual transactions. In such situations, we will of course comply with the law.

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 for 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 Payday, please send an email to info@aditium.nl

If you have specific questions about this Privacy and Cookie Statement, you can contact the Data Protection Officer: privacy.office@nl.abnamro.com.

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’ rights’ page](#). You also have the right to submit a complaint to the Dutch Data Protection Authority.

Do you want to read this Privacy and Cookie Statement at another time?

You can save our Privacy and Cookie Statement on your smartphone, tablet or computer. Alternatively, you can send it to your email address in PDF format.

Changes to the Privacy and Cookie 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 our Privacy and Cookie Statement and notify you of these changes. We will post any changes on our website.