

# GDPR - Implications for Financial Institutions

ING in Germany / ING-DiBa AG

Harborth, Leila / Data Management & Protection

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# About me

Name:  
Leila Harborth

Currently working at

- ING Germany
- Data Management & Protection for GDPR related projects

## Working Experience

Before worked among others at

- EY
- Commerzbank
- BHF-Bank

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## Education

- Goethe University - Master in Finance & Information Management
- Goethe University - Bachelor in Business Administration & Economics
- San Diego State University - Semester abroad - Economics

# About today's topic

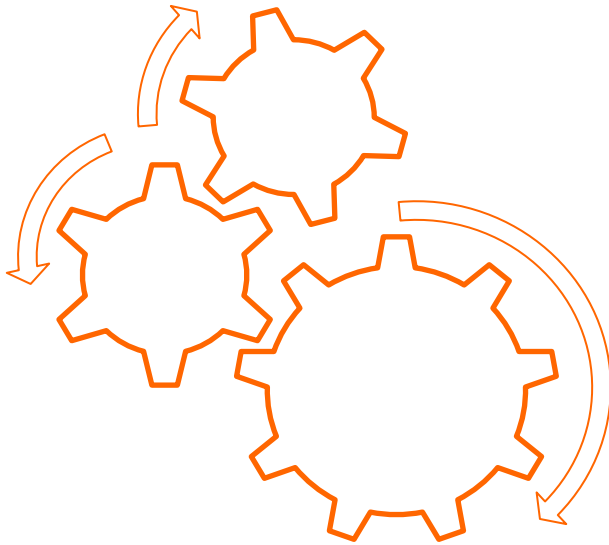
- 1 What is GDPR about?
- 2 What rights do you have?
- 3 Why is GDPR relevant for financial institutions?
- 4 What are possible challenges when implementing GDPR?

# GDPR - Introduction

- The topic of **data protection** is becoming **increasingly important** and is now very present. In times of **increasing digitalization**, a reform and standardization of data protection within the EU became necessary.
- The GDPR is valid since the 25th **May 2018** and concerns also the ING.
- Data protection has long been a topic for ING, but the rules of the game have changed.
- The principles of the GDPR are represented in the following.

# GDPR - Introduction

The central intention of the GDPR is to ensure the protection of personal data. But what does that mean exactly and what are personal data at all?



- The handling of personal data is part of our daily business and therefore unavoidable.
- At the Bank, we work with a wide range of personal data, in particular that of our clients.
- Personal data is more than just the client's name. It can be e-mail addresses, IP addresses and account numbers.
- The more information about a person is available, the more conclusions can be drawn about that person.
- In the following you will find out what other personal data could be.

# GDPR - Personal Data

## Examples

### Personal Data

#### **General personal data**

e.g. name, address, e-mail, telephone number, place of birth

#### **Bank details**

e.g. account numbers, credit information, account balances

#### **Online data**

e.g. IP address, location data

#### **Proofs of identification**

e.g. copy of identity card

#### **Identification numbers**

e.g. personnel number

### Special Categories of Personal Data

#### **Health data**

e.g. diseases, taking medication

#### **Biometric data**

e.g. voice, fingerprints

#### **Beliefs**

e.g. political, religious or ideological

#### **Background**

e.g. cultural, ethnic

#### **Membership to an union**

# GDPR - Processing of Personal Data

Examples

When processing personal data, many of us think of the active use of data, such as creating reports or statements of account.

But processing is much more than that.

It's every process we do with personal information - **both active and passive.**

GDPR

Examples of  
processings of  
personal data

## COLLECTION OF DATA

Adaption or modification of data

CAPTURING OF DATA

RETENTION OF DATA

**Reading data**    Sorting of data

ORGANIZATION OF DATA



# GDPR - Principles

## The GDPR defines principles for the processing of personal data ...

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- ... the data must be used in a **legitimate** and transparent manner.
- ... the data may only be used if there is a fixed clear **purpose** for it.
- ... **only as much** data may be processed **as is necessary** for the defined purpose.
- ... the data must always be **updated** to a **new** and **correct** state.
- ... the storage of data must be **limited**. We may store data only then and only as long as it is necessary for the defined purpose.
- ... during the processing of the data an adequate **security** of the personal data must be guaranteed.

# GDPR - Data Subject Rights

## 1 Right of access

1) The right to know whether data concerning him or her are being processed and 2) if so, access to it with loads of additional stipulations (GDPR Article 15).

## 2 Right to rectification

When personal data are inaccurate, then controllers need to correct them (GDPR Article 16).

## 3 Right to erasure or right to be forgotten

The right to ask the data controller to delete the data (GDPR Article 17).

## 4 Right to restriction of processing

The right of the natural person under the scope of the GDPR, to limit the processing of his/her personal data (GDPR Article 18).

## 5 Right to be informed

The right to be informed of how the relevant data was and will be processed (GDPR Article 19).

## 6 Right to data portability

The right to receive the data in a common and machine-readable format from the controller (GDPR Article 20).

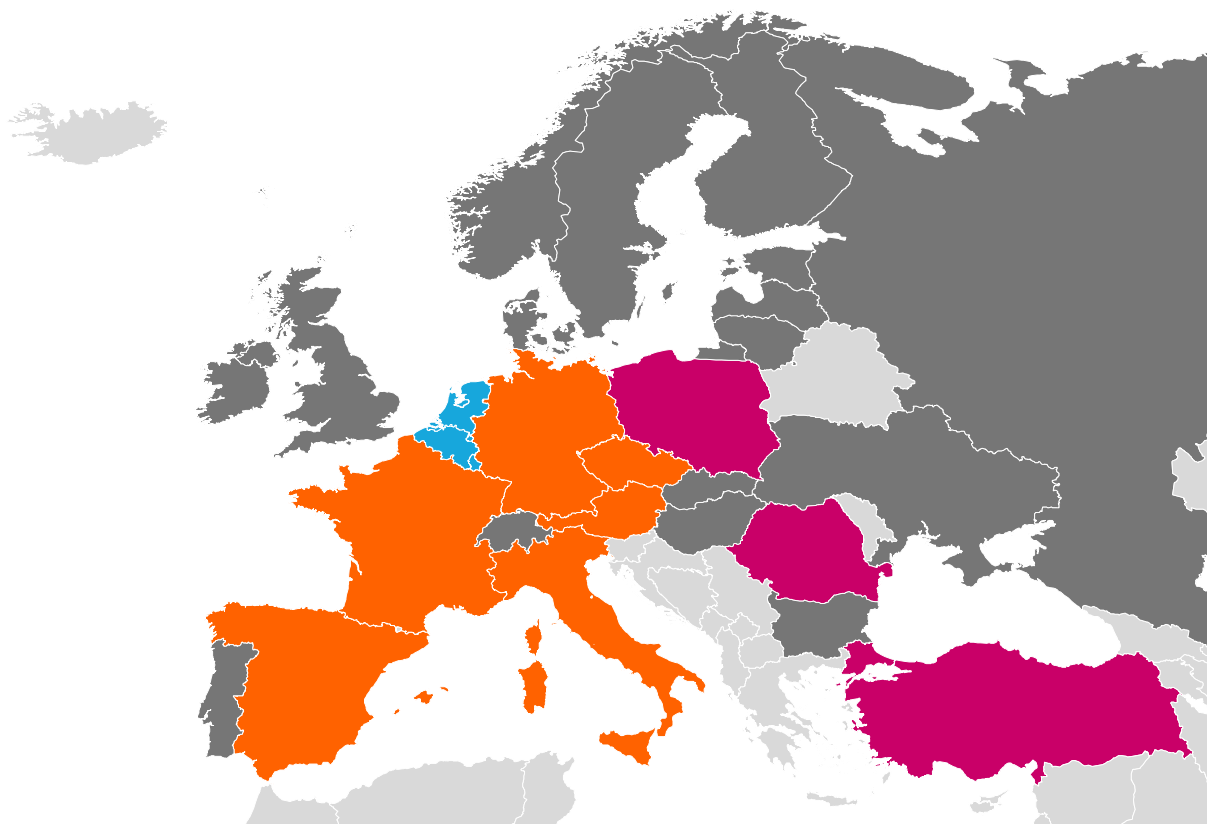
## 7 Right to object

The right to object at any time to the processing of the data concerned (GDPR Article 21).

# About ING's Business Model

## ING in Europe and worldwide

### ING in Europe



Market leaders

Growth Markets

Challengers

Wholesale Banking only

### ING worldwide



More than **38** million private customers, business and institutional clients



More than **40** countries in Europe, North America, South America, Asia and Australia



More than **51,000** employees

# About ING's Business Model

## Our Goal: to be the leading Digital Bank in Germany



1. We want to be the primary financial partner for our customers.

2. We want to be digital leader of the finance sector.



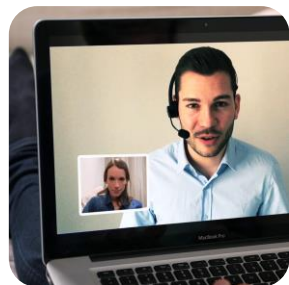
Many customers carry the branch of the future anytime and anywhere in their pockets: **the smartphone**



# About ING's Business Model

## Digital services for easy and stress-free banking

### Video identification



Convenient identification from home

### Photo transfer



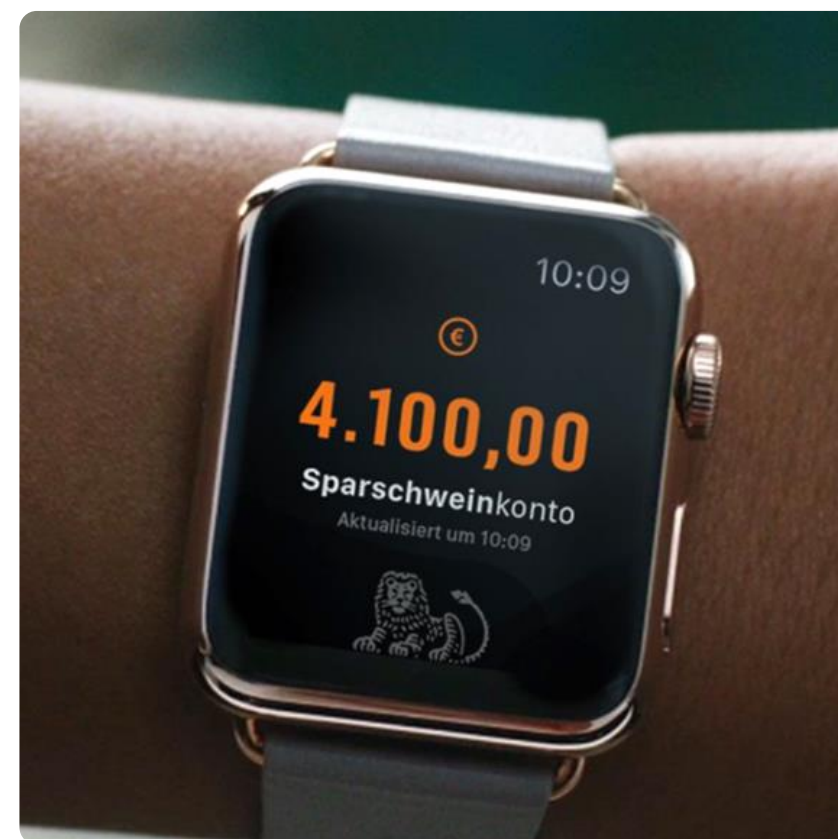
Capture data from a printed invoice

### Fingerprint



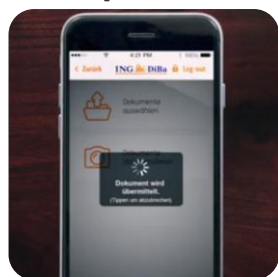
Fingerprint instead of TAN

### Banking to go App



Check balance and recent transactions on mobile devices

### Document upload



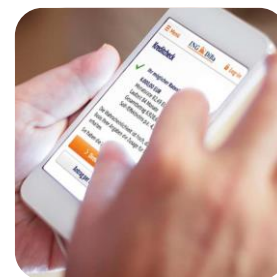
Photograph and send documents to ING

### Account switching service



Payment partners automatically get informed about new account details

### Mobile credit check



Mobile check for credit requests

# Discussion

What do you expect  
from a bank like ING?

# Discussion

Which expectations has the ING at itself in the context of GDPR?

Protection of data of affected persons (employees, clients, suppliers, visitors, etc.)

Respectful approach to the wishes of those affected

Implementation of processes to ensure that compliance with all rules is ensured and that data protection can be guaranteed

# Discussion

How is ING doing justice to this?

By recognizing importance and doing everything to ensure that our customers and employees are doing well.

By keeping people aware of GDPR by trainings sessions to employees & diverse awareness campaigns

By establishing intelligent and efficient processes

By hiring specialists and motivated people to protect personal data



# Use Cases

## Data Breach

ING is required to report data protection violations to the supervisory authority immediately, at the latest within 72 hours of becoming aware of the incident.



1. Develop what the GDPR demands if such an incident happens. Summarize what the law describes.
2. Think about what a potential data incident might be. Describe a scenario.
3. Imagine that you are the data protection officer at ING. Please develop a strategy to manage the incident. The following questions might help you:
  - a. Which process steps do you need to introduce in order to manage this data incident?
  - b. Do you need information from other departments? What information do you need?
  - c. Do you have to inform the affected person? Do you have to inform the supervisory authority in this case?
  - d. What challenges do you face?

# Use Cases

## Right of Access

The right of access gives individuals the right to obtain a copy of their personal data as well as other supplementary information. It helps individuals to understand how and why their data is processed.



1. Identify what the GDPR demands. Summarize what the law describes.
2. Imagine that one person wants to claim his/her right of access and contacts the ING. Describe the scenario.
3. Imagine that you are the data protection officer at ING. Please develop a strategy to manage the request of the person. The following questions might help you:
  - a. Which process steps do you need to introduce in order to be able to answer to the request of the affected person?
  - b. Do you need information from other departments? Which information do you need?
  - c. How many time do you have to respond to the request?
  - d. What challenges do you face?

# Use Cases

## Right to be forgotten

The GDPR introduces a right for individuals to have personal data erased. The right to erasure is also known as 'the right to be forgotten'. Individuals can make a request for erasure verbally or in writing.



1. Develop what the GDPR demands. Summarize what the law describes.
2. Think about a scenario where a person wants to make use of his/her right to be forgotten. Describe the scenario.
3. Imagine that you are the data protection officer at ING. Please develop a strategy to manage the request. The following questions might help you:
  - a. Which process steps do you need to introduce in order to be able to react according to the law?
  - b. Do you need information from other departments? What information do you need in this case?
  - c. What do you have to consider if you want to delete data?
  - d. What challenges do you face?
  - e. How many time do you have to respond to the request?
  - f. How long can data be kept under GDPR?

# Thank you!



**Leila Harborth**

Data Management and Protection

ING Germany                      Telefon +49 / 69 / 27 222699 48  
Theodor-Heuss-Allee 2            Mobil +49 / 172 / 382 89 28  
D-60486 Frankfurt am Main    Leila.Harborth@ing.de

[www.ing.de](http://www.ing.de)



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