

## Respecting privacy and protecting personal data

### Introduction

**Triodos Bank and Triodos Investment Management (referred to as Triodos Bank in this document) finance and invest in companies, institutions and projects that add cultural value and benefit people and the environment, with the support of depositors and investors who want to encourage socially responsible business and a sustainable society.**

Triodos Bank's mission is:

- to help create a society that promotes people's quality of life and that has human dignity at its core.
- to enable individuals, institutions and businesses to use money more consciously in ways that benefit people and the environment and promote sustainable development.
- to offer clients sustainable financial products and high-quality services.

### Ambition

Triodos Bank wants to promote human dignity, environmental conservation and focus on people's quality of life in general. Key to this is a genuinely responsible approach to business, transparency and using money consciously. Triodos Bank puts sustainable banking into practice. First and foremost, this means offering products and services that directly promote sustainability. Money plays a leading role in this because using money consciously means investing in a sustainable economy. This in turn helps to create a society that enjoys better quality of life.

### Data, people and society

Through everyday choices about money, Triodos Bank continuously invests in a fairer, greener and more human economy and society. Money can help change the world; data can as well. Data can be used to better understand our world and each other. This understanding can be used to prevent waste, to reduce costs and create societal benefits.

For instance, by analysing sales data, weather forecasts and seasonal trends, manufacturers can determine an optimum inventory level, avoiding overstock and thereby reducing the effects of food wastage. Or data related to a person (personal data)

may be used for personalised medicine, providing more effective and targeted treatment of diseases with less side effects and reduced costs.

At the same time, Triodos Bank must also be cognisant of the fact that while the use of data may have positive impact on our lives, misuse or abuse may also negatively impact us.

### Data at Triodos Bank

Data helps Triodos Bank to become a better bank by improving service offerings and operations. Data assists Triodos Bank to discover or predict risks, (prevent) fraud and enhance the reliability of our services. For example, by analysing statistical data related to our financial service execution Triodos Bank supports the objectivity for fair and founded decision-making. These insights help to improve products and tailor services to improve people's quality of life. Triodos Bank is aware of the fact that the (personal) data it processes can be sensitive and can impact the privacy of our clients and employees. As such, Triodos Bank is committed to respecting privacy and ensuring data protection.

### Position on the use of data, privacy and data protection

When it comes to privacy and data protection, Triodos Bank believes:

- that data is an abstraction, reduction of reality and an interpretation of behaviour. The world cannot be captured in abstractions. People should not be reduced to the data collected about them. Data refers to the past and are not always a prediction for the future.
- that every individual has the right to be different in different situations, in other roles or at different times.
- that each individual should keep the power and control over her or his own life, including personal data. This calls for freedom of choice, fairness and transparency on data collection, processing and usage.
- That data are valuable, therefore Triodos Bank has an obligation to keep the data when holding them accurate, secure and confidential.

## Guiding principles

Responsible use of personal data in line with the above beliefs, requires conscious decision-making. In our decision-making on the use of personal data Triodos Bank is therefore always guided by the following principles

### Legal and regulatory compliance

In line with applicable laws and regulations (e.g. GDPR as a whole, and specifically art 5 and 6), processing of personal data must be fair, legitimate and transparent. Furthermore, data needs to be kept secure and accurate and the rights of the data subjects needs to be respected (access, portability, deletion etc.). Finally, Triodos Bank is responsible for its use of personal data.

### Positive Sum

The interests of using personal data and respect for privacy should not be mutually exclusive. We strive to optimise both values. Benefits should also go to the individual and society, rather than just the bank.

### Respect for human dignity and individuality

Triodos Bank values and considers the human scale, also when it comes to respecting privacy and data protection. An individual is not to be solely judged upon his/her data shadow.

### Transparency and openness

Triodos Bank is open about its use of personal data. Activities, products and transactions of Triodos Bank are reasonably explainable to our clients, employees, data protection authorities and the general public (e.g. GDPR art 12, 13 and 14). Triodos Bank clearly, transparently and actively communicates its position on privacy and data protection. This includes being present in the public arena on this subject. Furthermore, Triodos Bank provides actionable insight into the use and protection of personal data to our clients to avoid surprises.

### Personal autonomy

Triodos Bank provides meaningful choice. Where processing of personal data is based on consent, the choice is free, informed, specific and an unambiguous indication of wishes.

Triodos Bank facilitates the exercise of an individual's rights and preferences when it comes to personal data (e.g. GDPR art 15) and provide users with control over their personal data through measures such as privacy settings. (e.g. GDPR art 12 and 25).

### Context sensitivity.

Privacy and personal data are context specific. Data used outside of the context in which they were collected or shared can lead to surprises and even harm. Triodos Bank is mindful of the specific context in which data were collected and will process the data only for these and compatible purposes (e.g. GDPR art 5.1.b and 6.2). Context specificity guides our thinking on the (future) use of data.

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