



Zoomit Code Of Conduct

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1. Objective

Isabel S.A.'s objective with this Code Of Conduct is, on the one hand, to ensure that all parties concerned are able to use Zoomit in a correct, transparent, secure and confident manner, and, on the other, to counter any possible misuse.

Isabel would furthermore like to offer the parties the possibility of reporting any infringements to this code so that the necessary steps could be taken to preclude them.

2. Field of Application

The use of Zoomit is governed by the rules laid down in this Code Of Conduct. It forms part of contractual commitments entered into between all the parties concerned.

Its content applies for:

- Banks: they incorporate Zoomit within their Internet banking solutions.
- Document Issuers: they forward electronic documents in Zoomit.
- Document Recipients: they use Zoomit via their Internet banking solutions.

3. What Is Zoomit And Who/Which Are The Parties Concerned?

Zoomit is a product developed by the Isabel Company that has been incorporated by certain banks into their respective Internet banking application and is therefore offered to their users (companies, self-employed, professions and consumers).

Via Zoomit, certain documents (invoices, credit notes, pay slips and so on) that relate to financial transactions can be viewed and paid in a total security. These documents are made available via Zoomit by issuers that have user agreements. Companies, institutions and authorities can give access to electronic documents in their Internet banking solutions via Zoomit. In this way, issuers and users alike can save a considerable amount of time and money. Moreover, the documents are easily available for the users and the amount of paper exchanged is reduced.

For direct debit payments, access is granted via Zoomit to the invoice that relates to the automated payment.

For all other invoices, Internet banking users can, if they so wish, pay directly via their Internet banking programs.

To be able to offer the Zoomit service, several parties are working together:

- Isabel S.A: it has developed the Zoomit service and makes it available to all the parties concerned.
- Banks: they incorporate Zoomit within their Internet banking solutions.
- Document Issuers: they forward electronic documents in Zoomit.
- Document Recipients: they use Zoomit via their Internet banking solutions.

4. Organisation, Control And Additional Information

Isabel has not only drafted the Zoomit Code of Conduct but also sees that it is duly observed. For further information on Isabel's Zoomit Code of Conduct, please refer to:

→ Isabel S.A. - Zoomit – Code of Conduct
13-15, Boulevard de l'Impératrice
1000 Brussels
E-mail: ZOOMIT-Privacy@isabel.eu
Websites: www.zoomit.eu – www.isabel.eu

If you have any questions relating to the way in which your bank or an issuer protects matters that involve your privacy, you can of course always refer to them directly.

5. Security

Zoomit users must be able to display and process their electronic documents in a safe and risk-free manner. The totally secure and controlled environment of their Internet banking applications guarantees this.

They receive access to their Internet banking applications only by adhering to their banks' strict identification procedures.

Via Zoomit, users can, directly but only by adhering to their banks' strict identification procedures, view and claim documents from the issuer.

6. Advertising

The electronic provision of documents via Zoomit at no time gives the issuer the right to issue documents via this channel other than those that are covered by an agreement.

If a document issuer would like to do that, permission must always be requested from the user, from Zoomit and from the bank that has incorporated Zoomit into its Internet banking application. In any event, the user has the right to refuse unsolicited information via Zoomit at all times.

7. Respect For Privacy

The User's Free Choice

It is the user who chooses whether or not he or she would like use Zoomit, and if so, how and when. This is an absolute guarantee that his or her privacy will be respected.

The protection of Zoomit users' right to privacy is a matter of priority. This is why Isabel pays the greatest attention to the application of the legal provisions in this regard. Zoomit furthermore incorporates specific security mechanisms and certain organisational procedures have been put in place. The parties concerned (inter alia, banks and document issuers) also share these concerns and are contractually bound to observe these rules.

The documents will be stored by the issuer and by a third party that has been hired for that purpose. The documents are neither preserved nor reworked by Isabel in Zoomit, nor by the bank. The user can display and save the documents in his or her computer.

Isabel undertakes, completely and at all times, to comply with the rules in force with regard to the respect and protection of the Zoomit user's privacy. And for whatever purpose it may serve, Isabel will ask for advice on the subject, if necessary, from the Belgian Protection of Privacy Commission. The latter is the official body in charge of controlling the legislation in this field.

How Does The Zoomit Application Manage To Connect A Given Document To A Bank Account Transaction?

Zoomit records the data relating to the electronic documents, but does not save the documents themselves, which are however kept by the issuer. For each electronic document, Zoomit files only the site of origin (as specified by the issuer), the issuer's and the recipient's identity and a reference number relating to the electronic document. In addition, Zoomit retains the times when and by whom the electronic documents have been consulted.

The data kept by the bank is limited to a list that indicates the financial transactions to which the documents relate. Finally, it is important to point out that the bank is entirely unaware of the electronic documents' actual location.

The Bank Is Not Entitled To See User-Oriented Documents

The documents can be consulted via Zoomit, but cannot be viewed by the bank or by Isabel. Only the user for whom or which the document is available will be able to see it.

Can Users Give Access To Their Documents To Others?

In theory, only the recipients specified by the issuer have access to the documents that are sent to them. Extensive security measures have been taken to ensure that documents can be issued exclusively to the person indicated by the issuer and therefore that third parties are unable to access documents that are not intended for them.

Users can however explicitly allow other people who also have access to their bank accounts to consult an electronic document. They can withdraw this right at any time.

What Other Data Security Steps Have Been Taken?

The issuers, the banks and Isabel pay particular attention to the security and protection of personal data. They undertake to comply with the legally imposed privacy protection rules in every detail. The way in which these parties respect your rights is always described in the privacy protection policies peculiar to the parties concerned.

All issuer, bank and Isabel computers are also meticulously secured against third-party access, and only carefully selected members of staff can access the recorded data.

It is in addition important to underline the fact that regular, rigorous safeguards (back-ups) are made of the electronic documents and of the data kept by the banks in the Zoomit application.

This enables the data to be protected against natural disasters, power cuts, computer breakdowns and other catastrophes.

To guarantee the security of the processing, Isabel moreover applies what are known as "Reference Measures For Personal Data Processing Security" for Zoomit. The Belgian Protection of Privacy Commission has formulated these measures.

8. Transparency

Zoomit users have, at all times, access to all documents that are electronically presented to them.

Electronic document issuers guarantee that all the obligatory legal information specific to the document is reinforced and provide users with uninterrupted access to that information.

Internet banking applications users are completely free to use Zoomit or not for accessing their electronic documents.

The use of Zoomit in no way means that users lose their right to receive electronic documents in another form.

Electronic document issuers always give users a free choice between all the possibilities that currently exist for receiving the document concerned.

9. Control, Complaints And Sanctions

All the parties concerned, and the users of Zoomit in the first place, can check, directly or indirectly, whether or not this Code Of Conduct is being correctly observed. Any noted infringement does not therefore have to be directly linked to the proper use of Zoomit. Any exemption can be notified and any complaint for can be lodged via e-mail or in writing at the following address:

→ Isabel NV– Zoomit – Code of Conduct
13-15, Boulevard de l'Impératrice
1000 Brussels
E-mail: ZOOMIT-Privacy@isabel.eu
Websites: www.zoomit.eu – www.isabel.eu

Isabel undertakes to confirm the due reception of a complaint and/or a report of an infringement to this Code Of Conduct, to formulate, within reasonable time, a reasoned reply; and to keep the sender informed of the actions taken or to be taken.

If Isabel S.A. cannot give any satisfactory answer or solution, the infringement report or the complaint will be passed to Febelfin, the Belgian Financial Sector Federation

For any noted infringement of this Code Of Conduct, Isabel S.A. will take the necessary steps for putting an end thereto and for avoiding such deviations in the future. If necessary, Isabel can even prohibit the contravening party from accessing Zoomit.