



**Last updated: 22 May 2018**

**LeasePlan**  
**Global Privacy Statement**

LeasePlan is committed to protecting the privacy of the personal information collected and processed by us. Compliant privacy and data security practices have therefore become integral components of LeasePlan's Services, corporate governance, accountability and risk management. We therefore process only such personal information as is necessary for the provision of the relevant LeasePlan Services ('Services').

**LeasePlan Privacy Pledges**

Regardless of when and how we process your personal data:

- Transparent:** We help you understand how your data is collected and used
- Privacy as starting point:** We ensure that our services are privacy friendly
- Control:** We provide you with an easy manner to access, correct or delete your data
- Safe with LeasePlan:** We secure your data as best as we can and personal data is only shared with third parties when necessary and under appropriate conditions.
- Innovating and responsive:** We keep thinking of ways how to improve our services and your privacy and are open for all suggestions and complaints

This privacy statement informs you of our privacy practices which we apply globally.

Please read this Privacy Statement carefully so that you understand how we collect and use your personal data.

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## 1. Scope of this Privacy Statement

This Global Privacy Statement (“**Statement**”) describes our practices in connection with personal information that we collect from:

- I. Website visitors/users (“**Website Visitors**”);
- II. Business Clients (“**Clients**”);
- III. Clients’ employees/drivers (“**Drivers**”).
- IV. Private lease clients (including one man businesses) (“**Private Lease Clients**”)
- V. Private buyers of used vehicles (“**Buyers**”)
- VI. Professional buyers of used vehicles (“**Traders**”).

(Individually and collectively also referred to as “**you**”)

We collect and use your personal information through our various vehicle and fleet leasing, management, and driver mobility services, as further described in Section 1 (“**Services**”).

Please note that this Statement does not apply to the following affiliates and/or services:

- Mobility Mixx B.V.;
- Euro Insurances DAC trading as LeasePlan Insurance or other insurance-related activities;
- and
- LeasePlan Bank in The Netherlands or in Germany.

These services are governed by separate privacy statements.

Please also note that any processing of your personal information via our telematics services will take place in accordance with the applicable Telematics Privacy Statement.

### Responsibilities of Business Clients

Insofar as Clients (employers) have access to personal information, the Client (employer) is the data controller responsible for the processing and use thereof. This Statement does not apply to the processing and use of personal data by Clients (employers).

## 2. Who we are

LeasePlan UK Limited is the company responsible for the processing of your personal information (data controller):

165 Bath Road, Slough SL1 4AA

Sometimes LeasePlan Corporation N.V. and LeasePlan Global B.V. are joint controller:

Address: Gustav Mahlerlaan 360, 1082 ME Amsterdam, the Netherlands,

The relevant local LeasePlan entity and LeasePlan Corporation N.V. and LeasePlan Global B.V. are jointly referred to as “LeasePlan” and “we”.

## 3. How we collect your data

We and our service providers collect personal information in a variety of ways, including:

- **Through the Services**

Most of the data we process are in relation to the vehicle management services we provide to you as the driver and to your employer if you have a company car. This usually starts with the registration of your leased vehicle (in some circumstances we may do some preliminary credit



checks before this), and continues when we communicate with you about our services, e.g. to arrange for periodic maintenance and repairs. We may also process your data when your vehicle inadvertently is involved in an accident, to ensure that we restore mobility and handle any damage, or where we are the recipient of traffic fines in relation to your leased vehicle. Next to our core-leasing activities, we also provide a number of other related services, such as e-mobility services, fuel card services, car rental services, and roadside assistance. Another service we provide relates to car remarketing, Carnext, sales of used LeasePlan vehicles.

• **Offline**

We collect personal information from you offline, e.g., when you visit our Carnext experience stores, place an order over the phone, or contact customer service.

• **From Other Sources**

We receive your personal information from other sources, for example:

- Drivers' employers, if you have a company car
- The relevant authority (e.g. police) where we are the recipient of traffic fines in relation to your leased vehicle
- From our independent Service Partners who assist us in providing our leasing and other services to you, including car dealerships, car maintenance providers, body repair shops
- publicly available databases, credit reference agencies and other sources
- joint marketing partners, when they share the information with us;

If you connect your social media account to your Services account, or where you share information from our websites to your social media platforms, you will share certain personal information from your social media account with us, for example, your name, email address, photo, list of social media contacts, and any other information that may be or you make accessible to us when you connect your social media account to your Services account.

We need to collect personal information in order to provide the requested Services to you. If you do not provide the information requested, we may not be able to provide the Services. If you disclose any personal information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Statement.

**Monitoring of communications**

Subject to applicable laws, we will monitor and record calls, email, text messages and other communications we have with you. We will do this for compliance with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures, and for quality control and staff training purposes.

For example, where we are required by a regulator to record certain telephone lines (as relevant) we will do so. In addition, where appropriate and having regard to applicable data protection law our monitoring will be to check for inappropriate content in communications. In very limited and controlled circumstances we may conduct short term carefully controlled monitoring of your activities where this is necessary for our legitimate interests or to comply with a legal obligation. We may do this for instance where we have reason to believe that fraud or other crime is being committed, where offences are suspected and where the monitoring is proportionate to the type of the disciplinary offence, or where we suspect non-compliance with anti-money laundering regulations to which we are subject. In particular, telephone calls may be recorded for these purposes.

**4. For which purposes we use your data**

**4.1 DATA PERTAINING TO WEBSITE VISITORS.**

**4.1.1 WEBSITES.**

4.1.1.a To communicate with you.

- ⇒ What does this purpose entail?  
We collect your information when you contact us via one of our online contact forms, for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for our Services. This processing is done for the performance of an agreement that you have with us or with your consent.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect your full name, gender, title, contact details (including your email address, telephone number, name of your company) and any other information that you provide to us in the open field entry of the contact form, where you can, for example, pose your question, describe your suggestion, make a compliment or share a complaint.
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

4.1.1.b For surveys or other marketing communication.

- ⇒ What does this purpose entail?  
We process your personal information when we send you periodic surveys to request your feedback on our Services and other services performed on the vehicle, for which we have legitimate interest to process these data. With your consent or where you have provided your business contact information and we have a legitimate interest, we may send you marketing communication, to keep you updated on events, special offers, possibilities and current and future products and services of LeasePlan. When we contact you in regard of surveys or marketing communication, we will do so either by email, phone, or by postal newsletters/brochures/magazines (postal mailings). If you would no longer like to receive surveys or marketing communication from us, please contact us via the contact form. Based on your visit to a website of LeasePlan, we can show you personalized advertisements outside the LeasePlan website. To understand what is relevant to you, we can use manual and automatic tools to analyze your personal data.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we process your name, your address, your email address and topics you may be interested in (as may be indicated by you on our website).
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

**4.1.2 SOCIAL MEDIA.**

4.1.2.a To facilitate social sharing functionality.

- ⇒ What does this purpose entail?  
Our websites may contain various social media sharing functionalities, such as Facebook, Twitter or LinkedIn buttons, which -with your consent- you may use to share information provided on our websites with the social media of your choosing. Our websites may also contain links to our own social media pages, such as our LeasePlan Facebook or LinkedIn pages or our Twitter feed, which you may choose to use to post feedback.

Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as Facebook, Apple, Twitter, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any personal information you disclose to other organizations through or in connection with our social media functionalities.

- ⇒ Which personal information do we process for this purpose?  
For this purpose we process your name, email address, IP-address, photo, list of social media contacts and any other information that may be accessible to us when using social media functionalities.
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

### **4.1.3 COOKIES AND SIMILAR TECHNOLOGIES.**

Any processing of your personal information via cookies will take place in accordance with our Cookie Statement.

### **4.1.4 LEASEPLAN BUSINESS PURPOSES.**

#### 4.1.4.a Management reporting.

- ⇒ What does this purpose entail?  
We process personal information for various LeasePlan business-related purposes for which we have a legitimate interest to process these data, such as data analysis, audits, developing new products, enhancing, improving or modifying our websites and Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyze data that we collect when using our digital media and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

- ⇒ Which personal information do we process for this purpose?  
For this purpose we may process your name, your email address, your IP address, gender, date of birth, place of residence, digits of your postal code and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

#### 4.1.4.b Compliance with laws and legal obligations and protection of LeasePlan assets and interests.

- ⇒ What does this purpose entail?  
To comply with a legal obligation or where we have a legitimate interest we will process your personal information as appropriate or necessary (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence, money laundering, financing of terrorism and other crimes); (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions and other applicable policies; (e) to protect our operations; (f) to protect our rights, privacy, safety or property, and/or that of yours or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we process your name, your contact information, your correspondence with LeasePlan, your use of any of our Services and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

- ⇒ With whom do we share your personal information?  
Only if we are required to do so by law or sectorial recommendation to which LeasePlan is subject, your personal information will be provided to supervisory agencies, fiscal authorities and investigative agencies. See also section 'Sharing data with third parties'.

## **4.2 DATA PERTAINING TO CLIENTS AND PROSPECTIVE CLIENTS.**

### **4.2.1 CLIENT ACCOUNT MANAGEMENT.**

4.2.1.a To enter into, provide, manage and administer the Client account.

- ⇒ What does this purpose entail?  
We collect your information to enable us to enter into a Client relationship with you, handle day-to-day management and administration of the Client accounts, such as maintaining contracts, and keep you informed of all important developments concerning the Services and other information which is relevant for the Client contract and account. This processing is done based on our legitimate interest (the performance of the lease agreement that we have with the Client) and to adhere to guidance and best practice issued by regulators to which the relevant local LeasePlan office is subject or based on a legal obligation.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we may process business contact details and log-in details to our Client online accounts.
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

4.2.1.b To communicate with you.

- ⇒ What does this purpose entail?  
You can contact us by various means (such as email or telephone, or via our website). In this case we will use your personal information to answer your question/request. We can also contact you, for example, regarding day-to-day management and administration of your Client account. This processing is done based on our legitimate interest (the performance of the lease agreement that we have with the Client) or with your consent.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we may process your name, your business contact details, your correspondence with LeasePlan pertaining to your question/request and all other personal information you provide to us and/or which is necessary to appropriately respond to you.
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

4.2.1.c For surveys or other (marketing) communication.

- ⇒ What does this purpose entail?  
We will process your personal information to send you surveys, for which we have legitimate interest to process these data. With your consent (where this is required) or where you have provided your business contact details and we have a legitimate interest (including where you are a prospective Client) we may send other communications, for example, to keep you updated on events, special offers, possibilities and current and future products and services of LeasePlan. We will send you such surveys in the form of either a periodic email or an email to request your feedback on our Services and other services performed on the vehicle. We may also send you postal newsletters/brochures/magazines (postal mailings). If you would no longer like to receive surveys or marketing communication from us, please contact us using the contact form. This would mean that you have withdrawn your consent and we cannot contact you again for these reasons unless you resubscribe and give us a new consent.



⇒ Which personal information do we process for this purpose?  
For this purpose we may process your name and your business contact details.

⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

#### **4.2.2 LEASEPLAN PREMISES.**

##### 4.2.2.a Access to and security control of LeasePlan premises.

⇒ What does this purpose entail?  
We may process your personal information when you visit us on our premises for the purpose of ensuring appropriate access controls and security, for which we have legitimate interest (safety and security of our assets).

⇒ Which personal information do we process for this purpose?  
For this purpose we may process your name, your contact information and the person you are visiting.

⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

#### **4.2.3 CLIENT REPORTING.**

##### 4.2.3.a FleetReporting and International FleetReporting.

⇒ What does this purpose entail?  
We provide online reporting tools "FleetReporting" and "International FleetReporting". Clients' contact persons can log onto these tools to review the status of their fleet, and to use other fleet reporting functionalities, such as dashboard reporting, trend analysis reporting, vehicle mileage and end of lease term. This processing is done based on our legitimate interest (the performance of the lease agreement that we have with the Client)

⇒ Which personal information do we process for this purpose?  
For this purpose we collect contact details and job function (e.g., (International) Fleet Manager) of Client's contact person, and login details (e.g., username and password).

⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

#### **4.2.4 LEASEPLAN BUSINESS PURPOSES.**

##### 4.2.4.a Compliance with laws and legal obligations and protection of LeasePlan assets and interests.

⇒ What does this purpose entail?  
To comply with a legal obligation or where we have a legitimate interest we will process your personal information as appropriate or necessary (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence, money laundering, financing of terrorism and other crimes); (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions and other applicable policies; (e) to protect our operations; (f) to protect our rights, privacy, safety or property, and/or that of yours or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

⇒ Which personal information do we process for this purpose?  
For this purpose we process the name, contact information, the date, place and country of birth of the ultimate beneficial owner of the counterparty that LeasePlan want to do

business with; we may also process the name, address and the date, place and country of birth of the person(s) who represent the company towards LeasePlan; your correspondence with LeasePlan, your use of Services and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph.

- ⇒ With whom do we share your personal information?  
Only if we are required to do so by law or sectorial recommendation to which LeasePlan is subject, your personal information will be provided to supervisory agencies, fiscal authorities and investigative agencies. See also section 'Sharing data with third parties'.

## 4.3 DATA PERTAINING TO DRIVERS (Employees of our Clients).

### 4.3.1 DRIVER CONTACT.

#### 4.3.1.a To communicate with you.

- ⇒ What does this purpose entail?  
You can contact us by various means (such as email or telephone, or via our website). In this case we will use your personal information to answer your question/request. We can also contact you in relation to your vehicle or other relevant driver-related issues. This processing is done based on our legitimate interest (the performance of the lease agreement that we have with your employer) or with your consent where this is required.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we process your name, your contact information, your correspondence with LeasePlan pertaining to your question/request and all other personal information you provide to us and/or which is necessary to appropriately respond to you, including your license plate number.
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

#### 4.3.1.b For surveys or other (marketing) communication.

- ⇒ What does this purpose entail?  
We process your personal information when we send you periodic surveys to request your feedback on our Services and other services performed on the vehicle, for which we have legitimate interest to process these data. With your consent (where this is required) or where you have provided your business contact details and we have a legitimate interest we may send you marketing communication, to keep you updated on events, special offers, possibilities and current and future products and services of LeasePlan. When we contact you in regard of surveys or marketing communication, we will do so either by email or by postal newsletters/brochures/magazines (postal mailings). If you would no longer like to receive marketing communication from us, please contact us via the contact form. This would mean that you have withdrawn your consent and we cannot contact you again for these reasons unless you resubscribe and give us a new consent.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we process your name, your address, your email address, your license plate number and your interests (as indicated by you).
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

#### 4.3.1.c Portals and apps

- ⇒ What does this purpose entail?  
We will (soon) offer you online portals or apps. Via these portals or apps you can find practical information on your lease car, your contact information and other personal data, report changes thereto, report damage to your vehicle, record appointments for repairs, maintenance or tire change, contact our customer service, consult and pay fines. This processing is done based on our legitimate interest (the performance of the lease agreement that we have with your employer) or with your consent.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect your name and email address to send you a temporary password, which you will need to use the platform and apps.
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

### 4.3.2 VEHICLE SERVICES.

#### 4.3.2.a Management of the vehicle.

- ⇒ What does this purpose entail?  
We process your information in relation to administering your use of the vehicle and to handle the day-to-day management of the vehicle, for which we have a legitimate interest (the performance of the lease agreement that we have with your employer).
- ⇒ Which personal information do we process for this purpose?  
For this purpose we process your name, address, (company) email address, lease category, license plate number, make and model, service history and operational contact with you. In addition, you may provide certain information pertaining to vehicle management to us through the LeasePlan portal, or when you call LeasePlan.
- ⇒ With whom do we share your personal information?  
We share information pertaining to management of the vehicle with our Clients (your employer). See also section 'Sharing data with third parties'.

#### 4.3.2.b Repair, maintenance and tires.

- ⇒ What does this purpose entail?  
We process your information in relation to providing (scheduled) repair and maintenance Services and tyres Services for your vehicle, for which we have a legitimate interest (the performance of the lease agreement that we have with your employer).
- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect your name, address, (company) email address, license plate number, make and model, service history and operational contact with you. In addition, you may provide certain information to us through the LeasePlan portal (e.g., your phone number to make an appointment for maintenance of the car), or when you call LeasePlan.
- ⇒ With whom do we share your personal information?  
We share information with our Clients (your employer) and with third parties performing maintenance/repair on the vehicle or changing or replacing tyres, such as dealers/garages, body repair shops or car fitters. See also section 'Sharing data with third parties'.

#### 4.3.2.c Accident management.

- ⇒ What does this purpose entail?

We process your information by recording and administering accidents that you and/or your vehicle may have been involved in, to restore mobility and handle damage. We will do so by (i) giving you an opportunity to report accidents as they happen at our Customer Call Center, (ii) providing, where applicable, roadside assistance and/or a replacement vehicle and (iii) arranging repair and other necessary follow-up. This processing is done based on our legitimate interest (the performance of the lease agreement that we have with your employer). We may also use this information for assessing damage repairs under our damage handling and risk retention policies, for which we have a legitimate interest to process these data.

We may also be required to process special category data. These may include (i) data relating to traffic or driving offences and our lawful reason for processing these would be that it is in the substantial public interest and that it is necessary for establishing or defence to legal claims if necessary or (ii) medical reports or similar health related information and if we do process these we will obtain your specific consent to do so and to share these with any necessary third parties.

⇒ Which personal information do we process for this purpose?

For this purpose we collect the following personal information:

- Ourselves: license plate number, make and model, service history and operational contact with you.
- From you: your name, contact details, vehicle details, accident details, damage details, photos of the incident, date of birth, number of passengers in the vehicle, information of witnesses to the accident (if applicable) and any other information you choose to provide to us in the context of the accident (including any information pertaining to possible injuries).
- From third parties, such as individuals involved in the accident or insurance companies: information of third parties involved in the accident/incident (such as the identity of your passengers, driver and passengers of third-party vehicles, and other third parties involved), information of other third parties (such as witnesses, investigating police officers and others) insurance information, information about the incident and third-party claims.
- From authorities (such as police): your name, address, license plate number, information regarding the accident, police reports and witness statements.

⇒ With whom do we share your personal information?

We share this information with our Client (your employer) through our tool (International) FleetReporting. We may also share certain information with dealers/garages, body repair shops, car fitters, car insurance companies (which may be both affiliated and third-party car insurance companies) and professional experts employed on our behalf or on behalf of third parties (such as lawyers, medical experts, investigators, etc.) for the purpose of damage or claim resolution. See also section 'Sharing data with third parties'.

#### 4.3.2.d Traffic and parking fines management.

⇒ What does this purpose entail?

The following may depend on the country where Drivers may have committed traffic and/or parking violations: As the registered owner of the vehicles, traffic and/or parking fines incurred by Drivers of the vehicles may be addressed to LeasePlan by the authority that issued a specific traffic or parking fine (such as police or local municipality).

We process your personal information for the purpose of processing and managing the payment of the fine and, if applicable, obtaining reimbursement from our Client (your employer), for which we have a legitimate interest to process these data. We may also be required to process special category data. These may include data relating to traffic or driving offences and our lawful reason for processing these would be that it is in the substantial public interest and that it is necessary for establishing or defence to legal claims if necessary.

- ⇒ Which personal information do we process for this purpose?  
We process information that we receive from the competent authorities (such as police or local municipalities): your name, address and license plate number, the nature, place and time of the offense/incident committed by you and the imposed fines.
- ⇒ With whom do we share your personal information?  
LeasePlan may need to share this information with our Client (your employer) in certain situations, for example, when leased vehicles are used in carpools and LeasePlan does not know who the actual driver of a specific vehicle is. See also section 'Sharing data with third parties'.

#### 4.3.2.e Fuel card, e-Mobility card and tolls.

- ⇒ What does this purpose entail?  
Our Services include a fuel management program, which allows you to, for example, pay for your fuel at gas stations using a LeasePlan issued or managed payment mechanism. In case you have an Electric Vehicle, you may be provided with an e-Mobility card for charging your vehicle at charge points. This processing is done based on our legitimate interest (the performance of the lease agreement that we have with your employer).

We may further collect certain information to manage toll-related activities of a fleet.

- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect the following information: your name, email, fuel or e-Mobility card number, car license plate number, fuel information, mileage and related costs. In case of re-imburements we may also need to collect bank account information.

We may also collect toll-related information, such as information on location, time and costs.

- ⇒ With whom do we share your personal information?  
LeasePlan needs to share the information with the fuel card/ E-Charging solution/ payment company. Also our Clients (your employer) may have access to certain personal information made available by us on our Internet or e-Mobility portal or online reporting tool "(International) FleetReporting.". Clients can log in and review the status of their fleet (e.g., mileage), and use other fleet reporting functionalities (e.g., dashboard reporting on fuel consumption and fuel price and trend analysis reporting). See also section 'Sharing data with third parties'.

### 4.3.3 MOBILITY SERVICES.

#### 4.3.3.a Renting.

- ⇒ What does this purpose entail?  
We collect your personal information to provide our rental program services, so that you can, for example, reach LeasePlan's rental specialists through our Customer Contact Center, rent a vehicle from the most appropriate rental location or have a rental vehicle delivered to you. This processing is done based on our legitimate interest (the performance of the lease agreement that we have with your employer) or if applicable the agreement that you have with us.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect: your name, email, mobile phone number, car license plate number, related costs, delivery location, rental time and company contact person.
- ⇒ With whom do we share your personal information?  
We share your data with LeasePlan's (external) rental specialists. See also section 'Sharing data with third parties'.

#### 4.3.3.b Roadside assistance.

- ⇒ What does this purpose entail?  
When you experience a car malfunction, for example, a flat tyre or mechanical difficulties while on the road, LeasePlan is able to arrange roadside assistance, for which we work closely with contracted third parties. This processing is done based on our legitimate interest (the performance of the lease agreement that we have with your employer).
- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect the following information: your name, email, mobile phone number, license plate number and location of where assistance was needed and provided.
- ⇒ With whom do we share your personal information?  
We share your information with third parties providing on the road repair services, towing services or a replacement car. See also section 'Sharing data with third parties'.

#### 4.3.4 DRIVER SAFETY PROGRAM.

##### 4.3.4.a To prepare, manage and administer trainings.

- ⇒ What does this purpose entail?  
We provide various driver safety and risk management training programs in order to analyse and improve driving behavior, promote your company's proactive commitment to safety and good corporate citizenship, decrease accident rates, validate the effectiveness of your company's overall safety initiatives and identify communication and training opportunities. We engage third parties for administering and executing such safety programs, who will contact you to initiate a safety assessment and provide the actual training courses (either online or in a classroom setting). We receive back from these third parties your "driver risk index" (information about potential risks identified through questionnaire processes), trainings that have been recommended, signed up for and completed. This processing is done based on our legitimate interest (the performance of the lease agreement that we have with your employer).
- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect/process the following personal information:
  - Directly from Clients (your employer): your name, (company) email address and license plate number.
  - From third parties engaged by us: driver risk index, trainings recommended, trainings signed up for, and trainings completed.
- ⇒ With whom do we share your personal information?  
We share your information with third parties engaged by us to administer and execute the driver safety programs, as well as with our Clients (your employer). See also See also section 'Sharing data with third parties'.

#### 4.3.5 ONLINE PORTALS AND APPS.

##### 4.3.5.a Various portals and apps for drivers.

- ⇒ What does this purpose entail?  
Depending on the country you live in, we provide online portals and apps that have a number of functionalities. For example, through our portals and apps you can find practical information about your lease vehicle, change your name, contact details and other personal information, report damage to your vehicle, schedule appointments for repairs, maintenance or changing tyres through online appointment planners, contact our Driver Contact Centers, view and pay fines claim (fuel) expenses and -in case you have an electric vehicle- manage charging. We may also provide you with dashboard-type overview that can provide you insight into your use of the vehicle (such as your average fuel efficiency, your damages, etc.). This processing is done based on our legitimate



interest (the performance of the lease agreement that we have with your employer) or with your consent.

- ⇒ Which personal information do we process for this purpose?  
We receive your name and email address from your employer (our Client) to provide you with LeasePlan generated log-in data (username and temporary password) so that you can access our various online portals and apps.
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

#### 4.3.5.b (International) FleetReporting.

- ⇒ What does this purpose entail?  
(International) FleetReporting entails dashboard reporting on a country and/or international level to our Clients (your employer). (International) Fleet Reporting allows Clients for instance to access and evaluate the mileage or the remaining lease period of (individual) vehicles. We also use the data contained in the FleetReporting tool to provide (aggregated) insights to our Clients (your employer) into key aspects of their country's fleet management (such as cost and risk issues) for the purpose of implementing a balanced fleet management approach (cost, environment and safety), managing fleet policy implementation, having the ability to report on global carbon emission as part of the Client's corporate social responsibility obligations and compliance, assessing the effectiveness of policy changes and proactively communicating relevant fleet developments. This processing is done based on our legitimate interest (the performance of the lease agreement that we have with your employer).

By way of example, on the basis of such dashboard reporting, each Client has access to (i) various data pertaining to the CO2 emissions of its vehicle fleet per country, and (ii) measures proposed by LeasePlan to reduce the fleet's environmental impact. LeasePlan and the Client can then study and discuss the company's fleet/vehicle policies, and set targets in order to achieve a lasting reduction of fuel, CO2 emissions and other car expenses. Thus based on such information, each Client can take informed decisions aimed at reducing CO2 emissions within its fleet in a certain country, e.g., by providing eco-driving style training to its Drivers or acquiring more climate neutral vehicles.

- ⇒ Which personal information do we process for this purpose?  
For this purpose we may process the following personal information:
  - From our Client (your employer): Driver name, Client-generated Driver ID, name and contact details of Client's contact person, (email) address, telephone number, nationality, social insurance number (optional: only if required by applicable law or for fiscal purposes) and use of fuel card (optional).
  - Ourselves: vehicle details (e.g., make, model, registration number, license plate number), remaining contract duration, damages sustained by a vehicle, fuel type, number and type of fuel card, fuel consumption and insurance data.
  - From Driver: mileage and description of damages sustained by a vehicle involved in a car accident.
  - Data received from others (such as police, local municipalities, service garage/center): traffic and/or parking fines, mileage and information on vehicle maintenance and repairs.
- ⇒ With whom do we share your personal information?  
We share this information with the authorized (International) Fleet Manager of the Client. See also section 'Sharing data with third parties'.

#### 4.3.6 LEASEPLAN BUSINESS PURPOSES.

##### 4.3.6.a Management reporting.

- ⇒ What does this purpose entail?  
We will process your personal information for various business purposes, for which we have a legitimate interest to process these data, such as data analysis, audits,

developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

⇒ Which personal information do we process for this purpose?

For this purpose we may process various information that we collect in the context of providing our Services (such as your name, contact details, vehicle details etc.), as needed for one of the purposes set out above.

⇒ With whom do we share your personal information?

See section 'Sharing data with third parties'.

4.3.6.b Compliance with laws and legal obligations and protection of LeasePlan assets and interests.

⇒ What does this purpose entail?

To comply with a legal obligation or where we have a legitimate interest we will process your personal information as appropriate or necessary (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence, money laundering, financing of terrorism and other crimes); (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions and other applicable policies; (e) to protect our operations; (f) to protect our rights, privacy, safety or property, and/or that of yours or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. If you and your employer have given consent, LeasePlan can also analyze information about your vehicle(s) if you have already leased a car via LeasePlan, for example to determine the lease price of your new lease car.

⇒ Which personal information do we process for this purpose?

For this purpose we process your name, your contact information, your correspondence with LeasePlan, your use of Services and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

Only if we are required to do so by law or sectorial recommendation to which LeasePlan is subject, your personal information will be provided to supervisory agencies, fiscal authorities and investigative agencies. See also section 'Sharing data with third parties'.

<b>4.4 DATA PERTAINING TO PRIVATE LEASE CLIENTS (INCLUDING SOLE TRADERS AND PARTNERSHIPS) AND PROSPECTIVE CLIENTS.</b>
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**4.4.1 SIGN UP.**

4.4.1.a To be able to accept you as a client

⇒ What does this purpose entail?

We will collect information when you sign up (via our website or otherwise) as a client or as a prospective client. This processing is required for the conclusion and performance of the lease agreement, including assessment, acceptance of you as a client and to adhere to guidance and best practice issued by the regulators and regulatory regime to which part of our business is subject.

⇒ Which personal information do we process for this purpose?

For this purpose we collect your name, gender, title, address, contact details (including your email address, telephone number, driver's license, delivery address or pick-up location, transaction data (such as order, amount(s) to be paid, date of payment), your bank account number and the authorization you give to LeasePlan.



⇒ With whom do we share your personal information?

We share your information with a third party with whom we have an agreement for making online payments, such as the deposit payment and the monthly payments of the lease amount. We only share information that is necessary for the execution of the payments. See also section 'Sharing data with third parties'.

**Credit Reference Checks**

This section is only relevant to you if you are an individual, sole trader or partnership who applies to have a vehicle from us. Credit reference checks are conducted to assess your financial position, to verify the accuracy of the data you have provided to us and to meet our regulatory expectations in respect of financial crime and integrity and conduct risk management. This process may include personal data. The information used for these checks is the information, including any personal data, you have provided to us in the vehicle application process. Furthermore we may use external credit reference agencies to conduct these checks for us and thus supply your data to them or to have you supply your data directly to them. External credit reference agencies will also use publicly available information about you.

**Anti-Money Laundering Screening**

The personal information we have collected from you may be shared in accordance with LeasePlan compliance policies, to conduct know your counterparty due diligence and anti-money laundry screening. During this process, we may engage third parties such as fraud prevention agencies or use compliance screening software tools. If the outcome of these screenings is negative and do not meet LeasePlan requirements, you could be refused a contract or business relationship or have this terminated. For further details of how your information will be used by in this respect, please contact us via the contact form. This is necessary for our own legitimate interests of protecting our business from compliance and integrity risk and it is also necessary for our compliance with legal obligations.

4.4.1.b Portals and apps

⇒ What does this purpose entail?

We will (soon) offer you online portals or apps. Via these portals or apps you can find practical information on your lease car, your contact information and other personal data, report changes thereto, report damage to your vehicle, record appointments for repairs, maintenance or tyre change, contact our customer service, consult and pay fines. This processing is required for the performance of the lease agreement or with your consent where this is required.

⇒ Which personal information do we process for this purpose?

For this purpose we collect your name and email address to send you a temporary password, which you will need to use the platform and apps.

⇒ With whom do we share your personal information?

See section 'Sharing data with third parties'.

**4.4.2 CONTACT.**

4.4.2.a To communicate with you.

⇒ What does this purpose entail?

You can contact us by various means (such as via email, telephone, our website). In this case we will use your personal information to answer your question/request. We can also contact you in relation to the private lease contract. This processing is required for the performance of the lease agreement or with your consent where this is required.

⇒ Which personal information do we process for this purpose?  
For this purpose we may process your name, your contact information, your correspondence with LeasePlan pertaining to your question/request and all other personal information you provide to us and/or which is necessary to appropriately respond to you, (incl. your license plate number), the agreed term of the private lease contract and your financial obligations to us.

⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

#### 4.4.2.b For surveys or other (marketing) communication.

⇒ What does this purpose entail?  
We process your personal information when we send you periodic surveys to request your feedback on our Services and other services performed on the vehicle, for which we have legitimate interest to process these data. With your consent or where you have provided us with your business contact details and we have a legitimate interest (including where you are a prospective client) we may send you marketing communication, to keep you updated on events, special offers, possibilities and current and future products and services of LeasePlan. When we contact you in regard of surveys or marketing communication, we will do so either by email or by postal newsletters/brochures/magazines (postal mailings). If you would no longer like to receive surveys or marketing communication from us, please click here to contact us. This would mean that you have withdrawn your consent and we cannot contact you again for these reasons unless you resubscribe and give us a new consent.

⇒ Which personal information do we process for this purpose?  
For this purpose we process your name, your address, your email address, your license plate number and topics you may be interested in (as may be indicated by you on our website).

⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

### 4.4.3 VEHICLE SERVICES.

#### 4.4.3.a Management of the vehicle.

⇒ What does this purpose entail?  
We process your information in relation to administering your use of the vehicle and to handle the day-to-day management of the vehicle. This processing is required for performance of the lease agreement.

⇒ Which personal information do we process for this purpose?  
For this purpose we process your name, address, (company) email address, lease category, license plate number, make and model, service history and operational contact with you. In addition, you may provide certain information pertaining to vehicle management to us through the LeasePlan portal, or when you call LeasePlan.

⇒ With whom do we share your personal information?  
See also section 'Sharing data with third parties'.

#### 4.4.3.b Repair, maintenance and tires.

⇒ What does this purpose entail?  
We process your information in relation to providing (scheduled) repair and maintenance Services and tyres Services for your vehicle. This processing is required for performance of the lease agreement.

- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect your name, address, (company) email address, license plate number, make and model, service history and operational contact with you. In addition, you may provide certain information to us through the LeasePlan portal (e.g., your phone number to make an appointment for maintenance of the car), or when you call LeasePlan.
- ⇒ With whom do we share your personal information?  
We share information with third parties performing maintenance/repair on the vehicle or changing or replacing tyres, such as dealers/garages, body repair shops or car fitters. See also section 'Sharing data with third parties'.

#### 4.4.3.c Accident management.

- ⇒ What does this purpose entail?  
We process your information by recording and administering accidents that you and/or your vehicle may have been involved in, to restore mobility and handle damage. We will do so by (i) giving you an opportunity to report accidents as they happen at our Customer Call Center, (ii) providing, where applicable, roadside assistance and/or a replacement vehicle and (iii) arranging repair and other necessary follow-up. This processing is required for the performance of the lease agreement. We may also use this information for assessing damage repairs under our damage handling and risk retention policies, for which we have a legitimate interest to process these data.  
We may also be required to process special category data. Please see Accident Management section above.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect the following personal information:
  - Ourselves: license plate number, make and model, service history and operational contact with you.
  - From you: your name, contact details, vehicle details, accident details, damage details, photos of the incident, date of birth, number of passengers in the vehicle, information of witnesses to the accident (if applicable) and any other information you choose to provide to us in the context of the accident (including any information pertaining to possible injuries).
  - From third parties, such as individuals involved in the accident or insurance companies: information of third parties involved in the accident/incident (such as the identity of your passengers, driver and passengers of third-party vehicles, and other third parties involved), information of other third parties (such as witnesses, investigating police officers and others) insurance information, information about the incident and third-party claims.
  - From authorities (such as police): your name, address, license plate number, information regarding the accident, police reports and witness statements.
- ⇒ With whom do we share your personal information?  
We may share certain information with dealers/garages, body repair shops, car fitters, car insurance companies (which may be both affiliated and third-party car insurance companies) and professional experts employed on our behalf or on behalf of third parties (such as lawyers, medical experts, investigators, etc.) for the purpose of damage or claim resolution. See also section 'Sharing data with third parties'.

#### 4.4.3.d e-Mobility card.

- ⇒ What does this purpose entail?  
In case you have an Electric Vehicle, you may be provided with an e-Mobility card for charging your vehicle at charge points. This processing is required for the performance of the lease agreement.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect the following information: your name, email, e-Mobility card number, car license plate number, mileage and related costs. In case of re-imburements we may also need to collect bank account information.

- ⇒ With whom do we share your personal information?  
LeasePlan needs to share the information with the E-Charging solution company/payment company. See also section 'Sharing data with third parties'.

#### 4.4.3.e Traffic and parking fines management.

- ⇒ What does this purpose entail?  
The following may depend on the country where you may have committed traffic and/or parking violations: As the registered owner of the vehicles, traffic and/or parking fines incurred by drivers of the vehicles may be addressed to LeasePlan by the authority that issued a specific traffic or parking fine (such as police or local municipality).

We process your personal information for the purpose of processing and managing the payment of the fine. This processing is required for the performance of the lease agreement.

- ⇒ Which personal information do we process for this purpose?  
We process information that we receive from the competent authorities (such as police or local municipalities): your name, address and license plate number, the nature, place and time of the offense/incident committed by you and the imposed fines.  
We may also be required to process special category data. Please see 'traffic and parking fines management' section above.
- ⇒ With whom do we share your personal information?  
See also section 'Sharing data with third parties'.

#### 4.4.4 MOBILITY SERVICES.

##### 4.4.4.a Roadside assistance.

- ⇒ What does this purpose entail?  
When you experience a car malfunction, for example, a flat tyre or mechanical difficulties while on the road, LeasePlan is able to arrange roadside assistance, for which we work closely with contracted third parties. This processing is required for the performance of the lease agreement.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect the following information: your name, email, mobile phone number, license plate number and location of where assistance was needed and provided.
- ⇒ With whom do we share your personal information?  
We share your information with third parties providing on the road repair services, towing services or a replacement car. See also section 'Sharing data with third parties'.

#### 4.4.5 LEASEPLAN BUSINESS PURPOSES.

##### 4.4.5.a Management reporting.

- ⇒ What does this purpose entail?  
We process personal information for various LeasePlan business-related purposes for which we have a legitimate interest to process these data, such as data analysis, audits, developing new products, enhancing, improving or modifying our websites and Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyze data that we collect when using our digital media and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

- ⇒ Which personal information do we process for this purpose?  
For this purpose we may process your name, your email address, your IP address, gender, date of birth, place of residence, digits of your postal code and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

#### 4.4.5.b Compliance with laws and legal obligations and protection of LeasePlan assets and interests.

- ⇒ What does this purpose entail?  
To comply with a legal obligation or where we have a legitimate interest we will process your personal information as appropriate or necessary (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence, money laundering, financing of terrorism and other crimes); (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions and other applicable policies; (e) to protect our operations; (f) to protect our rights, privacy, safety or property, and/or that of yours or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we process your name, contact information, the date, place and country of birth -in case of a company of the ultimate beneficial owner of the company; we may also process the name, address and the date, place and country of birth of the person(s) who represent the company towards LeasePlan; your correspondence with LeasePlan, your use of Services and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph.
- ⇒ With whom do we share your personal information?  
Only if we are required to do so by law or sectorial recommendation to which LeasePlan is subject, your personal information will be provided to supervisory agencies, fiscal authorities and investigative agencies. See also section 'Sharing data with third parties'.

## 4.5 DATA PERTAINING TO PRIVATE BUYERS OF USED VEHICLES

### 4.5.1 PURCHASE.

#### 4.5.1.a Purchase of a LeasePlan Occasion.

- ⇒ What does this purpose entail?  
We process your information in relation to your (potential) purchase of a LeasePlan occasion, if applicable, the trade in of your vehicle and other related Services. This includes the execution of the purchase agreement, the delivery of Services and the settlement of the payment transaction. This processing is required for the conclusion and performance of the agreement, including assessment, acceptance of you as a client.

- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect your name, gender, title, (business) contact details (including your email address, telephone number, name of your company), information related to your trade in vehicle and details needed to complete the transaction, including bank account details.
- ⇒ With whom do we share your personal information?  
We may share this information with trade in parties or financial services partners. See also section 'Sharing data with third parties'.

#### **4.5.2 BUYER CONTACT.**

4.5.2.a To communicate with you.

- ⇒ What does this purpose entail?  
We collect your information when you contact us via one of our online contact forms (or provide information in one of our occasion centers), for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for our Services. We can contact you relating to a (potential) purchase of a vehicle. This processing is required for the performance of the agreement that you have with us or with your consent where this is required.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect your name, gender, title, contact details (including your email address, telephone number, name of your company (where appropriate)) and any other information that you provide to us in the open field entry of the contact form, where you can, for example, pose your question, describe your suggestion, make a compliment or share a complaint.
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

4.5.2.b For surveys or other (marketing) communication.

- ⇒ What does this purpose entail?  
We process your personal information when we send you a survey to request your feedback on our Services, for which we have legitimate interest to process these data. With your consent or where we have a legitimate interest we may send you marketing communication, to keep you updated on events, special offers, possibilities and current and future products and services of LeasePlan. When we contact you in regard of surveys or marketing communication, we will do so either by email or by postal newsletters/brochures/magazines (postal mailings). If you would no longer like to receive surveys or marketing communication from us, please contact us via the contact details provided in this Statement. This would mean that you have withdrawn your consent and we cannot contact you again for these reasons unless you resubscribe and give us a new consent.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we process your name, your address, your email address, and your interests (as indicated by you).
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

### 4.5.3 LEASEPLAN BUSINESS PURPOSES.

#### 4.5.3.a Management reporting.

⇒ What does this purpose entail?

We process personal information for various LeasePlan business-related purposes for which we have a legitimate interest to process these data, such as data analysis, audits, developing new products, enhancing, improving or modifying our websites and Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyze data that we collect when using our digital media and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

⇒ Which personal information do we process for this purpose?

For this purpose we may process your name, your email address, your IP address, gender, date of birth, place of residence, digits of your zip code and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

See section 'Sharing data with third parties'.

#### 4.5.3.b Compliance with laws and legal obligations and protection of LeasePlan assets and interests.

⇒ What does this purpose entail?

To comply with a legal obligation or where we have a legitimate interest we will process your personal information as appropriate or necessary (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence, money laundering, financing of terrorism and other crimes); (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions and other applicable policies; (e) to protect our operations; (f) to protect our rights, privacy, safety or property, and/or that of yours or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

⇒ Which personal information do we process for this purpose?

For this purpose we process your name, contact information, the date, place and country of birth -in case of a company of the ultimate beneficial owner of the company; we may also process the name, address and the date, place and country of birth of the person(s) who represent the company towards LeasePlan; your correspondence with LeasePlan, your use of Services and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

Only if we are required to do so by law or sectorial recommendation to which LeasePlan is subject, your personal information will be provided to supervisory agencies, fiscal authorities and investigative agencies. See also section 'Sharing data with third parties'.



## 4.6 DATA PERTAINING TO PROFESSIONAL BUYERS OF USED VEHICLES (Traders)

### 4.6.1 REGISTRATION AND PURCHASE.

#### 4.6.1.a Registration as a professional trader.

- ⇒ What does this purpose entail?  
To be able to purchase LeasePlan Occasion on a CarNext auction or purchase a vehicle via our one of our carnext websites, traders need to be registered with LeasePlan as a professional trader. This processing is done based on our legitimate interest (the performance of an agreement, including assessment, acceptance) or based on a legal obligation.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect your name, contact details (including your email address, telephone number), your ID and information related to your company including Chamber of Commerce document and VAT certificate,
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

#### 4.6.1.b Purchase of LeasePlan Occasions.

- ⇒ What does this purpose entail?  
We process your information in relation to your (potential) purchase of (a) LeasePlan occasion(s) and other related Services via an auction or via the website [www.carnextmarketplace.com](http://www.carnextmarketplace.com). This includes the execution of the purchase agreement, the delivery and the settlement of the payment transaction. This processing is based on legitimate interest (the conclusion and performance of the purchase agreement).
- ⇒ Which personal information do we process for this purpose?  
For this purpose we collect your name, contact details (including your email address, telephone number), your ID and information related to your company including Chamber of Commerce document and VAT certificate, details needed to complete the transaction, including bank account details.
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.

### 4.6.2 TRADER CONTACT.

#### 4.6.2.a To communicate with you.

- ⇒ What does this purpose entail?  
We collect your information when you contact us via one of our online contact forms (or provide information in one of our occasion centers), for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for our Services. We can contact you relating to a (potential) purchase of a vehicle. This processing is done based on our legitimate interest (the performance of the agreement that we have with the Trader) or with your consent.
- ⇒ Which personal information do we process for this purpose?  
For this purpose we may process your name, your business contact details, your correspondence with LeasePlan pertaining to your question/request and all other personal information you provide to us and/or which is necessary to appropriately respond to you.
- ⇒ With whom do we share your personal information?  
See section 'Sharing data with third parties'.



#### 4.6.2.b For surveys or other (marketing) communication.

⇒ What does this purpose entail?

We process your personal information when we send you a survey to request your feedback on our Services for which we have legitimate interest to process these data. With your consent or where you have provided business contact details and we have a legitimate interest we may send you marketing communication, to keep you updated on events, special offers, possibilities and current and future products and services of LeasePlan. When we contact you in regard of surveys or marketing communication, we will do so either by email or by postal newsletters/brochures/magazines (postal mailings). If you would no longer like to receive surveys or marketing communication from us, please contact us via the contact details provided in this Statement.

⇒ Which personal information do we process for this purpose?

For this purpose we process your name, your address, your email address, and your interests (as indicated by you).

⇒ With whom do we share your personal information?

See section 'Sharing data with third parties'.

### 4.6.3 LEASEPLAN BUSINESS PURPOSES.

#### 4.6.3.a Compliance with laws and legal obligations and protection of LeasePlan assets and interests.

⇒ What does this purpose entail?

To comply with a legal obligation or where we have a legitimate interest, we will process your personal information as appropriate or necessary (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence, money laundering, financing of terrorism and other crimes); (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions and other applicable policies; (e) to protect our operations; (f) to protect our rights, privacy, safety or property, and/or that of yours or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

⇒ Which personal information do we process for this purpose?

For this purpose we process your name, contact information, the date, place and country of birth -in case of a company of the ultimate beneficial owner of the company; we may also process the name, address and the date, place and country of birth of the person(s) who represent the company towards LeasePlan; your correspondence with LeasePlan, your use of Services and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

Only if we are required to do so by law or sectorial recommendation to which LeasePlan is subject, your personal information will be provided to supervisory agencies, fiscal authorities and investigative agencies. See section 'Sharing data with third parties'.

## 5. Sharing data with third parties

In addition to what is indicated for each purpose above regarding sharing of personal information, we may also share personal information:

- **Within the LeasePlan group for the purposes described in this Statement.**
  - You can consult the list and location of our Leaseplan entities here.
- **To our third-party service partners and providers, to facilitate services they provide to us.**

In order to provide you with our services, we often work closely with Service Partners and Service Providers. Our independent Service Partners assist us in providing our leasing and other services to you, and include car dealerships, car maintenance providers, body repair shops, and roadside assistance providers, but also rental service companies, and the administrators of our driver safety programs.

Service Providers are companies we retain that support us in running our business, for example to help us maintain our IT network and related infrastructure, and security and access controls to our premises.

We also use and disclose your personal information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- **To comply with applicable law and regulations.**
  - This may include sharing information with Credit Reference Agencies and Fraud Prevention Agencies. Please see the relevant sections above for further information and contact details for these agencies.
  - This can include laws outside your country of residence.
- **To cooperate with public and government authorities.**
  - These may include regulatory or governmental bodies to which LeasePlan is subject to.
  - To respond to a request or to provide information we believe is important
  - These can include authorities outside your country of residence.
- **To cooperate with law enforcement.**
  - For example, when we respond to law enforcement requests and orders or provide information we believe is important.
- **For other legal reasons.**
  - To enforce our terms and conditions; and
  - To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- **In connection with a sale or business transaction.**
  - We have a legitimate interest in disclosing or transferring your personal information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings) Such third parties may include, for example, an acquiring entity and its advisors.

## 6. International transfer of personal data

Due to the global nature of our organization and Services, your personal information may be stored and/or processed in a country other than the one you reside in.

Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available [here](#)). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as, such as through LeasePlan's own Binding Corporate Rules or through contractual arrangements put in place with third parties. You may obtain a copy of these measures by contacting us via the contact form.

## 7. Security and retention

### How we secure personal data

We seek to use organisational, technical and administrative measures to protect personal information within our organization.

Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the [Contact details](#) provided in this Statement.

### How long we retain personal data

We will retain your personal information for as long as necessary or permitted in light of the purposes outlined in this Statement and consistent with applicable law.

The criteria used to determine our retention periods include:

- **Retention for our business relationship.** The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you use a LeasePlan vehicle);
- **Retention in case of legal obligation.** Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- **Retention to protect our legal position.** Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).
- **Retention in case of claims.** We will retain your personal information for the period in which you might legally bring claims against us (as relevant).
- **Retention in accordance with regulatory requirements.** We will retain your personal information where we are required to do so by regulatory regimes and regulations applicable to us (in the UK this includes the FCA regulatory regime).
- **Prospects.** We will retain your contact details for our marketing purposes (as above) for a maximum of two years unless you tell us within that period that you wish to unsubscribe or withdraw your consent.
- **Retention of CCTV images.** We apply a separate criteria to retention of these records, as follows. We retain CCTV images for three months and after that they will be erased because we will not need to retain them for the purposes listed (above).

## 8. Children's privacy

Our Services are not directed at individuals under the age of 18.

## 9. Your rights and contacting us

### Your rights

If you would like to request to review, correct, update, suppress, restrict or delete your personal information processed by us, object to the processing of personal information, to object to automated decision making or if you would like to request to receive an electronic copy of your personal information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us via [the contact form]. We will respond to your request in accordance with applicable law.

In your request, please make as clear as possible what personal information your request relates to. For your protection, we will only implement requests with respect to the personal information associated with the particular email address as you indicated in the contact form, and we may request you to provide verification of your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and in any event within any applicable legally required timeframes.



Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that began prior to requesting such change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

#### Questions?

If you have any questions or complaints about this Statement, please contact us via the contact form]

Because email communications are not always secure, please do not include sensitive information in your emails to us.

#### Additional information regarding the EEA

You may also:

- Contact our Data Protection Officer (“**DPO**”) via the contact form or via: LeasePlan Corporation N.V., attn. Data Protection Officer, Gustav Mahlerlaan 360, 1082 ME Amsterdam, the Netherlands
- Lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities is available [here](#).

### **10. Changes to this Privacy Statement**

We may change this Statement at any time. Please take a look at the “*Last Updated*” legend at the top of this page to see when this Statement was last revised. Any changes to this Statement will become effective when we post the revised Statement on the Services. Your use of the Services following these changes means that you accept the revised Statement.

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