



CLIENT PRIVACY NOTICE

Pursuant to Article 13(1) and 13(2) of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (OJ L 119, p. 1, hereinafter "GDPR"), please be advised that:

I. PERSONAL DATA CONTROLLER

LeasePlan Fleet Management (Polska) sp. z o.o. with its registered office in Warsaw (02-676), ul. Postępu 14B ("LeasePlan", "we", "us") is the data controller for your personal data. If you have any questions or concerns regarding personal data protection, please use the "Right to Personal Data Protection" form available on LeasePlan's website www.leaseplan.com.

II. HOW WE COLLECT YOUR PERSONAL DATA

Your personal data processed by us are collected directly from you when you enter into a contract with us and when we provide services under the contract.

III. CATEGORIES OF DATA, PURPOSES AND GROUNDS FOR DATA PROCESSING:

Personal data of the Client's employees and persons representing the Client with respect to: first name, surname, business phone number, business email address and, in the case of employees who are car users, identity card number, as well as data recorded by telematics devices installed in vehicles (including: vehicle location, immobilisation of the vehicle, monitoring of vehicle mileage, recording of hazardous events) may be processed by LeasePlan for the following purposes:

- a) to perform the contract with you (legal basis: Article 6 1. b. of the GDPR),
- b) to obtain credit approval in order to perform the contract (legal basis: Article 6 1. b. of the GDPR),
- c) to establish, pursue or defend a legal claim, if any, for which we have a legitimate interest (legal basis: Article 6 1. f. of the GDPR),
- d) to meet the obligations in relation to the review and monitoring of financial transactions for money laundering, as required under the Anti-Money Laundering Act (legal basis: Article 6 1. c. of the GDPR),
- e) to settle the services and meet the accounting obligations, as required under Article 74 2. 4. of the Accounting Act (legal basis: Article 6 1. c. of the GDPR),
- f) for statistical purposes (to better tailor the services to the needs of our customers, to optimize our products and service processes, to build a customer knowledge base, to perform financial analysis of our company, etc.), where we have a legitimate interest to do so (legal basis: Article 6 1. f. of the GDPR),
- g) to directly offer you products and services (direct marketing) and to send you commercial information, or where we have a legitimate interest in promoting our products and services (legal basis: Article 6 1. f. of the GDPR),
- h) to recover debts, process insurance policies and settle insurance claims in order to perform the contract with you (legal basis: Article 6 1. b. of the GDPR).

Data collected by telematics devices installed in vehicles are not verified and monitored on an ongoing basis by LeasePlan. The above data are actively processed only if it is necessary to use them for a specific recovery, insurance or claims management process.

IV. RIGHT TO OBJECT

Where your personal data are processed on the basis of our legitimate interest, as described above, you have the right to object to the processing of your data described above at any time. We shall cease the processing of your data for those purposes unless we can demonstrate that important legitimate grounds exist in relation to your data which take precedence over your interests, rights and freedoms, or where we may need your data to establish, pursue or defend a legal claim.

V. DATA RETENTION PERIOD

Your personal data:

- a) resulting from the contract are retained throughout the duration of the contract and until expiration of the statute of limitations for the claims, pursuant to Article 118 of the Civil Code,
- b) kept as accounting data and necessary to document financial security measures used pursuant to the law on counteracting money laundering and the financing of terrorism are retained for a period of 5 years starting from the first day of the year following the financial year in which the operations and transactions were finally completed, settled or paid,
- c) necessary to obtain credit approval are processed for 5 years starting from the first day of the year following the year in which the business relationship with the client is terminated or in which occasional transactions are performed,
- d) collected for statistical purposes are retained for a period of 3 years but no longer than until the statistics have been analyzed,
- e) obtained for the purpose of sending you commercial information and direct marketing are retained for as long as the legitimate interest in performing the contract exists, whereas after the expiry of the contract and until your withdrawal of the consent, only data processed on the basis of the consent are retained.

VI. DATA RECIPIENTS

Your personal data may be shared with entities and authorities authorized to process such data under applicable laws, as well as with entities performing debt recovery activities and entities within our Group.

Your personal data may be transferred to processors processing personal data on behalf of the controller, including IT service providers, accounting firms, car dealerships and maintenance service providers provided that such processing is done under a contract with the controller and solely in compliance with the controller's instructions.

Data from telematics devices installed in vehicles are provided by Keratronik sp. z o.o. (company supplying and servicing telematics devices to LeasePlan) subject to appropriate safeguards. The processing of personal data collected in the manner described above does not lead to automated decision-making in relation to you.

VII. DATA PROVISION

The provision of your personal data is voluntary but LeasePlan needs these data to execute and perform the contract. Where your data are collected on the basis of your consent, provision of your personal data is voluntary.

VIII. RIGHT TO WITHDRAW CONSENT FOR PROCESSING OF YOUR PERSONAL DATA

In some cases, we may ask you to give consent to the processing of your data. If you have given us consent to the processing of your personal data, you have the right to withdraw your consent at any time. Withdrawal of your consent does not affect the lawfulness of processing based on your consent before its withdrawal.

IX. RIGHTS OF DATA SUBJECTS

Under the GDPR, you have the following rights:

- a) right to access and receive a copy of your data;
- b) right to rectification (correction) of your data;
- c) right to erasure and restriction of processing;
- d) right to object to the processing of your data;
- e) right to data portability;
- f) right to lodge a complaint with a regulatory authority.

X. AUTOMATED DECISION-MAKING

Your personal data are not used for automated decision-making or profiling.

XI. TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY OR INTERNATIONAL ORGANIZATIONS

Due to the global nature of our organization and services, your personal data may be stored and/or processed in a country other than your country of residence.

Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards. For transfers from the EEA to third countries not considered by the European Commission as providing adequate protection, we have put appropriate security measures in place, such as for example the LeasePlan Binding Corporate Rules or the European Commission's Model Clauses. Copies of these security measures may be obtained by contacting us via the contact form referred to in section 1 of this privacy notice.