

Last updated: 17 May 2021

LeasePlan

Global Privacy Statement

LeasePlan is committed to protecting the personal information processed by us. Compliant privacy and information security practices are therefore integral components of LeasePlan's Services, corporate governance, risk management and overall accountability. We only process such personal information as is necessary for our business activities and the provision of the LeasePlan Services.

LeasePlan's Privacy Pledges

Whenever and however we process your personal information:

Transparent: We help you understand how your data is collected and used.

Privacy by design: 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 information 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. Please visit the local version of this Privacy Statement in the country you are using LeasePlan's Services, as to be found on the local website of a LeasePlan leasing entity.

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

[Click here to download the Privacy Statement.](#)

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1. Scope of this Privacy Statement

This Privacy Statement ("Statement") describes our policy regarding the processing of personal data collected from:

- I. Website visitors/users ("**Website Visitors**");
- II. Business Clients ("**Clients**");
- III. Clients' employees/Drivers ("**Drivers**");
- IV. Private lease clients (including one-person businesses) ("**Private Lease Clients**");
- V. Private buyers of used vehicles ("**Private Buyers**");
- VI. Professional buyers of used vehicles ("**Traders**"); and
- VII. Suppliers of goods and services ("**Suppliers**").

(or individual and company prospects, in any of the above categories).

We collect and use your personal information we receive via registration on our website, our various vehicle and fleet leasing, management, and driver mobility services and in our business activities, as further described in Section 1 ("**Services**").

This Privacy Statement does not apply to the following affiliates and/or services:

- Euro Insurances DAC or LeasePlan Insurance;
- PowerD or LeasePlan Energy;
- CarNext B.V. and its affiliates;

Or to the services provided by these affiliates, which are governed by separate privacy statements.

Please also note that any processing of your personal information via our telematics services will take place under the applicable Telematics Privacy Statement. Other specific services may be subject to specific privacy statements.

Responsibilities of Business Clients

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

2. Who we are

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

Lease Plan Portugal – Comércio e Aluguer de Automóveis e Equipamentos Unipessoal, Lda., Lagoas Park, Edifício 6, 2740-244 Porto Salvo

LeasePlan Corporation N.V. and LeasePlan Global B.V., will sometime be joint data controllers:

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

LeasePlan Portugal and LeasePlan Corporation N.V. and LeasePlan Global B.V. are jointly called “LeasePlan” and “we”, “our” or “us”.

3. How we collect your data

LeasePlan and our service partners collect personal data in various ways, which include

- Offline

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

- Online

We collect your personal information when you visit our websites or social media channels: if your social media accounts are linked to your Services account, or you share information from our websites on your social media platforms, you share the data from your social media accounts with us, for example, your name, email address, photo, contacts list and any information that is accessible, or to which you have given us access.

We process your personal information when you initiate the procurement process via our online services by registering on our platform.

Information is gathered both online and offline that allows us to initiate the contract, particularly to evaluate and approve the leasing procedure, or to ensure compliance with the regulatory procedures to which LeasePlan is subject.

Through the Services

Most of the data we collect are in relation to the vehicle management services we provide to you as the driver and to our Client, your employer, if you are using a company car. This starts with the registration of the contract 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 receive are the recipient of traffic fines in relation to your leased vehicle. Next to our core-leasing activities, we also provide several other related services, such as e-mobility services, fuel card and EV recharge services, electrical chargers, car rental from rent-a-car companies, and roadside assistance. Another service we provide relates to sales of used vehicles.

- From Other Sources

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

- Drivers' employers if you use a company car;
- The relevant authorities (e.g., police) where we receive received 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;
- Visiting our websites or social media channels;
- Joint marketing partners when they share the information with us.

We need to collect personal information to start the contract provide the requested Services to you or to handle queries, questions, comments, complaints related to our Services. If you do not provide the information requested, we may not be able to start the contract, provide the Services or respond to your request. If you disclose any personal information relating to other persons directly to us or to our service providers, you represent that you have the authority to do so and to permit us to use the information under this Privacy 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 do this for compliance with regulatory rules, self-regulatory practices, or procedures relevant to our business, to prevent or detect crime, to protect the security of our communication systems and procedures, and for quality control and staff training purposes.

According to the legislation in force, telephone calls, emails, text messages and any other communications with us, will be recorded and monitored to ensure compliance with regulatory requirements and procedures relevant to our business, to prevent and detect crime, protect 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 () we will do so. In addition, where appropriate and having regard to data protection law, our monitoring will be to check for inappropriate content in

communications. In limited and specific 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 think fraud or other crime is being committed, where offenses are suspected and where the monitoring is proportionate to the disciplinary offense, or where we suspect non-compliance with anti-money laundering regulations to which we are subject. Telephone calls may be recorded for these purposes.

4. For which purposes we use your data

4.1 DATA REGARDING 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 you have with us, to respond to a request or with your consent.

⇒ Which personal information do we process for this purpose?

For this purpose, we collect your full name, gender, title, (business) contact details (including your email address, telephone number, name of your company) license plate and any other information 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 the section 'Sharing data with third parties'.

4.1.1.b Digital onboarding

⇒ What purpose does this entail?

We collect your personal information via our *online* contact forms, to initiate the business relationship, collect financial and other information and to formalize the contract and validate the regulatory requirements to which we are subject.

⇒ Which personal information do we process for this purpose?

For this purpose, we process the name, gender, title and address, contact information (including *email* and telephone number), national and tax identification numbers, civil status, data for evaluating the financial capacity to make the contract; the date, place and country of birth of the effective beneficiary of the counterparty with which LeasePlan wishes to initiate a business relationship, we may also process the name, address, date, place and country of birth of the representatives of the counterparties. and the national and tax identification numbers; driver information, name, gender, email, telephone number, delivery address or vehicle collection location, data regarding transactions (with references, amounts payable, payment

date), bank account number and direct debit authorization given to LeasePlan.

⇒ With whom do we share your personal information?

See the section "Sharing data with third parties".

4.1.1.c For surveys or other (marketing) communication

⇒ What does this purpose entail?

We process your personal information when you complete a survey on our website for feedback on our websites and/or Services, with your consent or for which we have a 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 regarding surveys or marketing communication, we will do so either by email, phone, or by postal mailings (newsletters/brochures/magazines). If you would no longer like to receive surveys or marketing communication from us, please contact us by using the contact form in this Statement. Based on your visit to a website of LeasePlan, we can show you personalized advertisements outside the LeasePlan website. To understand what relates to you, we may use manual and automatic tools to analyze your personal information.

To facilitate your use of our online Services or applications, we may analyze data 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, email, 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 process your name, your address, your email address, and topics you may be interested in (as indicated by you on our website).

⇒ With whom do we share your personal information?

See the 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 use to post feedback.

Likewise, various social media websites, such as Snapchat, Facebook, Twitter, or LinkedIn, may contain LeasePlan advertisements containing links to our websites. These social media websites may, with your

consent, share information provided by you with us when you follow a link to a website.

We are not responsible for the collection, processing 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 and/or advertisements. Processing of personal information is subject to privacy policies and practices of these other organizations.

⇒ 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 by us when using social media functionalities.

⇒ With whom do we share your personal information?

See the section 'Sharing data with third parties'.

4.1.3 COOKIES AND SIMILAR TECHNOLOGIES

Any processing of your personal information via cookies and/or similar technologies will take place under our Cookie Statement, available on our website and here.

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 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, email, 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 Privacy Statement or otherwise provided to us by you, if required for the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

See the 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 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 remedies or limit the damage 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 Privacy Statement or otherwise provided to us by you, if required for the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

We only provide your personal information to supervisory, tax and investigative authorities when required to do so by law or a sectorial recommendation to which LeasePlan is subject. See also the section 'Sharing data with third parties'.

4.2. DATA REGARDING CLIENTS

4.2.1 CLIENT ACCOUNT MANAGEMENT

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

⇒ What does this purpose entail?

We collect your personal information to handle day-to-day management and administration of the Client accounts, such as complying with contracts and keeping you informed of all important developments about the Services and other information relevant for the Client contract and account. This processing is based on a legitimate purpose within the ambit of the performance of the lease agreement we have with you 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 for our Client online accounts.

⇒ With whom do we share your personal information?
See the 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 respond to your question/request. We can also contact you, for example, regarding day-to-day management and administration of your Client account. This processing is based on our legitimate business interest and relates to the performance of the lease agreement we have with you, 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 regarding your question/request and all other personal information you provide to us and/or which is necessary to appropriately respond to you. Telephone calls to our customer support service will be recorded for quality monitoring and training purposes, based on our legitimate interest.

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

4.2.1.c For surveys or other (marketing) communication

⇒ What does this purpose entail?

We process your personal information to send you surveys, for which we have a legitimate interest to process these data. We will send you these surveys by email or SMS and ask you to give us your feedback regarding our Services and other services used with the vehicle. With your consent or where we have a legitimate interest, we may send you marketing communication, for example, to keep you updated on events, special offers, possibilities and current and future products and services of LeasePlan. We may also send you postal mailings (newsletters/brochures/magazines). To understand what relates to you, we may use manual and automatic tools to analyze your personal information. If you would no longer like to receive surveys or marketing communication from us, please contact us by using the contact form in this Statement.

To facilitate your use of our online Services or applications, we may analyze data 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, email, 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 and your business contact details and the interests (as indicated by you).

⇒ With whom do we share your personal information?
See the 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 to ensure appropriate access controls and security, for which we have a legitimate interest (regarding the 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. We may also process video and/or audio information about you through video/audio recording equipment, such as for instance CCTV.

⇒ With whom do we share your personal information?

See the section 'Sharing data with third parties'.

4.2.3 CLIENT REPORTING

4.2.3.a MyFleet

⇒ What does this purpose entail?

We provide the online reporting tool 'MyFleet' to Clients. Clients' contact persons can log onto these tools to review the status of their fleet and for damage reporting, contract management and to use other fleet reporting functionalities, such as dashboard reporting, trend analysis reporting, vehicle mileage and lease end date. This processing is based on our legitimate interest and relates to the performance of the lease agreement we have with our 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 log-in details (e.g., username and password).

⇒ With whom do we share your personal information?

See the section 'Sharing data with third parties'.

4.2.4 LEASEPLAN BUSINESS PURPOSES

4.2.4.a Management reporting

⇒ What does this purpose entail?

We 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.

To facilitate your use of our online services or applications, we may analyze data 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, email, 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 various types of information we collect in providing our Services (such as your name, contact details, fleet details etc.), and any other information mentioned in this Privacy Statement, or which you provide to us for any purpose, if required for the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

See the section 'Sharing data with third parties'.

4.2.4.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 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) Credit checks;
- (c) to comply with legal process;
- (d) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (e) to enforce our terms and conditions and other applicable policies;
- (f) to protect our operations;
- (g) to protect our rights, privacy, safety, or property, and/or that of yours or others; and
- (h) to allow us to pursue remedies or limit the damage 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 counterparty that LeasePlan wants to do business with, the correspondence with LeasePlan, their use of our Services and any other information referred to in this Privacy Statement, if necessary, to comply with any of the purposes referred to in the previous paragraph; we may also process the name, address and the date, place and country of birth of the representatives of the counterparties; correspondence with LeasePlan, their use of our Services and any other information mentioned in this Privacy Statement, if required for any 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, will your personal information be provided to supervisory agencies, fiscal authorities and investigative agencies. See also the section 'Sharing data with third parties'.

4.3 DATA REGARDING DRIVERS

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 process your personal information to respond to your question/request. We can also contact you in relation to your vehicle or other issues relevant to drivers of LeasePlan vehicles. This processing is based on our legitimate interest and is part of delivering the Services to you and your employer under the lease agreement we have with your employer) or with your consent.

⇒ Which personal information do we process for this purpose?

For this purpose, we process your name, your contact information, your correspondence with LeasePlan regarding your question/request and all other personal information you provide to us and/or which is necessary to respond to you appropriately, including your license plate number. We may also record your telephone calls with customer services departments for quality and training purposes, for which we have a legitimate business interest.

⇒ With whom do we share your personal information?

See the 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 to send you periodic surveys for which we have a legitimate interest to process these data. We will send you these surveys by email or text message and ask for your feedback about our Services and other services supplied regarding the vehicle. 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 regarding surveys or marketing communication, we will do so either by email or by postal mailings (newsletters/brochures/magazines). To understand what relates to you, we may use manual and automatic tools to analyze your personal information. If you would no longer like to receive marketing communication from us, please contact us via the contact form or marketing communication from us, please contact us by using the contact form in this Statement.

To facilitate your use of our online services or applications, we may analyze data 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, email, 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 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 the 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, to ensure the implementation of the Services contracted and to handle the day-to-day management of the vehicle, for which we have a legitimate interest, which is related to delivering the Services to you and your employer under the lease agreement we have with your employer).

⇒ Which personal information do we process for this purpose?

For this purpose, we process your name, address, (business) email address, license plate number, vehicle make and model, service history and operational contact with you. In addition, you may provide certain information regarding vehicle management to us through the LeasePlan portal, or when you call LeasePlan.

⇒ With whom do we share your personal information?

We share information regarding management of the vehicle with our Clients (your employer). See also the 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, maintenance, and tire Services for your vehicle and to analyze, predict and proactively refer vehicles to partners that provide these services. We have a legitimate interest related to delivering the Services to you and your employer under the lease agreement we have with your employer.

⇒ Which personal information do we process for this purpose?

For this purpose, we collect your name, address, (business) email address, license plate number, vehicle make and model, service history and operational contact with you. In addition, you may provide certain information to us via the LeasePlan portal (e.g., your phone number to make an appointment for maintenance of the car), or when you call LeasePlan, which can also be processed for that purpose.

⇒ 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 tires, such as dealers/garages, body repair shops or car fitters. See also the 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 you and/or your vehicle may have been involved in, to restore mobility and handle damage. We will do so by (i) allowing you 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 based

on our legitimate interest, and this is also related to delivering the Service to you and your employer under the lease agreement 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 also have a legitimate interest to process these data.

⇒ Which personal information do we process for this purpose?

For this purpose, we collect the following personal information:

- From ourselves: license plate number, vehicle 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 provide to us regarding the accident (including any information regarding 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 MyFleet tool. 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 damage or claim resolution. See also the 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 to process and manage 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.

⇒ Which personal information do we process for this purpose?

We process information we receive from the competent authorities (such as police or local municipalities): your name, address, and license plate number, the type, place and time of the offense/incident committed by you and the fines imposed.

⇒ 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 the section 'Sharing data with third parties'.

4.3.2.e Fuel card, EV charging 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. If you have an electric vehicle, you may be provided with an EV charging card to charge your vehicle at charge points. We may also arrange for the placement of an EV charge station. This processing is based on our legitimate interest and is also related to delivering the Service under the lease agreement we have with your employer).

We may further collect certain information to manage toll-related activities of a fleet, which includes information regarding location, date and time and toll charges.

⇒ Which personal information do we process for this purpose?

For this purpose, we collect the following information: your name, contact information, email address, fuel, or EV charging card number, charging station number, address, phone number, car license plate number, fuel information, mileage, and related costs. If re-imbursements occur, 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/ EV charging solution/ payment company. Also, our Client (your employer) may have access to certain personal information provided by us on our Internet or online reporting tool MyFleet. 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). Clients can also request fuel cards or EV charging cards via MyFleet. See also the 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 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 based on our legitimate interest, and this is also related to delivering the Service under the lease agreement we have with your employer) or if applicable, the agreement 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) rent-a-car companies. See also the 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 tire or mechanical difficulties while on-the-road, LeasePlan can arrange roadside assistance, for which we work closely with contracted third parties. This processing is based on our legitimate interest and is also related to delivering the Service to you and your employer under the lease agreement 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 address, mobile phone number, license plate number and the location 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 the section 'Sharing data with third parties'.

4.3.4 DRIVER SAFETY PROGRAM

4.3.4.a Preparation, management, and administration of training

⇒ What does this purpose entail?

We provide various driver safety and risk management training programs to analyze and improve driving behavior, promote Client's proactive commitment to safety and good corporate citizenship, decrease accident rates, validate the effectiveness of Client'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). Any personal data collected by the third party in relation to this is subject to the privacy practices of such third party. We receive back from these third parties your 'driver risk index' (information about potential risks identified through questionnaire processes), training recommended, signed up for and completed. This processing is based on our legitimate interest and is also related to delivering the Service under the lease agreement we have with your employer) or with your consent.

⇒ 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, (business) 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, and with our Clients (your employer). See also the 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?

We provide online portals and apps with various functionalities. For example, you can, via our portals and apps, find practical information about your lease vehicle, alter your name, contact details and other personal information, report damage to your vehicle, schedule appointments for repairs, maintenance, or a tire change with online appointment planners, contact our Driver Contact Centers, view, and pay fines, claim (fuel) expenses and, if you have an electric vehicle, manage charging.

We may also provide you with dashboard-type overview that can provide you with insight into your use of the vehicle (such as your average fuel efficiency, your damage, etc.). This processing is based on our legitimate interest, and this is also related to delivering the Service to you and your employer under the lease agreement 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 you can access our various online portals and apps.

⇒ With whom do we share your personal information?

See the section 'Sharing data with third parties'.

4.3.5.b MyFleet

⇒ What does this purpose entail?

MyFleet entails dashboard reporting on a country and/or international level to our Client (your employer). MyFleet allows Clients for instance to access and evaluate the mileage or the remaining lease period of (individual) vehicles. We also process the data in this fleet reporting 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) to implement 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 based on our legitimate interest and is also related to delivering the Service to you and your employer under the lease agreement we have with your employer).

For example, based on such dashboard reporting, each Client has access to (i) various data regarding 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 to reduce fuel, CO₂ emissions and other fleet 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 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, damage sustained by a vehicle, fuel type, number and type of fuel card, fuel consumption and insurance data.
- From Driver: mileage and description of damage 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 the section 'Sharing data with third parties'.

4.3.6 LEASEPLAN BUSINESS PURPOSES

4.3.6.a Management reporting

⇒ What does this purpose entail?

We process your personal information for various business purposes, for which we have a legitimate interest to process 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 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, email, 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 various types of information we collect in providing our Services (such as your name, contact details, fleet details etc.) and any other information referred to in this Privacy Statement, or which you provide to us, where necessary to comply with for any of the purposes set out above.

⇒ With whom do we share your personal information?

See the 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 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) part of credit check process;
- (c) to comply with legal process;
- (d) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (e) to enforce our terms and conditions and other applicable policies;
- (f) to protect our operations;
- (g) to protect our rights, privacy, safety, or property, and/or that of yours or others; and
- (h) to allow us to pursue remedies or limit the damage we may sustain;
- (i) if you and your employer have given consent, LeasePlan can also analyze information about your vehicle(s) if you have previously leased a car from 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, contact information, correspondence with LeasePlan, your use of our Services and any other information mentioned in this Privacy Statement, if this is required for any of the purposes mentioned in the previous paragraph.

⇒ [With whom do we share your personal information?](#)

We only provide your personal information to supervisory, tax and investigative authorities when required to do so by law or a sectorial recommendation to which LeasePlan is subject. See also the section '[Sharing data with third parties](#)'.

4.4 DATA REGARDING PRIVATE LEASE CLIENTS (INCLUDING SOLE TRADERS)

4.4.1 SIGN UP

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

⇒ [What does this purpose entail?](#)

We collect information when you sign up (via our website) as a Client. This processing is required to initiate a possible business relationship and for the making and performance of a contract, which includes assessment, and due diligence for your acceptance as a Client.

⇒ [Which personal information do we process for this purpose?](#)

For this purpose, we process your name, gender, title, address, contact details (including your email address, telephone number, driver license, financial information, to evaluate your capacity to make the contract, vehicle delivery address or pick-up location, transaction data (such as references, amount payable, payment date), your bank account number and the direct debit authorization given to LeasePlan.

⇒ With whom do we share your personal information?

We share your data with third parties to which we subcontract the creation of cash point references for online payments, as initial, monthly, or other services. We only share information necessary for these payments. See also the section 'Sharing data with third parties'.

4.4.1.b Portals and apps

⇒ What does this purpose entail?

We offer you online portals or apps. Via these portals or apps, you can find practical information on your contract, your contact information and other personal information, ask for 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 required for the performance of the lease agreement or done 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 the 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 by email, telephone, via our website). In this case, we process your personal information to respond to your questions/requests. We can also contact you in relation to your lease agreement. This processing is required for the performance of the lease agreement or with your consent.

⇒ Which personal information do we process for this purpose?

For this purpose, we may process your name, contact information, correspondence with LeasePlan regarding your questions/requests and all other personal information you provide to us and/or which is necessary to respond to you appropriately, (incl. your license plate number), the agreed term of the lease agreement and your financial obligations to us. Telephone calls to our customer support service will be recorded for quality monitoring and training purposes, based on our legitimate interest.

⇒ With whom do we share your personal information?

See the 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 a 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 regarding surveys or marketing communication, we will do so either by email or by postal mailings (newsletters/brochures/magazines). To understand what relates to you, we may use manual and automatic tools to analyze your personal information. If you would no longer like to receive surveys or marketing communication from us, please contact us by using the contact form in this Privacy Statement.

To facilitate your use of our online services or applications, we may analyze data 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, email, 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 process your name, your address, your email address, your license plate number, and topics you may be interested in (as indicated by you).

⇒ With whom do we share your personal information?

See the 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, vehicle make and model, service history and operational contact with you. In addition, you may provide certain information regarding vehicle management to us through the LeasePlan portal, or when you call LeasePlan.

⇒ With whom do we share your personal information?

See also the 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, maintenance, and tire Services for your vehicle and to analyze, predict

and proactively refer vehicles to partners that provide these services. We have a legitimate interest related to delivering the Services under a 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, vehicle make and model, service history and operational contact with you. In addition, you may provide certain information to us via 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 tires, such as dealers/garages, body repair shops or car fitters. See also the 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 you and/or your vehicle may have been involved in, to restore mobility and handle damage. We will do so by (i) allowing you 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 process 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.

⇒ Which personal information do we process for this purpose?

For this purpose, we collect the following personal information:

- From ourselves: license plate number, vehicle 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 provide to us regarding the accident (including any information regarding possible injuries).
- From third parties, such as individuals involved in the accident or insurance companies: information provided by third parties involved in the accident/incident (such as the identity of the passengers, driver, and passengers of third-party vehicles, and other third parties involved), information provided by 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 damage or claim resolution. See also the section '[Sharing data with third parties](#)'.

4.4.3.d Fuel Card, EV Charging Card and tolls

⇒ [What does this purpose entail?](#)

Our Services include fuel management, which, for example, allows you to pay for fuel at filling stations using a payment resource issued or managed by LeasePlan. In the case of electric vehicles, we can manage charging and provide a card for use at EV charge stations, and charge station installation services. You can also manage toll payments via our Service. This processing is based on a legitimate purpose regarding the performance of a contract.

⇒ [Which personal information do we process for this purpose?](#)

For this purpose, we collect the following information: your name, email address, fuel card number, e-Mobility card number, car license plate number, fuel or electricity consumption data, mileage, and related costs. We can also collect information regarding toll payments, e.g. regarding the location, date and time and amount of toll payments. If reimbursements occur, we may also need to collect bank account information.

⇒ [With whom do we share your personal information?](#)

LeasePlan needs to share the information with Partners that provide fuel, EV-charging and toll solutions. See also the 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 to process and manage 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 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?](#)

See also the section '[Sharing data with third parties](#)'.

4.4.4 MOBILITY SERVICES

4.4.4.a Rental of vehicles from rent-a-car companies.

⇒ [What purpose does this entail?](#)

We collect your personal information within the scope of vehicle rentals from rent-a-car companies, in order, for example, to contact rent-a-car companies that are partners of LeasePlan via our Customer Service Line and rent a vehicle at the most convenient location, or to arrange the return of a vehicle. This processing is based on a legitimate purpose for the performance of a contract and is related to the provision of services within the ambit of the performance of an operational leasing contract.

⇒ Which personal information do we process for this purpose?

We collect your name, email address, mobile number, car license plate number, associated costs, the delivery location, the rental term.

⇒ With whom do we share your personal information?

We share your information with external rent-a-car companies. See also the section "Sharing data with third parties".

4.4.4b Roadside assistance

⇒ What does this purpose entail?

When you experience a car malfunction, for example, a flat tire or mechanical difficulties while on-the-road, LeasePlan can 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 the section 'Sharing information 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 managing and expanding our business activities.

To facilitate your use of our online services or applications, we may analyze data 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, email, 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 Privacy Statement or otherwise provided to us by you, if required for any of the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

See the 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 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 remedies or limit the damage we may sustain.

⇒ Which personal information do we process for this purpose?

We process the name, contact information, date, place, and country of birth of the counterparty with whom LeasePlan wishes to establish a business relationship, correspondence with LeasePlan, its use of our Services and any other information referred to in this Privacy Statement, if necessary, to comply with any of the purposes in the previous paragraph.

⇒ With whom do we share your personal information?

We only provide your personal information to supervisory, tax and investigative authorities when required to do so by law or a sectorial recommendation to which LeasePlan is subject. See also the section 'Sharing data with third parties'.

4.5 DATA REGARDING PRIVATE BUYERS

4.5.1 PURCHASE

4.5.1.a Purchase of a LeasePlan Used Vehicle

⇒ What does this purpose entail?

We process your information in relation to your (potential) purchase of a LeasePlan used vehicle, 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 making and performance of the agreement, including assessment, due diligence, and 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 the 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 in person, by phone, in writing or 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. We can contact you regarding a (potential) purchase of a vehicle. This processing is based on a legitimate purpose of LeasePlan for the performance of a contract, or with your consent.

⇒ 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) and any other information 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 the 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 a 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 regarding surveys or marketing communication, we will do so either by email or by postal newsletters/brochures/magazines (postal mailings). To understand what relates to you, we may use manual and automatic tools to analyze your personal information. If you would no longer like to receive surveys or marketing communication from us, please contact us by using the contact form in this Privacy Statement.

To facilitate your use of our online Services or applications, we may analyze data 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, email, 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 process your name, your address, your email address, and your interests (as indicated by you).

⇒ With whom do we share your personal information?

See the 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 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, email, 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 Privacy Statement or otherwise provided to us by you, if is required for any of the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

See the 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 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 remedies or limit the damage 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 counterparty with which LeasePlan wishes to make the transaction, correspondence with LeasePlan, use of Services and any other information mentioned in this Privacy Statement, if required for any of the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

We only provide your personal information to supervisory, tax and investigative authorities when required to do so by law or a sectorial recommendation to which LeasePlan is subject. See also the section 'Sharing data with third parties'.

4.6 DATA REGARDING TRADERS

4.6.1 PROFESSIONAL BUYERS OF USED VEHICLES (TRADERS)

4.6.1.a Registration as a professional trader

⇒ What does this purpose entail?

Traders must be registered as professional buyers to buy used LeasePlan vehicles. This processing is based on our legitimate interest and relates to the performance of a contract of sale (which includes assessment, due diligence, and acceptance as a Client) or on a legal obligation.

⇒ Which personal information do we process for this purpose?

For this purpose, we collect your name, business contact details (including your email address, telephone number), your ID and information related to your company including Commercial Registry certificate and beneficial owners registry certificate.

⇒ With whom do we share your personal information?

See the section 'Sharing data with third parties'.

4.6.1.b Purchase of LeasePlan Used Vehicles

⇒ What does this purpose entail?

We process your information in relation to your (potential) purchase of LeasePlan Used Vehicle(s) and other related Services. This includes the performance of the purchase agreement, delivery, and the payment. This processing is based on a legitimate interest of LeasePlan and relates to the making and performance of the contract of sale).

⇒ Which personal information do we process for this purpose?

For this purpose, we collect your name, business contact details, including your email address, telephone number, ID and the details needed to complete the transaction, including bank account details.

⇒ With whom do we share your personal information?

See the 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 in person, by telephone or in writing. We can contact you relating to a (potential) purchase of a vehicle. This processing is based on our legitimate interest, i.e. the performance of a contract 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 regarding your question/request and all other personal information you provide to us and/or which is necessary to respond to you appropriately.

⇒ With whom do we share your personal information?

See the 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 a 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 regarding surveys or marketing communication, we will do so either by email or by postal newsletters/ brochures/magazines (postal mailings). To understand what relates to you, we may use manual and automatic tools to analyze your personal information. If you would no longer like to receive surveys or marketing communication from us, please contact us via the [contact form](#) in this Privacy Statement.

To facilitate your use of our online Services or applications, we may analyze data 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, email, 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 process your name, your address, your email address, and your interests (as indicated by you).

⇒ With whom do we share your personal information?

See the section 'Sharing data with third parties'.

4.6.3 LEASEPLAN BUSINESS PURPOSES

4.6.3.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 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, email, 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 Privacy Statement or otherwise provided to us by you, if such is required for any of the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

See the section 'Sharing data with third parties'.

4.6.3.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 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 remedies or limit the damage 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, if a company occurs 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 in relation to LeasePlan; your correspondence with LeasePlan, your use of Services and any other information mentioned in this Privacy

Statement, if required for any of the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

We only provide your personal information to supervisory, tax and investigative authorities when required to do so by law or a sectorial recommendation to which LeasePlan is subject. See also the section 'Sharing data with third parties'.

4.7 DATA REGARDING SUPPLIERS

4.7.1 SUPPLIER ACCOUNT MANAGEMENT

4.7.1.a To provide, manage and administer the Supplier accounts

⇒ What does this purpose entail?

We collect your information to handle day-to-day management and administration of the Supplier accounts, such as maintaining contracts, and keep you informed of all important developments about the services you provide and other information relevant to the Supplier contract and account. This processing is based on the agreement we have with you 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 Supplier online accounts.

⇒ With whom do we share your personal information?

See the section 'Sharing data with third parties'.

4.7.1.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 use your personal information to respond to your question/request. We can also contact you, for example, regarding day-to-day management and administration of your Supplier account. This processing is based on the agreement we have with you 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 regarding your question/request and all other personal information you provide to us and/or which is necessary to respond to you appropriately.

⇒ With whom do we share your personal information?

See the section 'Sharing data with third parties'.

4.7.1.c For surveys or other (marketing) communication

⇒ What does this purpose entail?

We process your personal information to send you surveys, for which we have a legitimate interest to process these data. We will send these

surveys to you by email or SMS asking for your feedback about our communication and business relationship. With your consent or where we have a legitimate interest, we may send you marketing communication, for example, to keep you updated on events, special offers, possibilities and current and future products and services of LeasePlan. We may also send you such surveys in a periodic email or text message to request your feedback on our communication and relationship. We may also send you postal mailings (newsletters/brochures/magazines). We may also send you newsletters/brochures/magazines by mail.). To understand what relates to you, we may use manual and automatic tools to analyze your personal information. If you would no longer like to receive surveys or marketing communication from us, please contact us by using the contact form in this Privacy Statement.

To facilitate your use of our online Services or applications, we may analyze data 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, email, 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 and your business contact details.

⇒ With whom do we share your personal information?

See the section 'Sharing data with third parties'.

4.7.2 LEASEPLAN PREMISES

4.7.2.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 to ensure appropriate access controls and security, for which we have a 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. We may also process video and/or audio information about you through video/audio recording equipment, such as for instance CCTV.

⇒ With whom do we share your personal information?

See the section 'Sharing data with third parties'.

4.7.3 LEASEPLAN BUSINESS PURPOSES.

4.7.3.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 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, email, 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 Privacy Statement or otherwise provided to us by you, if required for any of the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

See the section 'Sharing data with third parties'.

4.7.3.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 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 remedies or limit the damage 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 counterparty with which LeasePlan wants 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 counterparty; correspondence with LeasePlan, the products or services supplied to us and any other information mentioned in this Privacy Statement, if required for any of the purposes mentioned in the previous paragraph.

⇒ With whom do we share your personal information?

We only provide your personal information to supervisory, tax and investigative authorities when we are required to do so by law or a sectorial recommendation to which LeasePlan is subject. See also the section 'Sharing data with third parties'.

5. Sharing data with third parties

Besides 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 Privacy Statement.**
 - You can consult the list and location of our LeasePlan entities [here](#).
- **To our third-party service partners, providers, to facilitate services they provide to you and us.**
 - 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, rent-a-car companies, fuel and electricity suppliers, EV charge stations, and our driver safety programs trainers. Car dealerships or suppliers of (electric) vehicles may require contact details of a driver to activate a personal account necessary to be set up as a driver, otherwise the vehicle does not work.

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 can include laws outside your country of residence.
- **To cooperate with public and government authorities.**
 - 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 if any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings) occurs. Such third parties may include, for example, an acquiring entity and its advisors.

6. International transfer of personal information

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 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 by using the [contact form](#) in this Privacy Statement.

7. Security and retention

How we secure personal information

We seek to use reasonable organizational, 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 by using the [contact form](#) in this Privacy Statement.

How long we retain personal information

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

The criteria used to determine our retention periods include:

- The 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);

- 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 before we can delete them); or
- Whether retention is advisable considering our legal position (considering statutes of limitation, litigation, or regulatory investigations).

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, or to request an electronic copy of your personal information to transmit it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us by using the contact form. We will respond to your request consistent with applicable law.

In your request, please make clear what personal information your request relates to. For your protection, we will only implement requests regarding the personal information associated with the email address previously indicated and we therefore reserve the right to confirm your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and within any applicable legally required timeframes.

We may need to retain certain information for recordkeeping purposes and/or to complete any transactions that began before 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 questions or complaints about this Privacy Statement, please contact us by using the contact form. As email communications are not always secure, please do not include sensitive information in your emails to us.

Additional information regarding EEA citizenship

You may also:

- Contact our Data Protection Officer by using the contact form or by contacting the LeasePlan Portugal Data Protection Officer at Lagoas Park, Edifício 6, 2740-244 Porto Salvo; or
- Lodge a complaint with the data protection authority of your country or region or where an alleged infringement of data protection law occurs. The supervisory authority in Portugal is the Comissão Nacional de Proteção de Dados, [click here](#) to access its site.

10. Alteration of this Privacy Statement

We reserve the right to alter or update this Privacy Statement. Please look at the 'Last Updated' legend at the top of this document to see when this Privacy Statement was last revised. Use of the Services after these revisions means that you accept the revised Statement.

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