

**Privacy Statement/Clarification Text**

**Last updated: [11 June 2021]** LeasePlan Otomotiv Servis ve Tic. A.Ş. ("LeasePlan Turkey"), 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.

Privacy Pledges LeasePlan

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 make sure to 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 LeasePlan Turkey.

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

**Table of contents**

- 1. Scope of this Privacy Statement**
- 2. Who we are**
- 3. How we collect your data**
- 4. For which purposes we use your data**
  - 4.1 Data pertaining to website visitors
  - 4.2 Data pertaining to business clients
  - 4.3 Data pertaining to drivers (employees of our clients)
  - 4.4 Data pertaining to private lease clients
  - 4.5 Data pertaining to private buyers of used vehicles
  - 4.6 Data pertaining to professional buyers of used vehicles
  - 4.7 Data pertaining to suppliers of goods and services
- 5. Sharing data with third parties**
- 6. International transfer of personal information**
- 7. Security and retention**
- 8. Children's privacy**
- 9. Your rights and contacting us**
- 10. Changes to this Privacy Statement**

## 1. Scope of this Privacy Statement

1. Website visitors/users (“**Website Visitors**”);
2. Business Clients (“**Clients**”);
3. Clients’ employees/drivers (“**Drivers**”);
4. Private lease clients (including one-man businesses) (“**Private Lease Clients**”);
5. Private buyers of used vehicles (“**Buyers**”);
6. Professional buyers of used vehicles (“**Traders**”); and
7. Suppliers of goods and services (“**Suppliers**”).

(or prospects in relation to the above; individually and collectively also referred to as “you”, “your” or “yours”)

We collect and use your personal information through our various vehicle and fleet leasing, management and driver mobility services and in the course of performing our business activities, as further described in Section 1 (“**Services**”). Please note that this Privacy Statement does not apply to the following affiliates and/or services:

- Euro Insurances DAC trading as LeasePlan Insurance or other insurance-related activities;
- PowerD also trading under the name LeasePlan Energy;
- CarNext BV and its affiliates;
- LeasePlan Bank in The Netherlands or in Germany.

The services provided by these affiliates are governed by separate privacy statements.

Please also note that specific services may be subject to a separate privacy statement referenced in the respective terms like the processing of your personal information in relation to our telematics services for which a separate telematics statement is applicable separate.

## 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 Drivers by Clients.

## 2. Who we are

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

**LeasePlan Otomotiv Servis ve Ticaret Anonim Şirketi**

**İstanbul Chamber of Commerce registration number: 488607**

**Ofispark Merkez Mah. Bağlar Cad. No: 14 C Blok K: 5 Kağıthane / İstanbul**

LeasePlan Turkey may share your personal information with LeasePlan Corporation N.V. or LeasePlan Global B.V., in which case these are acting as joint controllers:

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

LeasePlan Turkey and LeasePlan Corporation N.V. and LeasePlan Global B.V. are jointly referred to as “**LeasePlan**” and “**we**”, “**our**” or “**us**”.

### 3. How we collect your data

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

- Offline

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

- From Other Sources

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

- Drivers' employers, if you use a company car;
- The relevant authority (e.g., police) where we are the recipient of traffic fines in relation to your leased vehicle;
- From our independent Service Partners who assist us in providing our leasing and other services to you, including car dealerships, car maintenance providers, body repair shops;
- publicly available databases, from clients, credit reference agencies and other sources;
- Visiting our websites or social media channels;
- joint marketing partners, when they share the information with us; and
- If you connect your social media account to your Services account or where you share information from our websites to your social media platforms, you will share certain personal information from your social media account with us, for example, your name, email address, photo, list of social media contacts, and any other information that may be or you make accessible to us when you connect your social media account to your Services account.

We need to collect personal information in order to provide the requested Services to you 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 provide the Services. If you disclose any personal information relating to other persons to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this 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, in the interests of protecting the security of our communication systems and procedures, and for quality control and staff training purposes.

For example, where we are required by a regulator to record certain telephone lines (as relevant) we will do so. In addition, where appropriate and having regard to applicable data protection law, our monitoring will be to check for inappropriate content in communications. In very limited and 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 have reason to believe that fraud or other crime is being committed, where offences are suspected and where the monitoring is proportionate to the

type of the disciplinary offence, or where we suspect non-compliance with anti-money laundering regulations to which we are subject. In particular, telephone calls may be recorded for these purposes.

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

##### **4.1 DATA PERTAINING TO WEBSITE VISITORS**

###### **4.1.1 WEBSITES**

###### **4.1.1.a To communicate with you**

*What does this purpose entail?*

We collect your information when you contact us via one of our online contact forms, for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for our Services. This processing is done for the performance of an agreement that you have with us, to be able 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 or registration number and any other information that you provide to us in the open field entry of the contact form, where you can, for example, pose your question, describe your suggestion, make a compliment or share a complaint.

*With whom do we share your personal information?*

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

###### **4.1.1.b For surveys or other (marketing) communication**

*What does this purpose entail?*

We process your personal information when 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 in regard of 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 click [here](#) to contact us. Based on your visit to a website of LeasePlan, we can show you personalized advertisements outside the LeasePlan website. To understand what is relevant to you, we can use manual and automatic tools to analyze your personal information.

*Which personal information do we process for this purpose?*

For this purpose, we process your name, your address, your email address and topics you may be interested in (as may be indicated by you on our website).

*With whom do we share your personal information?*

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

###### **4.1.2 SOCIAL MEDIA**

###### **4.1.2.a To facilitate social sharing functionality**

*What does this purpose entail?*

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

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 choose to follow a link to one of our websites.

Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as Facebook, Apple, Twitter, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service

provider or device manufacturer, including any personal information you disclose to other organizations through or in connection with our social media functionalities 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 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 in accordance with our [Cookie Statement](#).

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

##### **4.1.4.a Management reporting**

*What does this purpose entail?*

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

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

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

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

*What does this purpose entail?*

To comply with a legal obligation or where we have a legitimate interest, we process your personal information as appropriate or necessary:

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

*Which personal information do we process for this purpose?*

For this purpose, we process your name, your contact information, your correspondence with LeasePlan, your use of any of our Services and any other information mentioned in this Privacy Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

*With whom do we share your personal information?*

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

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

### **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 maintaining contracts and keep you informed of all important developments concerning the Services and other information which is relevant for the Client contract and account. This processing is based on the performance of the lease agreement that 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, digital signature user data such as name, surname, e-mail address and log-in details to our Client online accounts.

*With whom do we share your personal information?*

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

#### **4.2.1.b To communicate with you**

*What does this purpose entail?*

You can contact us by various means (such as email or telephone, whatsapp or via our website). In this case we will use your personal information to answer your question/request. We can also contact you, for example, regarding day-to-day management and administration of your Client account. This processing is based on our legitimate business interest and relates to the performance of the lease agreement that 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 pertaining to your question/request and all other personal information you provide to us and/or which is necessary to appropriately respond to you.

*With whom do we share your personal information?*

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

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

*What does this purpose entail?*

We process your personal information to send you surveys, 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, for example, to keep you updated on events, special offers, possibilities and current and future products and services of LeasePlan. We will send you such surveys in the form of either a periodic email or an email to request your feedback on our Services and other services performed on the vehicle. We may also send you postal mailings (newsletters/brochures/magazines). To understand what is relevant to you, we can 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 click [here](#) to contact us.

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

*Which personal information do we process for this purpose?*

For this purpose, we may process your name and your business contact details.

*With whom do we share your personal information?*

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

### **4.2.2 LEASEPLAN PREMISES**

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

*What does this purpose entail?*

We may process your personal information when you visit us on our premises for the purpose of ensuring appropriate access controls and security, for which we have 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 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'. Clients' contact persons can log onto these tools to review the status of their fleet, damage reporting, contract management and to use other fleet reporting functionalities, such as dashboard reporting, trend analysis reporting, vehicle mileage and end of lease term. This processing is done based on our legitimate interest and relates to the performance of the lease agreement that 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 login details (e.g., username and password).

*With whom do we share your personal information?*

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

#### 4.2.4 LEASEPLAN BUSINESS PURPOSES

##### 4.2.4.a 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 that we collect when using our digital media and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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



#### 4.2.4.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 available remedies or limit the damages that we may sustain.

##### *Which personal information do we process for this purpose?*

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

##### *With whom do we share your personal information?*

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

### 4.3 DATA PERTAINING TO DRIVERS (EMPLOYEES OF OUR CLIENTS)

#### 4.3.1 DRIVER CONTACT

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

##### *What does this purpose entail?*

You can contact us by various means (such as email or telephone, whatsapp or via our website). In this case we will use your personal information to answer your question/request. We can also contact you in relation to your vehicle or other relevant driver-related issues. In relation to you this processing is based on our legitimate interest and is part of delivering the Services to you and your employer under the lease agreement that we have with your employer) or with your consent.

##### *Which personal information do we process for this purpose?*

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

##### *With whom do we share your personal information?*

See section [‘Sharing data with third parties’](#).

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

##### *What does this purpose entail?*

We process your personal information when we send you periodic surveys to request your feedback on our Services and other services performed on the vehicle, for which we have 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 in regard of surveys or marketing communication, we will do so either by email or by postal mailings (newsletters/brochures/magazines). To understand what is relevant to you, we can 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 via the contact form.

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

#### **4.3.2 VEHICLE SERVICES**

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

*What does this purpose entail?*

We process your information in relation to administering your use of the vehicle and to handle the day-to-day management of the vehicle, for which we have a legitimate interest, and this is also related to delivering the Services to you and your employer under the lease agreement that we have with your employer).

*Which personal information do we process for this purpose?*

For this purpose, we process your name, address, (company) email address, lease category, license plate number, make and model, service history and operational contact with you. In addition, you may provide certain information pertaining to vehicle management to us through the LeasePlan portal, <https://www.leaseplan.com/tr-tr/> or when you call LeasePlan.

*With whom do we share your personal information?*

We share information pertaining to management of the vehicle with our Clients (your employer). See also section '[Sharing data with third parties](#)'.

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

*What does this purpose entail?*

We process your information in relation to providing (scheduled) repair and maintenance Services and tires Services and to analyze, predict and pro-actively steer on maintenance and repairs. for your vehicle, for which we have a legitimate interest, and this is also related to delivering the Services to you and your employer under the performance of the lease agreement that we have with your employer.

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

We share information with our Clients (your employer) and with third parties performing maintenance/repair on the vehicle or changing or replacing tires, such as dealers/garages, body repair shops or car fitters. See also section

[Sharing data with third parties](#)'.

##### **4.3.2.c Accident management**

*What does this purpose entail?*

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

*Which personal information do we process for this purpose?*

For this purpose, we collect the following personal information:

- Ourselves: license plate number, make and model, service history and operational contact with you.
- From you: your name, contact details, vehicle details, accident details, damage details, photos of the incident, date of birth, number of passengers in the vehicle, information of witnesses to the accident (if applicable)

and any other information you choose to provide to us in the context of the accident (including any information pertaining to possible injuries).

- From third parties, such as individuals involved in the accident or insurance companies: information of third parties involved in the accident/incident (such as the identity of your passengers, driver and passengers of third-party vehicles, and other third parties involved), information of other third parties (such as witnesses, investigating police officers and others) insurance information, information about the incident and third-party claims.
- From authorities (such as police): your name, address, license plate number, information regarding the accident, police reports and witness statements.

*With whom do we share your personal information?*

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

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

*What does this purpose entail?*

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

We process your personal information for the purpose of processing and managing the payment of the fine and, if applicable, obtaining reimbursement from our Client (your employer), for which we have a legitimate interest to process these data.

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

LeasePlan may need to share this information with our Client (your employer) in certain situations, for example, when leased vehicles are used in carpools and LeasePlan does not know who the actual driver of a specific vehicle is. See also section '[Sharing data with third parties](#)'.

#### **4.3.2.e Fuel card, 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. In case you have an Electric Vehicle, you may be provided with an EV charging card for charging 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 to you and your employer under the performance of the lease agreement that we have with your employer).

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

*Which personal information do we process for this purpose?*

For this purpose, we collect the following information: your name, 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. In case of re-imbursements, 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 Clients (your employer) may have access to certain personal information made available by us on our Internet or 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). Via MyFleet Clients can also request fuel cards or EV charging cards. See also section '[Sharing data with third parties](#)'.

### 4.3.3 MOBILITY SERVICES

#### 4.3.3.a Renting

*What does this purpose entail?*

We collect your personal information to provide our rental program services, so that you can, for example, reach LeasePlan's rental specialists through e-mail, telephone, web site, 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 to you and your employer under the performance of the lease agreement that we have with your employer) or if applicable the agreement that you have with us.

*Which personal information do we process for this purpose?*

For this purpose, we collect: your name, email, mobile phone number, car license plate number, related costs, delivery location, rental time and company contact person.

*With whom do we share your personal information?*

We share your data with LeasePlan's (external) rental specialists. See also section ['Sharing data with third parties'](#).

#### 4.3.3.b Roadside assistance

*What does this purpose entail?*

When you experience a car malfunction, for example, a flat tire or mechanical difficulties while on the road, LeasePlan is able to arrange roadside assistance, for which we work closely with contracted third parties. This processing is based on our legitimate interest and is also related to delivering the Service to you and your employer under the performance of the lease agreement that we have with your employer).

*Which personal information do we process for this purpose?*

For this purpose, we collect the following information: your name, email address, mobile phone number, license plate number and location of where assistance was needed and provided.

*With whom do we share your personal information?*

We share your information with third parties providing on the road repair services, towing services or a replacement car. See also section ['Sharing data with third parties'](#).

### 4.3.4 DRIVER SAFETY PROGRAM

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

*What does this purpose entail?*

We provide various driver safety and risk management training programs in order to 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), trainings that have been recommended, signed up for and completed. This processing is based on our legitimate interest and is also related to delivering the Service to you and your employer under the performance of the lease agreement that we have with your employer) or on 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, (company) email address and license plate number.
- From third parties engaged by us: driver risk index, trainings recommended, trainings signed up for, and trainings completed.

*With whom do we share your personal information?*

We share your information with third parties engaged by us to administer and execute the driver safety programs, as well as with our Clients (your employer). See also section ['Sharing data with third parties'](#).

### 4.3.5 ONLINE PORTALS AND APPS

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

*What does this purpose entail?*

Depending on the country you live in, we provide online portals and apps that have a number of functionalities. For example, through our portals and apps you can find practical information about your lease vehicle, change your name, contact details and other personal information, report damage to your vehicle, schedule appointments for repairs, maintenance or changing tires through online appointment planners, contact our Driver Contact Centers, view and pay fines claim (fuel) expenses and, in case you have an electric vehicle, manage charging.

We may also provide you with dashboard-type overview that can provide you insight into your use of the vehicle (such as your average fuel efficiency, your damages, etc.). This processing is based on our legitimate interest and this is also related to delivering the Service to you and your employer under the performance of the lease agreement that we have with your employer or with your consent.

*Which personal information do we process for this purpose?*

We receive your name and email address from your employer (our Client) to provide you with LeasePlan generated log-in data (username and temporary password) so that you can access our various online portals and apps.

*With whom do we share your personal information?*

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

**4.3.5.b MyFleet***What does this purpose entail?*

MyFleet entails dashboard reporting on a country and/or international level to our Clients (your employer). MyFleet allows Clients for instance to access and evaluate the mileage or the remaining lease period of (individual) vehicles. We also use the data contained in 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) for the purpose of implementing a balanced fleet management approach (cost, environment and safety), managing fleet policy implementation, having the ability to report on global carbon emission as part of the Client's corporate social responsibility obligations and compliance, assessing the effectiveness of policy changes and proactively communicating relevant fleet developments. This processing is based on our legitimate interest and is also related to delivering the Service to you and your employer under the performance of the lease agreement that we have with your employer).

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

*Which personal information do we process for this purpose?*

For this purpose, we may process the following personal information:

- From our Client (your employer): Driver name, Client-generated Driver ID, name and contact details of Client's contact person, (email) address, telephone number, nationality, social insurance number (optional: only if required by applicable law or for fiscal purposes) and use of fuel card (optional).
- Ourselves: vehicle details (e.g., make, model, registration number, license plate number), remaining contract duration, damages sustained by a vehicle, fuel type, number and type of fuel card, fuel consumption and insurance data.
- From Driver: mileage and description of damages sustained by a vehicle involved in a car accident.
- Data received from others (such as police, local municipalities, service garage/center): traffic and/or parking fines, mileage and information on vehicle maintenance and repairs.

*With whom do we share your personal information?*

We share this information with the authorized (International) Fleet Manager of the Client. See also section '[Sharing data with third parties](#)'.

**4.3.6 LEASEPLAN BUSINESS PURPOSES****4.3.6.a Management reporting***What does this purpose entail?*

We 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 that we collect when using our digital media and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

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

*What does this purpose entail?*

To comply with a legal obligation or where we have a legitimate interest, we 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 available remedies or limit the damages that we may sustain. If you and your employer have given consent, LeasePlan can also analyze information about your vehicle(s) if you have already leased a car via LeasePlan, for example to determine the lease price of your new lease car.

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

### **4.4 DATA PERTAINING TO PRIVATE LEASE CLIENTS (INCLUDING SOLE TRADERS AND PARTNERSHIPS) AND PROSPECTIVE CLIENTS**

#### **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 or if you reach us by e-mail or telephone. This processing is required for the conclusion and performance of the lease agreement, including assessment, identifying and acceptance of you as a client and any credit checks.

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

#### **4.4.1.b Portals and apps**

*What does this purpose entail?*

Depending on the country you live in, we offer you online portals or apps. Via these portals or apps, you can find practical information on your lease car, your contact information and other personal information, report changes thereto, report damage to your vehicle, record appointments for repairs, maintenance or tire change, contact our customer service, consult and pay fines. This processing is 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 section '[Sharing data with third parties](#)'.

#### **4.4.2 CONTACT**

##### **4.4.2.a To communicate with you**

*What does this purpose entail?*

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

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

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

*What does this purpose entail?*

We process your personal information when we send you periodic surveys to request your feedback on our Services and other services performed on the vehicle, for which we have 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 in regard of surveys or marketing communication, we will do so either by email or by postal mailings (newsletters/brochures/magazines). To understand what is relevant to you, we can 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 click to contact us. to contact us.

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

#### **4.4.3 VEHICLE SERVICES**

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

*What does this purpose entail?*

We process your information in relation to administering your use of the vehicle and to handle the day-to-day management of the vehicle. This processing is required for performance of the lease agreement.

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

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

*What does this purpose entail?*

We process your information in relation to providing (scheduled) repair and maintenance Services and tires Services for your vehicle and to analyze, predict and pro-actively steer on maintenance and repairs. For this processing we have a legitimate business interest and is required for performance of the lease agreement.

*Which personal information do we process for this purpose?*

For this purpose, we collect your name, address, (company) email address, license plate number, make and model, service history and operational contact with you. In addition, you may provide certain information to us through the LeasePlan portal (e.g., your phone number to make an appointment for maintenance of the car), or when you call LeasePlan or reach out us via whatsapp.

*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 section '[Sharing data with third parties](#)'.

#### **4.4.3.c Accident management**

*What does this purpose entail?*

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

*Which personal information do we process for this purpose?*

For this purpose, we collect the following personal information:

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

*With whom do we share your personal information?*

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

#### **4.4.3.d EV Charging Card**

*What does this purpose entail?*



In case you have an Electric Vehicle, you may be provided with a charging card for charging your vehicle at charge points. This processing is required for the performance of the agreement. In addition, we may provide services in relation to placing a charging point.

*Which personal information do we process for this purpose?*

For this purpose, we collect the following information: your name, email address, e-Mobility card number, car license plate number, mileage and related costs. In case of re-imburements, we may also need to collect bank account information.

*With whom do we share your personal information?*

LeasePlan needs to share the information with the E-Charging solution company/payment company. See also section '[Sharing data with third parties](#)'.

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

*What does this purpose entail?*

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

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

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

#### **4.4.4 MOBILITY SERVICES**

##### **4.4.4a 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 is able to arrange roadside assistance, for which we work closely with contracted third parties. This processing is required for the performance of the lease agreement.

*Which personal information do we process for this purpose?*

For this purpose, we collect the following information: your name, email, mobile phone number, license plate number and location of where assistance was needed and provided.

*With whom do we share your personal information?*

We share your information with third parties providing on the road repair services, towing services or a replacement car. See also section '[Sharing data with third parties](#)'.

#### **4.4.5 LEASEPLAN BUSINESS PURPOSES**

##### **4.4.5.a Management reporting**

*What does this purpose entail?*

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

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

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

**4.4.5.b Compliance with laws and legal obligations and protection of LeasePlan assets and interests***What does this purpose entail?*

To comply with a legal obligation or where we have a legitimate interest, we process your personal information as appropriate or necessary:

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

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

**4.5 Data pertaining to private buyers of used vehicles****4.5.1 PURCHASE****4.5.1.a Purchase of a LeasePlan Occasion***What does this purpose entail?*

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

*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. In case the transaction is carried out by proxy, your address etc. and your identity information that are included in the power of attorney can be processed.

*With whom do we share your personal information?*

We may share this information with trade in parties or financial services partners. See also section '[Sharing data with third parties](#)'.

**4.5.2 BUYER CONTACT****4.5.2.a To communicate with you***What does this purpose entail?*

We collect your information when you contact us via one of our online contact forms (or provide information in one of our occasion centers), for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for our Services. We can contact you relating to a (potential) purchase of a vehicle. This processing is required for the performance of the agreement that you have with us or with your consent.

*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 that you provide to us in the open field entry of the contact form, where you can, for example, pose your question, describe your suggestion, make a compliment or share a complaint.

*With whom do we share your personal information?*

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

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

*What does this purpose entail?*

We process your personal information when we send you a survey to request your feedback on our Services, for which we have 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 in regard of surveys or marketing communication, we will do so either by email or by postal newsletters/brochures/magazines (postal mailings). To understand what is relevant to you, we can 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 do~~ to contact us. to contact us.

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

#### **4.5.3 LEASEPLAN BUSINESS PURPOSES**

##### **4.5.3.a Management reporting**

*What does this purpose entail?*

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

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

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

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

*What does this purpose entail?*

To comply with a legal obligation or where we have a legitimate interest we process your personal information as appropriate or necessary:

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g., counterparty due diligence, money laundering, financing of terrorism and other crimes);
- (b) to comply with legal process;

- (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (d) to enforce our terms and conditions and other applicable policies;
- (e) to protect our operations;
- (f) to protect our rights, privacy, safety or property, and/or that of yours or others; and
- (g) to allow us to pursue available remedies or limit the damages that we may sustain.

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

#### **4.6 Data pertaining to professional buyers of used vehicles (Traders)**

##### **4.6.1 REGISTRATION AND PURCHASE**

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

*What does this purpose entail?*

To be able to purchase LeasePlan Occasion on an auction or purchase a vehicle via our one of our car remarketing websites, traders need to be registered with LeasePlan as a professional trader. This processing is based on our legitimate interest (and also relates to the providing of Services under the performance of an agreement, including assessment, acceptance or credit checks) or based on a legal obligation.

*Which personal information do we process for this purpose?*

For this purpose, we collect your name, contact details (including your email address, telephone number), your ID and information related to your company including Chamber of Commerce document and VAT certificate,

*With whom do we share your personal information?*

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

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

*What does this purpose entail?*

We process your information in relation to your (potential) purchase of LeasePlan occasion(s) and other related Services via an auction or via our car remarketing website, this includes the execution of the purchase agreement, the delivery and the settlement of the payment transaction. This processing is based on legitimate interest (and also relates to the providing of Services under the conclusion and performance of the purchase agreement).

*Which personal information do we process for this purpose?*

For this purpose, we collect your name, contact details (including your email address, telephone number), your ID and information related to your company including Chamber of Commerce document and VAT certificate, details needed to complete the transaction, including bank account details. In case the transaction is carried out by proxy, your address etc. and your identity information that are included in the power of attorney can be processed.

*With whom do we share your personal information?*

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

##### **4.6.2 TRADER CONTACT**

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

*What does this purpose entail?*

We collect your information when you contact us via one of our online contact forms (or provide information in one of our occasion centers), for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for our Services. We can contact you relating to a (potential) purchase of a vehicle. This

processing is based on our legitimate interest (and also relates to the providing of Services under the performance of the agreement that we have with the Trader) or with your consent.

*Which personal information do we process for this purpose?*

For this purpose, we may process your name, your business contact details, your correspondence with LeasePlan pertaining to your question/request and all other personal information you provide to us and/or which is necessary to appropriately respond to you.

*With whom do we share your personal information?*

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

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

*What does this purpose entail?*

We process your personal information when we send you a survey to request your feedback on our Services for which we have 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 in regard of surveys or marketing communication, we will do so either by email or by postal newsletters/ brochures/magazines (postal mailings). If you would no longer like to receive surveys or marketing communication from us, please click [here](#) to contact us.

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

#### **4.6.3 LEASEPLAN BUSINESS PURPOSES**

##### **4.6.3. a Management reporting**

*What does this purpose entail?*

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

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

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

##### **4.6.3.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 available remedies or limit the damages that we may sustain.

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

#### **4.7 Data pertaining to suppliers**

##### **4.7.1 SUPPLIER ACCOUNT MANAGEMENT**

###### **4.7.1.a To provide, manage and administer the Supplier account**

*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 concerning the services you render and other information which is relevant for the Supplier contract and account. This processing is based on the agreement that 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 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 answer 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 that 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 pertaining to your question/request and all other personal information you provide to us and/or which is necessary to appropriately respond to you.

*With whom do we share your personal information?*

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

###### **4.7.1.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. 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 send you such surveys in the form of either a periodic email or an email to request your feedback on our communication and relationship. We may also send you postal mailings (newsletters/brochures/magazines). If you would no longer like to receive surveys or marketing communication from us, please click [here](#) to contact us.

*Which personal information do we process for this purpose?*

For this purpose, we may process your name and your business contact details.

*With whom do we share your personal information?*

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

#### 4.7.2. 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 for the purpose of ensuring 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 section '[Sharing data with third parties](#)'.

#### 4.7.3 SUPPLIER REPORTING

##### 4.7.3.a MyFleet

*What does this purpose entail?*

We provide the online reporting tool 'MyFleet'. Clients' contact persons can log onto these tools to review the status of their fleet, and to use other fleet reporting functionalities, such as dashboard reporting, trend analysis reporting, vehicle mileage and end of lease term. This processing is based on our legitimate interest (and also relates to the providing of Services under the performance of the lease agreement that we have with the Client).

*Which personal information do we process for this purpose?*

For this purpose, we collect contact details and job function (e.g., (International) Fleet Manager) of Client's contact person, and login details (e.g., username and password).

*With whom do we share your personal information?*

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

#### 4.7.4 LEASEPLAN BUSINESS PURPOSES.

##### 4.7.4. a Management reporting

*What does this purpose entail?*

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

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

*Which personal information do we process for this purpose?*

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

*With whom do we share your personal information?*

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

**4.7.4.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 available remedies or limit the damages that we may sustain.

*Which personal information do we process for this purpose?*

For this purpose, we process the name, contact information, the date, place and country of birth of the ultimate beneficial owner of the counterparty that LeasePlan want to do business with; we may also process the name, address and the date, place and country of birth of the person(s) who represent the counterparty towards LeasePlan; your correspondence with LeasePlan, the services you render and any other information mentioned in this Privacy Statement, if such is required for one of the purposes mentioned in the previous paragraph.

*With whom do we share your personal information?*

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

**5. Sharing data with third parties**

Pursuant to Articles 8 and 9 of the Personal Data Protection Law; in addition to what is indicated for each purpose above regarding sharing of personal information, we may also share personal information:

- **Within the LeasePlan group for the purposes described in this 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.**

In order to provide you with our services, we often work closely with Service Partners and Service Providers. Our independent Service Partners assist us in providing our leasing and other services to you, and include car dealerships, car maintenance providers, body repair shops, and roadside assistance providers, but also rental service companies and the administrators of our driver safety programs. 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 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 in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.

## 6. International transfer of personal information

Within our company, your personal data can only be accessed by our employees who have limited authorization for the purposes detailed above. On the other hand, your collected personal data can be transferred if it is compulsory for the data controller to fulfill its legal obligation in accordance with Articles 8 and 9 of the Personal Data Protection Law, data processing is mandatory for the establishment, use or protection of a right, provided that it does not harm the fundamental rights and freedoms of the person concerned, within the scope of explicit consent personal data processing conditions (legal reasons), if data processing is mandatory and exists for the legitimate interests of the data controller:

- Our group companies for the purposes of planning or performing communication, audit and reporting activities,
- Potential buyers, sellers or other parties of the transaction and their employees, consultants and database service providers involved in the process, for the purpose of carrying out the legal and financial investigation activities of our Company in case of possible mergers, acquisitions, joint ventures, divisions and other structural changes.

## 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 in accordance with the [Contact details](#) provided in this Privacy Statement.

### - How long we retain personal information

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

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you use a LeasePlan vehicle);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, 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 if you would like to request to receive an electronic copy of your personal information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us via the [link](#) available on the local website of the relevant LeasePlan entity to exercise your rights. We will respond to your request consistent with applicable law.

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

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

As a personal data owner, we declare that you have the following rights in accordance with Article 11 of the Personal Data Protection Law:

- Learning whether your personal data is processed or not,
- Requesting information if your personal data has been processed,
- Learning the purpose of processing your personal data and whether they are used appropriately for their purpose,
- To know the third parties in the country or abroad to whom your personal data has been transferred,
- To request correction of your personal data if it is incomplete or incorrectly processed, and to request notification of the transaction made within this scope to third parties to whom your personal data has been transferred,
- To request the deletion or destruction of your personal data in the event that the reasons requiring its processing disappear, despite the fact that it has been processed in accordance with the provisions of the law and other relevant laws, and within this scope, and in case your personal data are processed incompletely or incorrectly, to request notification of the transactions made to the third parties to whom your personal data has been transferred.
- Object to the occurrence of a result against the person himself by analyzing your processed data exclusively through automated systems,
- Request compensation in case you suffer damage due to unlawful processing of your personal data,

You can submit your applications regarding your above-mentioned rights to our Company by filling the [Relevant Person Application Form](#) in accordance with the provisions of the Communiqué on Application Procedures and Principles to the Data Controller (in writing or via registered electronic mail (KEP) address, secure electronic signature, mobile signature or your e-mail address registered in our systems and that you have previously notified to our Company, With the information / documents \* confirming your identity in order to enable our Company to electronically determine that you are the real rightful owner (TR ID number or passport number for citizens of other countries, address / workplace address for notification, mobile phone / telephone / fax number, e-mail address. etc.) together)

### Questions?

If you have any questions or complaints about this Privacy Statement, please contact us via the [link](#) available on the local website of LeasePlan Turkey to exercise your rights. Because email communications are not always secure, please do not include sensitive information in your emails to us.

**Additional information regarding EEA citizen**

You may also:

- Contact our Data Privacy Office via the [link](#) available on the local website of the relevant LeasePlan entity to exercise your rights. Alternatively, you may contact our corporate headquarters via: LeasePlan Corporation N.V., attn. Data Protection Officer, Gustav Mahlerlaan 360, 1082 ME Amsterdam, the Netherlands; or
- Lodge a complaint with a data protection authority of your country or region or where an alleged infringement of applicable data protection law occurs.

**10. Changes to this Privacy Statement**

We reserve the right to change or update this Privacy Statement at any time. However, this is only done in accordance with the applicable law. Please take a look at the 'Last Updated' legend at the top of this document to see when this Privacy Statement was last revised. Any changes to this Privacy Statement will become effective when we post the revised Statement on the Services.