

LeasePlan Services

Last updated: March, 2016

Our services

LeasePlan Portugal is a car leasing company and therefore most of the data we process are in relation to the vehicle management services we provide to you as the driver and to your employer if you have a company car. This starts with the registration of your leased vehicle, 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 fuel card services, car rental services, and roadside assistance. Note that we continuously try to improve our services and your user experience, by implementing innovations, such as telematics services which enable drivers to benchmark their fuel use consumption and driver behavior.

In order to provide you with our services, we often work closely with Service Partners and Service Providers. Our Service Partners assist us in providing our leasing and other services to you, and include car dealerships, car maintenance providers, body repair shops, and roadside assistance providers, but also rental service companies, and the administrators of our driver safety programs. Service Providers are companies we retain that support us in running our business, for example to help us maintain our IT network and related infrastructure, and security and access controls to our premises.

How do we receive and process your information?

There are a variety of ways in which we come into the possession of your personal information, such as when you start using your leased vehicles (either through your employer or through private lease), when you visit our website, or otherwise interact with us. Data may come from you directly, e.g. when you contact us in relation to roadside assistance or to report an accident involving your leased vehicle or when you respond to our surveys. When you have received your leased vehicle in the context of your employment, we may also receive information from your employer, such as your basic contact information and your lease category. When you have engaged with one of our Service Partners, we may receive information back from them such as when your vehicle has been repaired, when you have participated in a driver safety program or when you have rented a car through our program.

LeasePlan Privacy Pledges

Regardless of when and how we process your personal information:

- **Transparency:**

we will tell you how we collect your information and for what purposes we use your information

- **Proportionality:**

- We process your information only to the extent necessary for the provision of the relevant LeasePlan service provided to you and your employer (if applicable)
- We allow our staff access your information on a need-to-know basis only
- We provide your information to Service Partners and Providers only to the extent necessary for delivering the relevant services (e.g. scheduling repair and maintenance, providing emergency assistance). We will put in place (contractual) arrangements that are aimed at ensuring that our Service Partners treat your information no less stringent than we do

- **Adequate security:**

- We treat your information as strictly confidential and we take appropriate technical and organizational security measures to protect your information against loss or unlawful processing.
- Where we outsource a data processing we impose contractual obligations to protect your information

- **Choice:**

- We will ask your consent before using your information for purposes other than pertaining to the delivery of the services.
- We will make it easy for you to indicate if you do not (or no longer) wish to receive our marketing messages by providing you with an easy opportunity to opt-out before sending any direct email on our products and services, as well as in every direct email we send. If you opt-out we may still communicate with you via e-mail regarding the delivery of the services.

- **Data transfers:**

LeasePlan being a global company your information may be transferred also to other LeasePlan entities, some of which may be in countries that do not provide adequate protection to personal data. We ensure that your personal information is treated with a high level of protection throughout the LeasePlan group. To that end, LeasePlan has implemented the [LeasePlan Binding Corporate Rules http://ec.europa.eu/justice/data-protection/international-transfers/binding-corporate-rules/bcr_cooperation/index_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/binding-corporate-rules/bcr_cooperation/index_en.htm), which ensure that every LeasePlan entity worldwide applies the same high level of protection to personal information.

- **Control:**

You will always be provided with an easy manner to access, correct and delete your information.

If you would like to know about our privacy practices in more detail, please read our [Privacy Statement](#) so that you understand how we collect and use your personal data.

LeasePlan **Global** Privacy Statement

Last updated: March, 2016

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

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

Scope of this Privacy Statement

This Privacy Statement ("Statement") describes our practices in connection with personal information that we collect from:

- I. Website visitors/users ("Website Visitors");
- II. Business clients ("Clients");
- III. Clients' employees/drivers ("Drivers").
(Individually and collectively also referred to as "you")

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

Responsibilities of Clients

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

Who is the controller of your personal information?

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

Address: Edificio 6, Lagoas Park 2740-244 Porto Salvo

Sometimes LeasePlan Corporation N.V. is a joint controller:

Address: P.J. Oudweg 41, 1314 CJ Almere, the Netherlands,

LeasePlan Portugal and LeasePlan Corporation N.V. are jointly referred to as “**LeasePlan**” and “**we**”.

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1. For which purposes do we process your personal information?

1.1 DATA PERTAINING TO WEBSITE VISITORS.

1.1.1 WEBSITES

1.1.1.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.

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) 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 2

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

What does this purpose entail?

We process your personal information when we send you periodic surveys to request your feedback on our Services and other services performed on the vehicle. Or when we send you marketing communication, to keep you updated on events, special offers, possibilities and current and future products and services of LeasePlan. When we contact you in regard of surveys or marketing communication, we will do so either by email or by postal newsletters/brochures/magazines (postal mailings). If you would no longer like to receive surveys or marketing communication from us, please contact us via the contact details provided in this Statement.

Which personal information do we process for this purpose?

For this purpose we process your name, your address, your email address and 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 2

1.1 DATA PERTAINING TO WEBSITE VISITORS.

1.1.2 SOCIAL MEDIA

1.1.2.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 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.

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

Which personal information do we process for this purpose?

For this purpose we process your name, email address, photo, list of social media contacts and any other information that may be accessible to us when using social media functionalities.

With whom do we share your personal information?

See section 2

1.1.3 COOKIES AND SIMILAR TECHNOLOGIES

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

1.1 DATA PERTAINING TO WEBSITE VISITORS.

1.1.4 LEASEPLAN BUSINESS PURPOSES

1.1.4.a Management reporting.

What does this purpose entail?

We process personal information for various LeasePlan business-related purposes, 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.

Which personal information do we process for this purpose?

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

With whom do we share your personal information?

See section 2

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

What does this purpose entail?

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

Which personal information do we process for this purpose?

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

With whom do we share your personal information?

Only if we are required to do so by law or sectorial recommendation to which LeasePlan is subject, your personal information will be provided to supervisory agencies, fiscal authorities and investigative agencies.

See also section 2

1.2 DATA PERTAINING TO DRIVERS

1.2.1 DRIVER CONTACT

To communicate with you. What does this purpose entail?

You can contact us by various means (such as email or telephone, or via our website). In this case we will use your personal information to answer your question/request. We can also contact you in relation to your vehicle or other relevant driver-related issues.

Which personal information do we process for this purpose?

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

With whom do we share your personal information?

See section 2

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. Or when we send you marketing communication, to keep you updated on events, special offers, possibilities and current and future products and services of LeasePlan. When we contact you in regard of surveys or marketing communication, we will do so either by email or by postal newsletters/brochures/magazines (postal mailings). If you would no longer like to receive surveys or marketing communication from us, please contact us via the contact details provided in this Statement.

Which personal information do we process for this purpose?

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

With whom do we share your personal information?

See section 2

1.2 DATA PERTAINING TO DRIVERS

1.2.2 PRIVATE LEASE

1.2.2.a To communicate with you.

What does this purpose entail?

You can contact us by various means (such as via email, telephone, our website). In this case we will use your personal information to answer your question/request. We can also contact you in relation to the private lease contract.

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 2

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. Or when we send you marketing communication, to keep you updated on events, special offers, possibilities and current and future products and services of LeasePlan. When we contact you in regard of surveys or marketing communication, we will do so either by email or by postal newsletters/brochures/magazines (postal mailings). If you would no longer like to receive surveys or marketing communication from us, please contact us via the contact details provided in this Statement.

Which personal information do we process for this purpose?

For this purpose we process your name, your address, your email address, 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 2

1.2 DATA PERTAINING TO DRIVERS

1.2.3 VEHICLE SERVICES.

1.2.3.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.

Which personal information do we process for this purpose?

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

With whom do we share your personal information?

We share information pertaining to management of the vehicle with our Clients (your employer).

See also section 2

1.2.3.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.

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 2

1.2 DATA PERTAINING TO DRIVERS

1.2.3.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. We may also use this information for assessing damage repairs under our damage handling and risk retention policies.

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

See also section 2

1.2 DATA PERTAINING TO DRIVERS

1.2.3.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).

Which personal information do we process for this purpose?

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

With whom do we share your personal information?

LeasePlan may need to share this information with our Client (your employer) in certain situations, for example, when leased vehicles are used in carpools and LeasePlan does not know who the actual driver of a specific vehicle is.

See also section 2

1.2.3.e Fuel card and tolls.

What does this purpose entail?

Our Services includes 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. As for the toll contract, it will allow you a more efficient driving without stops with delayed payment of this kind of costs.

Which personal information do we process for this purpose?

For this purpose we collect the following information: your name, email, fuel card number, car license plate number, fuel information, mileage and related costs. In case of toll contract also location and time will be recorded as well as any related costs.

With whom do we share your personal information?

Our Clients (your employer) may have access to certain personal information made available by us on our Internet portal/online reporting tool "FleetReporting". Clients can log in and review the status of their fleet (e.g., mileage), and use other fleet reporting functionalities (e.g., dashboard reporting on fuel consumption and fuel price and trend analysis reporting).

See also section 2

1.2 DATA PERTAINING TO DRIVERS

1.2.4 MOBILITY SERVICES

1.2.4.a Renting.

What does this purpose entail?

We collect your personal information to provide our rental program services, so that you can, for example, reach LeasePlan's rental specialists through our Customer Contact Center, rent a vehicle from the most appropriate rental location or have a rental vehicle delivered to you.

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 2

1.2.4.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.

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 2

1.2 DATA PERTAINING TO DRIVERS

1.2.5 DRIVER SAFETY PROGRAM

1.2.5.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 your company's proactive commitment to safety and good corporate citizenship, decrease accident rates, validate the effectiveness of your company's overall safety initiatives and identify communication and training opportunities. We engage third parties for administering and executing such safety programs, who will contact you to initiate a safety assessment and provide the actual training courses (either online or in a classroom setting). We receive back from these third parties your "driver risk index" (information about potential risks identified through questionnaire processes), trainings that have been recommended, signed up for and completed.

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 2

1.2 DATA PERTAINING TO DRIVERS

1.2.6 ONLINE PORTALS AND APPS.

1.2.6.a Various portals and apps for drivers.

What does this purpose entail?

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, and claim (fuel) expenses. 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.).

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 2

1.2.6.b (International) FleetReporting.

What does this purpose entail?

(International) FleetReporting entails dashboard reporting on a country and/or international level to our Clients (your employer). (International) Fleet Reporting allows Clients for instance to access and evaluate the mileage or the remaining lease period of (individual) vehicles. We also use the data contained in the FleetReporting tool to provide (aggregated) insights to our Clients (your employer) into key aspects of their country's fleet management (such as cost and risk issues) for the purpose of implementing a balanced fleet management approach (cost, environment and safety), managing fleet policy implementation and compliance, assessing the effectiveness of policy changes and proactively communicating relevant fleet developments.

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.

1.2 DATA PERTAINING TO DRIVERS

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 2

1.2 DATA PERTAINING TO DRIVERS

1.2.7 LEASEPLAN BUSINESS PURPOSES.

1.2.7.a Management reporting.

What does this purpose entail?

We will process your personal information for various business purposes, such as data analysis, audits, developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

Which personal information do we process for this purpose?

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

With whom do we share your personal information?

See section 2

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

What does this purpose entail?

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

Which personal information do we process for this purpose?

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

With whom do we share your personal information?

Only if we are required to do so by law or sectorial recommendation to which LeasePlan is subject, your personal information will be provided to supervisory agencies, fiscal authorities and investigative agencies.

See also section 2

1.3 DATA PERTAINING TO CLIENTS

1.3.1 CLIENT ACCOUNT MANAGEMENT.

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

What does this purpose entail?

We collect your 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.

Which personal information do we process for this purpose?

For this purpose we may process business contact details and log-in details to our Client online accounts.

With whom do we share your personal information?

See section 2

1.3.1.b To communicate with you.

What does this purpose entail?

You can contact us by various means (such as email or telephone, or via our website). In this case we will use your personal information to answer your question/request. We can also contact you, for example, regarding day-to-day management and administration of your Client account.

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 2

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

What does this purpose entail?

We will process your personal information to send you surveys and other communications, for example, to keep you updated on events, special offers, possibilities and current and future products and services of LeasePlan. We will send you such surveys in the form of either a periodic email or an email to request your feedback on our Services and other services performed on the vehicle. We may also send you postal newsletters/brochures/magazines (postal mailings).

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 2

1.3 DATA PERTAINING TO CLIENTS

1.3.2 LEASEPLAN PREMISES

1.3.2.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.

Which personal information do we process for this purpose?

For this purpose we may process your name, your contact information and the person you are visiting.

With whom do we share your personal information?

See section 2

1.3.3 CLIENT REPORTING.

1.3.3.a FleetReporting and International FleetReporting.

What does this purpose entail?

We provide online reporting tools “FleetReporting” and “International FleetReporting”. Clients’ contact persons can log onto these tools to review the status of their fleet, and to use other fleet reporting functionalities, such as dashboard reporting, trend analysis reporting, vehicle mileage and end of lease term.

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 2

2. With whom else do we share personal information?

In addition to what is indicated for each purpose above regarding sharing of personal information, we may also use third-party service providers to perform certain processings on our behalf, such as information technology and related infrastructure provision, security (including identity and access management) services, and legal, financial/accounting and other similar services.

To the extent that these third parties have access to personal information in order to execute these processings, we have undertaken technical, organizational and contractual measures to ensure that your personal information is exclusively processed for the purposes mentioned above.

Only if we are required to do so by law, your personal information may be provided to supervisory agencies, fiscal authorities and investigative agencies.

3. Do we transfer personal information to another country?

Due to the global nature of our organization and Services, your personal information may be stored and/or processed in a country other than the one you reside in. LeasePlan will ensure that where your data are transferred to another country, it will continue to receive adequate protection, such as through LeasePlan's own Binding Corporate Rules or through contractual arrangements put in place with third parties.

[By using the Services you agree to the transfer of information to countries outside of your country of residence, which may have different personal information protection rules than those of your country.

4. How long do we retain personal information?

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Statement, unless a longer retention period is required or permitted by applicable law.

5. How do we secure personal information?

Your personal information is treated as strictly confidential and LeasePlan has taken the appropriate technical and organizational security measures against loss or unlawful processing of such information. To this purpose, LeasePlan uses several security techniques, including secure servers, firewalls and encryption, as well as physically safeguarding the locations where personal information is stored.

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

6. Can minors use our Services?

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

7. How to deal with updates to this Statement?

We may change this Statement at any time. Any changes to this Statement will become effective when we post the revised Statement on the Services. Your use of the Services following these changes means that you accept the revised Statement.

8. How can you access, change or suppress your personal information?

If you would like to review, correct, update, suppress or delete your personal information processed by us, you may contact us by: contacto@leaseplan.pt or 707 20 20 20. 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 that you use to send us your request, 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.

9. Do you have questions?

If you have any questions about this Statement, please contact us by email or telephone at privacy.officer@leaseplan.pt or 707 20 20 20.