



**Last updated: 11 September 2018**

## **LeasePlan Insurance**

### **Privacy Statement**

Euro Insurances DAC trading as LeasePlan Insurance (“LeasePlan Insurance”) 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 Insurances’ Services, corporate governance, accountability and risk management. We therefore process only such personal information as is necessary for the provision of the relevant LeasePlan Insurance Services (‘Services’).

### **LeasePlan Insurance Privacy Pledges**

Regardless of when and how we process your personal data:

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

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

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

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## 1. Scope of this Privacy Statement

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

- I. Website visitors/users;
- II. Business Clients of LeasePlan Entities (“**Clients**”);
- III. Clients’ employees/drivers;
- IV. Private lease clients (including one man businesses);
- V. Private buyers of used vehicles
- VI. Third party claimants.

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

We collect and use your personal information through our various insurance services and fleet management solutions (“**Services**”).

### Responsibilities of Business Clients

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

## 2. Who we are

Euro Insurances DAC trading as LeasePlan Insurance is a subsidiary of LeasePlan Corporation N.V. (“LeasePlan”) which is a global car leasing company with leasing operations in 32 countries globally (“LeasePlan Entities”). LeasePlan Insurance is active in 23 countries where it provides Services for Clients of LeasePlan Entities.

LeasePlan Insurance is the company responsible for the processing of your personal information (data controller) when we receive your personal information from our appointed claim handlers when you, your employer or a third party makes a claim in relation to an accident involving the insured vehicle. LeasePlan Insurance is a joint controller with the LeasePlan Entity and with LeasePlan when we receive your personal data from the LeasePlan Entity in order to insure your vehicle.

## 3. How we collect your data

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

- **Through the Services**

The data which is processed by us in relation to the Services which we provide to you as the customer of the LeasePlan Entity or to you as the driver whereby your employer is the customer of the LeasePlan Entity. The Services start with the commencement of the insurance policy. We also process your data when the insured vehicle is involved in an accident for which a claim for compensation is made.

In order to provide you with the Services, we work closely with Service Partners and Service Providers. Service Partners are companies which assist us in providing our Services to you and, for example include claim handlers, intermediaries and reinsurers. Service Providers are companies retained by us to support us running our business, for example to maintain our IT network and related infrastructure.

- **From Other Sources**

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

- The relevant authority (e.g. police) where your vehicle was involved in an accident.
- From our independent Service Partners who assist us in providing our insurance and other services to you, including claim handlers, intermediaries and reinsurers.
- publicly available databases.
- joint marketing partners, when they share the information with us;

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

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

##### **4.1 LeasePlan Insurance website**

⇒ 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 and/or our affiliate the LeasePlan Entity or with your consent. Any processing of your personal information via cookies will take place in accordance with our Cookie Statement.

⇒ Which personal information do we process for this purpose?

For this purpose, we may 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 'Sharing data with third parties'.

##### **4.2 Insurance**

⇒ What does this purpose entail?

We collect your personal information when LeasePlan Insurance provides insurance cover to you through our affiliate the LeasePlan Entity. This processing is done for the performance of an agreement that you have with us and/or our affiliate the LeasePlan Entity or where we have a legitimate interest to do so as your insurance provider and to manage our business.

⇒ Which personal information do we process for this purpose?

For this purpose we collect your full name, gender, title, (business) contact details and vehicle registration number.

⇒ With whom do we share your personal information?

See section 'Sharing data with third parties'.

#### **4.3 Claims**

⇒ What does this purpose entail?

We collect your personal information from you when you make a claim to our appointed claim handler. 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. This processing is done based on our legitimate interest when the claim relates to damage to your vehicle and for the establishment, exercise or defence of legal claims or for insurance purposes when the claim relates to a bodily injury suffered by you.

⇒ Which personal information do we process for this purpose?

For this purpose we may collect your name, contact details, vehicle details, accident details, damage details/photos of the incident, date of birth, profession, marital status, number of dependants, number of passengers in the vehicle, information of witnesses to the accident (if applicable) and any other information you choose to provide in the context of the accident (including any information pertaining to possible injuries).

We collect your personal information from third parties (such as individuals involved in the accident, witnesses, insurance companies and other) through our appointed claim handlers. For this purpose we collect the information of third parties involved in the accident/incident (such as the identity of your passengers, driver and passengers of third-party vehicles, and the insurance information of other third parties involved, information about the incident and third-party claims).

We collect your information from authorities (such as police) through our appointed claim handler. For this purpose, we may collect your name, address, license plate number, information regarding the accident, police reports and witness statements.

You may be required to provide us (through our appointed claim handler) with sensitive personal data e.g. details about your health and/or criminal convictions and the health and/or criminal convictions of third parties. This information is important and will remain confidential. Processing your sensitive personal data may be necessary for the establishment, exercise or defence of legal claims, to enable us to comply with legal obligations to which we are subject or for insurance purposes.

⇒ With whom do we share your personal information?

We share this information with the Client of our Affiliate the LeasePlan Entity (your employer). 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 section 'Sharing data with third parties'.

#### **4.4 Compliance with laws and legal obligations and protection of LeasePlan Insurance assets and interests.**

⇒ What does this purpose entail?

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

⇒ Which personal information do we process for this purpose?

For this purpose we process your name, your contact information, your correspondence with LeasePlan Insurance, 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 Insurance 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**

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

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

In order to provide you with our services, we often work closely with Service Partners and Service Providers. Our Service Partners assist us in providing our Services and include claim handlers, intermediaries and reinsurers.

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 data

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

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

## 7. Security and retention

### How we secure personal data

We seek to use 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 Statement.

### How long we retain personal data

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

The criteria used to determine our retention periods include:

- 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 contact form]. 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.

### Questions?

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

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

### Additional information regarding the EEA

You may also:

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

## 10. Changes to this Privacy Statement

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

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