

Latest update: 21/05/21

DATA PROTECTION NOTICE FOR DRIVERS OF LEASED VEHICLES

LEASEPLAN HELLAS SINGLE-MEMBER S.A., with registered seat at Marousi, Athens, 17, Andrea Papandreou street («Ayvens Greece»), under its capacity as a data controller, hereby informs you about the collection and processing of personal data relating to you as a driver of a leased vehicle by you or your employer, as the principal or additional driver.

Ayvens Greece hereby assures that the protection of the security, integrity and confidentiality of your personal data is a commitment. Specifically, Ayvens Greece collects and processes:

I. Types of personal data collected:

- a. identification and contact information (e.g., name, surname, father's name, telephone number, ID number, driving license number), in accordance with the main / additional driver statement, the vehicle pick-up protocol and any document to be signed upon delivery of a replacement vehicle,
- b. employment information (e.g., employer name, employment address, job title and job position),
- c. vehicle traffic data and usage (e.g., vehicle registration number, vehicle damage maintenance and repair data, fines for Highway Code violations, accident reports, damage and / or injury settlement files, history of insurance claims)

The above data is obtained directly from the drivers, or the employer-LESSEE or third parties (e.g., Ayvens Greece partners engaged to the provision of leased vehicle management services), public authorities, the police, or injured third parties.

II. Purpose of data processing:

- a. granting of the use of a vehicle in your capacity as a driver of a vehicle leased by your employer-LESSEE,
- b. communicating with you for matters related to the management of the vehicle, to answer any queries you may have and to send you feedback surveys regarding Ayvens Greece services,
- c. management, delivery, return of vehicles, as well as the provision of maintenance, repair, insurance, and reinstatement services under the lease agreement signed between Ayvens Greece and the employer-LESSEE,
- d. management of the insurance contract, including the assessment, control and settlement of insurance compensation in the event of the occurrence of an insurance risk or even the payment of the insurance indemnity provided in the terms of the contract,
- e. management and payment of fines related to the use of the leased vehicle,
- f. the provision of information (e.g., vehicle fleet status, maintenance report) to the fleet manager mainly through the online fleet reporting platform and other available Ayvens Greece online applications, and
- g. sending mass communications intended to warn drivers of emergencies (e.g., extreme weather events) which may affect their driving capacity or impair the corporate fleet.

III. Legal basis for data processing:

- a. compliance of Ayvens Greece with its legal obligations, including those imposed by the applicable legal and regulatory framework and prevention of insurance fraud,
- b. the legitimate interest of Ayvens Greece in protecting the fleet and assets and the legitimate interest of the employer in obtaining information on the status of the vehicles it leases,
- c. risk management improvement and defence of Ayvens Greece's legal rights.



IV. Data recipients

- a. natural or legal persons with whom Ayvens Greece cooperates and natural or legal persons to whom Ayvens Greece entrusts the performance of specific tasks on its behalf, when and to the extent necessary for the provision of services to Ayvens Greece, subject to compliance with personal data protection and professional secrecy legislation. These persons mainly include insurance companies where third-party liability is insured, loss adjusters, third party insurance companies under the Direct Settlement System (DSA) or in the context of legal claims, to the Information Technology Division of the Insurance Union Companies of Greece (Y.S.A.E.), to companies which securely maintain, manage and destroy files, to telephone service providers, to lawyers, law firms, bailiffs, claim handlers and experts, information ser- vice providers and IT service providers, to the extent that they have access to Ayvens Greece IT systems.
- b. financial or judicial authorities or government agencies or public bodies, upon request and to the ex- tent required by law, for the purpose of fulfilling Ayvens Greece's legal obligations and for establishing and exercising the latter's legal claims before the judicial authorities,
- c. companies within the Ayvens Group for the aforementioned purposes

V. Data transfers outside EEA

Due to the global nature of Ayvens Greece's organization and services, your personal information may be stored and/or processed in a country other than your country of residence.

Any transfer of data outside the EEA or outside countries for which Adequacy decisions have been issued by the European Commission will take place once Ayvens Greece has entered the Ayvens Greece Binding Corporate Rules for Clients, Suppliers and Business Partners') and / or Standard Contractual Clauses.

For more information as well as for the request of a copy of them, you may contact Ayvens Greece at the electronic address: <u>privacy-officer.gr@ayvens.com.</u>

VI. Data retention period

Ayvens Greece will store and retain your personal data only for as long as is necessary for the above purposes and in accordance with the applicable law.

The criteria Ayvens Greece uses to determine the retention time of the data include the period of time: a. of usage of the vehicle owned by Ayvens Greece, b. that is required to ensure the exercise or defense of our legal claims under the statute of limitations, as applicable, c. as Ayvens Greece also retains some of your personal information, as required by law, to enable Ayvens Greece to comply with administrative and tax audits.

After the lapse of this period, Ayvens Greece will ensure the secure deletion, disposal, anonymization or archiving of your personal data.



VII. Personal data subjects' rights and how to exercise them

Under the General Data Protection Regulation (EU) 2016/679 and Law 4624/2019, you have the right to access, rectification, erasure, objection and restriction in relation to the processing of your personal data included in Ayvens Greece registers, which you may ask by contacting the Local Compliance Officer of Ayvens Greece at the electronic address: privacy-officer.gr@ayvens.com. or by clicking here.
You are also entitled to file a complaint to the Data Protection Authority (www.dpa.gr) in case that you consider that Ayvens Greece acts in violation of the legal and regulatory framework of personal data protection.

VII. Updates to the present Notice

Please refer to the link https://www.ayvens.com/en-gr/data-protection-notice/ regularly to be notified of any changes to this update. Also, for more information about how Ayvens Greece handles personal data, you can consult the Ayvens Greece Privacy Policy, which is posted at https://www.ayvens.com/en-gr/privacy-statement/ or send an e-mail to privacy-officer.gr@ayvens.com.