

## **DATA PROTECTION NOTICE FOR LESSEES - LEGAL REPRESENTATIVES - ULTIMATE BENEFICIAL OWNERS (UBOs) - GUARANTORS**

**LEASEPLAN HELLAS SINGLE-MEMBER S.A.**, with registered seat at Marousi, Athens, 17, Andrea Papandreou street («Ayvens Greece»), hereby inform you under its capacity as a data controller about the collection and processing of personal data relating to you as the LESSEE (in case of a natural person or sole proprietorship), legal representative and/or Ultimate Beneficial Owner ('UBO') of the LESSEE, or guarantor in favor of the LESSEE.

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 data (e.g., name, surname, father's name, place and date of birth, Identity card or passport number, VAT number / Tax Authority), based on the Financial Offer and the UBO Form,
- b. contacts details (e.g., telephone number, email address, mailing address and public utility bill), on the basis of the Financial Offer and the UBO Form,
- c. financial and asset data and information on the professional status / employment, based on the Financial Offer, the financial and tax information sent by the LESSEE and data deriving from companies providing business information services (e.g., TIRESIAS S.A. ICAP S.A.).
- d. information in relation to the vehicle traffic and use (e.g., vehicle registration number, repair and maintenance reports, fines for Highway Code violations, accident declaration reports, details of claims settlement files on material damages and/or personal injuries, history of insurance claims)

### **II. Purpose of data processing:**

- a. identification and verification of identity of the LESSEE, its legal representatives and its UBOs (if they exist),
- b. communicating with the LESSEE and its legal representatives to answer any queries or requests you may have and to send you feedback surveys regarding Ayvens Greece services,
- c. the conclusion of an agreement with the LESSEE and communication with the latter for the fulfillment of contractual and / or legal obligations, and the provision of Ayvens Greece services to the LESSEE, which includes the management, delivery, return of vehicle, as well as the provision of maintenance, repair, insurance and damage repair services,
- d. the credit risk assessment and debt repayment capacity, the pursuit of debt recovery in the event of default.
- e. compliance with the legal and regulatory framework in relation to anti-money laundering, terrorist financing and sanctions and the adoption of security measures for the prevention of abuse and fraud,
- f. 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,
- g. management and payment of fines related to the use of the leased vehicle,
- h. 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,
- b. performance of the leasing agreement or preparatory measures for the conclusion of the agreement,
- c. Ayvens Greece's legitimate interest in exercising its right to financial freedom based on information that ensures commercial credit, credibility and security of transactions, and the protection of its fleet and assets
- d. 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 include mainly debtor information and collection companies in case of overdue debts, information service providers, IT service providers, insurance companies in which vehicles are insured, claims handlers and experts, 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, as well as tax consultants, lawyers, law firms, notary public, bailiffs,
- b. financial or judicial authorities or government agencies or public bodies, upon request and to the extent required by law, for the purpose of fulfilling Ayvens Greece's legal obligations and for the purpose of exercising and defending its legal rights before the judicial authorities,
- c. companies within the Ayvens Greece Greece 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 into 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: [privacy-officer.gr@ayvens.com](mailto:privacy-officer.gr@ayvens.com).

### **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 time period: 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](mailto: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](http://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](mailto:privacy-officer.gr@ayvens.com).