

# Global Privacy Statement

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# Global Privacy Statement

Last updated: 31 July 2024

Your privacy is important to us and to the entire Société Générale Group to which Axus Nederland N.V., trading under the name Ayvens (“**Ayvens**”) belongs. This is a matter of priority for us and we have implemented strong principles when it comes to protecting your data. Compliance with applicable privacy and data protection legislation is an integral component of Ayvens’ services, corporate governance, risk management and overall accountability. We only process personal data as is necessary for our business activities and the provision of the Ayvens services.

This Global Privacy Statement (the “**Statement**”) describes our practices in connection with the personal information (“**Personal Data**”) that we process about you and your business relationship with Ayvens.

Please read this Statement carefully so that you understand how we collect and use your Personal Data.



# 1 Scope of this Privacy Statement

1. Website visitors/users (“**Website Visitors**”)
  2. Corporate Customers (“**Customers**”)
  3. Customers’ employees/drivers (“**Drivers**”)
  4. Private lease customer (including sole proprietors and partnerships) (“**Private Lease Customers**”)
  5. Private buyers of used vehicles (“**Buyers**”)
  6. Professional buyers of used vehicles (“**Traders**”)
  7. Suppliers of goods and services (“**Suppliers**”)
  8. Any third party, other than a customer, buyer, trader or supplier, with a business relationship or strategic alliance (“**Business Partners**”)
- (or prospects in relation to the above; individually and collectively also referred to as “**you**”, “**your**” or “**yours**”).

We collect and use your Personal Data through our various vehicle and fleet leasing, fleet management and driver mobility services and in the course of performing our business activities (“**Services**”).

Please note that specific services may be subject to a separate privacy statement referenced in the respective terms.

## Responsibilities of Customers

Insofar as Customers in their capacity as employers have access to Personal Data of their employees, i.e. Drivers, the Customer is the controller responsible for the processing and use thereof in such capacity. This Statement does not apply to the processing and use of Personal Data of Drivers by our Customers.



## 2 Who are we?

Axus Nederland N.V., also trading under the name Ayvens is the company responsible for processing and using your Personal Data (data controller):

Seat under the articles of association is Amsterdam. Postal address: PO Box 3001, 1300 EB Almere.

Ayvens may share Personal Data with the group of companies to which it belongs, including ALD SA and Société Generale, which act as processors on our behalf.

Please note that this Statement applies to the following companies/subsidiaries:

- Axus Nederland N.V., also trading under the name Ayvens, Chamber of Commerce number 39037163.
- Accident Management Services (AMS), Chamber of Commerce number 39053107.
- LeasePlan Rechtshulp B.V., Chamber of Commerce number 12021176.
- Firenta B.V., Chamber of Commerce number 29045325.

Ayvens may also be referred to as “**we**”, “**our**” or “**us**”.

Please also note that certain Services are subject to a separate privacy statement referred to in the relevant terms and conditions or app, such as the processing of your Personal Data for our telematics services.



# 3 How do we collect your data?

We and our service providers collect Personal Data in various ways, including:

- **Through sales activities**

We commence the processing of Personal Data if you provide this, directly or indirectly via third parties, e.g. as part of an offline sales lead, registration, online contact form, inquiry by e-mail, telephone, chat and/or application, survey or price competition.

- **Through our Services**

Most of the Personal Data we collect is in relation to the Services we provide or will be providing to you as (i) a Driver and our Customer, your employer, if you are using a company vehicle, or (ii) a Private Lease Customer. This starts with the registration of your Personal Data relating to the vehicle to be leased (in some circumstances, we carry out some preliminary credit checks first). It continues with the registration of the leased vehicle and when we communicate with you about our services, e.g. to arrange periodic maintenance and repairs. We may also process your Personal 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, the sale of used Ayvens vehicles.

- **Online**

We collect Personal Data from you online, when:

- You visit our websites or social media channels;
- Place an order over the phone or contact customer service;
- Joint marketing partners share the information with us;
- You connect your social media account to your Services account or when you share information from our websites on your social media platforms, you will share certain Personal Data from your social media account with us, for example your name, e-mail address, photo, list of social media contacts, and any other information that you make accessible to us when you connect your social media account to your Services account.

- **Offline**

We also collect Personal Data about you offline, for example when you visit our premises, place an order by phone or contact our customer services department by phone.



- **From other sources**

We also receive your Personal Data from other sources, for example:

- Drivers' employers, if you use a company vehicle;
- The relevant authority (e.g. police or justice department) when we are the recipient of traffic fines in relation to your leased vehicle;
- Public and government authorities, including public and government authorities outside your country of residence, where we are subject to sanctions and embargoes or anti-money laundering and counter terrorism regulations;
- From our independent service partners who assist us in providing our leasing and other services to you, including dealerships, maintenance providers and body repair shops;
- From our partnerships being for instance original equipment manufacturers or dealerships; and
- Publicly available databases, credit reference agencies and other sources.

We need to collect Personal Data in order to provide the requested Services to you or to handle queries, comments or complaints related to our Services. If you do not provide the Personal Data requested, we may not be able to provide the Services. If you disclose any Personal Data relating to other persons to us or to our service providers in connection with the Services, you thereby indicate that you have the authority to do so and permit us to use the information in accordance with this Statement.

#### **Monitoring of communications**

Subject to applicable laws, we will monitor and record calls, e-mail, 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 when 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 sanctions and embargoes or anti-money laundering and counter terrorism regulations to which we are subject. In particular, telephone calls may be recorded for these purposes.





# 4

## Why and on which legal basis do we use Personal Data?

### 4.1. Data pertaining to website visitors

#### 4.1.1. Websites

##### 4.1.1.1. To communicate with you

- **What does this purpose entail?**

We process your Personal Data 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 entering into or performance of an agreement that you have with us, to be able to respond to a request or with your consent.

- **Which Personal Data do we process for this purpose?**

For this purpose, we may collect your (business) contact details (for instance your name(s), email address, telephone number), license plate or registration number and any other information that you provide to us in the open text fields 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 Data?**

See chapter 5 '[Sharing data with third parties](#)'.



### 4.1.1.2. For surveys or other (marketing) communication

- **What does this purpose entail?**

We process your Personal Data when you complete a survey on our website or via another tool, for feedback on our websites and/or Services, with your consent or for which we have a legitimate interest in processing this data (improvement of services). With your consent or where we have a legitimate interest, we may send you marketing communication, to keep you updated on events, special offers, opportunities and current and future products and services of Ayvens. When we contact you in regard of surveys or marketing communication, we will do so either by e-mail, phone, or by postal mailings (newsletters/brochures/magazines). If you would no longer like to receive surveys or marketing communications from us, please use the opt-out options in the communication, or contact us via the [Privacy rights form](#). Based on your visit to an Ayvens website, we can show you personalised advertisements outside the Ayvens website. To understand what is relevant to you, we can use manual and automated tools to analyse your personal information.

- **Which Personal Data do we process for this purpose?**

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

- **With whom do we share your Personal Data?**

See chapter 5 '[Sharing data with third parties](#)'.

## 4.1.2. Social media

### 4.1.2.1. To facilitate social sharing functionality

- **What does this purpose entail?**

Our websites may contain various social media sharing functionalities, such as LinkedIn, Facebook or Snapchat 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 LinkedIn or Facebook pages or our X feed, which you may choose to use to post feedback.

Likewise, various social media websites, such as LinkedIn, Facebook, Snapchat or X, may contain Ayvens 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 of policies and practices (including data security practices) of other organisations,



such as, Meta (Facebook), X, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufactures. This includes any personal information you disclose to other organisations through or in relation to our social media functionalities and/or advertisements. Processing of personal information is subject to privacy policies and practices of these other organisations.

- **Which Personal Data do we process for this purpose?**

For this purpose, we process your name, e-mail address, IP-address, photo, list of social media contacts and any other information that we can access when you use social media functionalities.

- **With whom do we share your Personal Data?**

See chapter 5 '[Sharing data with third parties](#)'.

### 4.1.3. Cookies and similar technologies

Any processing of your Personal Data via cookies and/or similar technologies takes place in accordance with our cookie statement, available on [ayvens.com](http://ayvens.com) or the local website of the relevant Ayvens entity.

### 4.1.4. Ayvens Business Purposes

#### 4.1.4.1. Management reporting

- **What does this purpose entail?**

Personal Data for various Ayvens business-related purposes for which have a legitimate interest in processing this data, such as audits, developing new products, enhancing, improving or modifying our websites and Services, data analysis, 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 analyse data that we collect when you use 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 optimise or limit our communication and marketing activities by channel and by device.

- **Which Personal Data do we process for this purpose?**

For this purpose, we may process your name, e-mail address, IP address, gender, date of birth, place of residence, digits of your postal code 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 Data?**

See chapter 5 '[Sharing data with third parties](#)'.

#### 4.1.4.2. Compliance with laws and legal obligations and protection of Ayvens 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 Data as appropriate or necessary

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations;
- (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 our affiliates, you or others; and
- (g) to allow us to pursue available remedies or limit the damage that we may sustain.

- **Which Personal Data do we process for this purpose?**

For this purpose, we process your name, contact information, correspondence with Ayvens, 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 Data?**

If we are required to do so by law or sectorial recommendations to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, tax authorities and investigative agencies. See also chapter 5 '[Sharing data with third parties](#)'.

## 4.2. Data pertaining to Customers

### 4.2.1. Customer Account Management

#### 4.2.1.1. To provide, manage and administer the Customer account

- **What does this purpose entail?**

We process your Personal Data to handle day-to-day management and administration of



the customer accounts, such as maintaining contracts and keeping you informed of all important developments regarding the Services and other information relevant for the Customer 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 Data do we process for this purpose?**  
For this purpose, we may process business contact details and log-in details to our Customer online accounts.
- **With whom do we share your Personal Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

#### 4.2.1.2. To communicate with you

- **What does this purpose entail?**  
You can contact us by various means (such as e-mail or telephone, or via our website). In this case we use your Personal Data to answer your question/request. We can also contact you, for example, regarding day-to-day management and administration of your Customer 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 Data do we process for this purpose?**  
For this purpose, we may process your name, business contact details, correspondence with Ayvens 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 Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

#### 4.2.1.3. For surveys or other (marketing) communication

- **What does this purpose entail?**  
We process your Personal Data to send you surveys, for which we have a legitimate interest to process this data (improving or modifying our Services). With your consent or where we have a legitimate interest, we may send you marketing communication, for example, to keep you updated on events, current and future offers, opportunities and current and future products and services of Ayvens. We will send you such surveys in the form of either a periodic e-mail or an e-mail 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 analyse your personal information. If you would no longer like to receive surveys or marketing communication from us, please opt out or contact us via the [Privacy rights form](#).

To facilitate your use of our online Services or applications, we may analyse 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 optimise or limit our communication and marketing activities by channel and by device.

- **Which Personal Data 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 Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

## 4.2.2. Ayvens Premises

### 4.2.2.1. Access to and security control of Ayvens premises

- **What does this purpose entail?**  
We may process your Personal Data 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 protection of our assets).
- **Which Personal Data do we process for this purpose?**  
For this purpose, we may process your name, 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 CCTV.
- **With whom do we share your Personal Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

## 4.2.3. Customer reporting



### 4.2.3.1. Fleet Reporting Tool

- **What does this purpose entail?**

We provide a designated fleet reporting tool. Customers' contact persons can log onto these tools to review the status of their fleet, damage reporting, manage contracts and 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 (to be able to service Drivers employed by our Customers) and relates to the performance of the lease agreement that we have with our Customer.
- **Which Personal Data do we process for this purpose?**

For this purpose, we process contact details and job title (e.g. (International) Fleet Manager) of Customer's contact person, and login details (e.g. username and password).
- **With whom do we share your Personal Data?**

See chapter 5 '[Sharing data with third parties](#)'.

### 4.2.4. Ayvens Business Purposes

#### 4.2.4.1. Management reporting

- **What does this purpose entail?**

We process your Personal Data for various business purposes, for which we have a legitimate interest in processing this 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 and applications, we may analyse data that we collect when you use 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 optimise or limit our communication and marketing activities by channel and by device.



- **Which Personal Data 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 the purposes set out above.
- **With whom do we share your Personal Data?**  
See chapter 5 'Sharing data with third parties'.

#### 4.2.4.2. Compliance with laws and legal obligations and protection of Ayvens 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 Data as appropriate or necessary
  - (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence (CDD), 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 our affiliates, you or others;  
and
  - (h) to allow us to pursue available remedies or limit the damage that we may sustain.
- **Which Personal Data 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 Ayvens wants 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(s) the company towards Ayvens, your correspondence with Ayvens, 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. For Counterparty Due Diligence (CDD) purposes we also periodically process investigation data based on sanctions, enforcement, adverse media, politically exposed persons and anti-slavery screening. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note that multiple (trained) employees are involved to evaluate the screening results in case of a 'hit' (human intervention).





- **With whom do we share your Personal Data?**

If we are required to do so by law or sectorial recommendations to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, tax authorities and investigative agencies. See chapter 5 '[Sharing data with third parties](#)'.

## 4.3. Data on Drivers (employees/drivers of our customers)

### 4.3.1. Driver contact details

#### 4.3.1.1. To communicate with you

- **What does this purpose entail?**

You can contact us by various means (such as e-mail or telephone, or via our website). In this case we use your Personal Data 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/or your employer (under the lease agreement that we have with your employer) or with your consent.

- **Which Personal Data do we process for this purpose?**

For this purpose, we may process your name, contact information, correspondence with Ayvens pertaining to your question/request and all other Personal Data 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 with customer services departments for which we have a legitimate business interest.

- **With whom do we share your Personal Data?**

We may share contact information with our Customer (your employer) for processing reports. See chapter 5 '[Sharing data with third parties](#)'.

#### 4.3.1.2. For surveys or other (marketing) communication

- **What does this purpose entail?**

We process your Personal Data 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 in processing this data.



With your consent or where we have a legitimate interest, we may send you marketing communication to keep you updated on events, current and future offers, opportunities and current and future products and services of Ayvens. When we contact you in regard of surveys or marketing communication, we will do so either by e-mail or by postal mailings (paper newsletters/brochures/magazines). To understand what is relevant to you, we can use manual and automatic tools to analyse your personal information. If you would no longer like to receive marketing communication from us, please contact us via the Privacy Rights form.

- **Which Personal Data do we process for this purpose?**  
For this purpose, we process your name, address, e-mail address, license plate number and your interests (as indicated by you).
- **With whom do we share your Personal Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

## 4.3.2. Vehicle services

### 4.3.2.1. Purchase and management of the vehicle

- **What does this purpose entail?**  
We process your Personal Data 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 Data do we process for this purpose?**  
For this purpose, we process your name, address, (company) e-mail address, lease category, license plate number, make and model, maintenance history and operational contact with you. In addition, you may provide certain information pertaining to vehicle management to us through the Ayvens or third party portals or apps, or when you call Ayvens.
- **With whom do we share your Personal Data?**  
We share information pertaining to the management of the vehicle with our Customers (your employer). See also chapter 5 '[Sharing data with third parties](#)'.

### 4.3.2.2. Repair, maintenance and tyres

- **What does this purpose entail?**  
We process your Personal Data in connection with the provision of (scheduled) repair and maintenance and tyre service and to analyse, predict and proactively manage maintenance and repairs for



your vehicle, for which we have a 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.

○ **Which Personal Data do we process for this purpose?**

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

○ **With whom do we share your Personal Data?**

We share information with our Customers (your employer) and with third parties performing maintenance/repair on the vehicle or changing or replacing tyres, such as dealers/garages, body repair shops or car fitters. See also chapter 5 '[Sharing data with third parties](#)'.

### 4.3.2.3. Accident management

○ **What does this purpose entail?**

We process your Personal Data 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 at our customer services department or via our driver portals, (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 Services 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 this data.

○ **Which Personal Data do we process for this purpose?**

For this purpose, we collect the following Personal Data:

- Us: license plate number, make and model, maintenance history and operational contact with you.
- From you: your name, contact details, vehicle details, accident 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 injuries if any).
- 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 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 Data?**  
We share this information with our Customer (your employer) through the designated fleet reporting tool. We may also share certain information with dealers/garages, body repair shops, car fitters, insurance companies (which may be both affiliated and third-party insurance companies) and professional experts employed on our behalf or on behalf of third parties (such as lawyers, medical experts, investigators) for the purpose of damage or claim resolution. See also chapter 5 '[Sharing data with third parties](#)'.

#### 4.3.2.4. Traffic and parking fines management

- **What does this purpose entail?**  
The following may depend on the country where Drivers 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 Ayvens by the authority that issued a specific traffic or parking fine (such as police or local municipality).

We process your Personal Data for the purpose of processing and managing the payment of the fine and, if applicable, obtaining reimbursement from our Customer (your employer), for which we have a legitimate interest in processing this data.

- **Which Personal Data 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, date and time of the offence/incident committed by you and the imposed fines.
- **With whom do we share your Personal Data?**  
Ayvens may need to share this information with our Customer (your employer) in certain situations, for example, when leased vehicles are used in carpools and Ayvens does not know who the actual driver of a specific vehicle is. See also chapter 5 '[Sharing data with third parties](#)'.

#### 4.3.2.5. Fuel card, EV charging and tolls

- **What does this purpose entail?**  
Where applicable, our Services include a fuel management programme, which allows you to, for example, pay for your fuel at gas stations using a Ayvens issued or managed payment system. In case you have an electric vehicle (“EV”), you may be provided with an EV charging card for charging your vehicle at charging points. We may also arrange for placing an EV charging station as part of the contract. 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 about you to manage toll-related activities of your employer's vehicle fleet.

- **Which Personal Data do we process for this purpose?**

For this purpose, we collect the following information: your name, contact information, e-mail address, fuel or EV charging card number, charging station number, address, phone number, license plate number, fuel information, mileage and related costs. In case of reimbursements, 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 Data?**

Ayvens needs to share the information with the fuel card/EV charging solution/payment company. Also, our Customers (your employer) may have access to certain Personal Data made available by us on our Internet or e-Mobility portal or online reporting tool. Customers 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 the designated fleet reporting tool, Customers can also request fuel cards or EV charging cards. See also chapter 5 '[Sharing data with third parties](#)'.

#### 4.3.2.6. Financial records

- **What does this purpose entail?**

Our Service may include the provision of reports to Customers (employers) with which the correct tax addition can be deducted from the salary by the employer. The employer records the lease car at the driver's disposal and, if necessary, the tax value for determining the addition to the monthly salary. Other expenses may also be incurred and paid by the employer.

- **Which Personal Data do we use for this purpose?**

For this purpose, we collect the following information: salary/personnel number, private use of the vehicle, part-time percentage, personal contribution and tax addition. In order to process other costs, we collect: policy excess in case of damage, toll charges, rental charges for not returning a rental car on time, time and sometimes location of an event.

- **With whom do we share your Personal Data?**

We share this information with our Customer (your employer) for processing reportings. Sometimes we also share the information with third parties engaged by us or our Customer (your employer) to assist with this Service. See chapter 5 '[Sharing data with third parties](#)'.

#### 4.3.3. Mobility services



### 4.3.3.1. Renting

- **What does this purpose entail?**

In case we provide our rental programme services to you we collect your Personal Data, so that you can, for example, reach Ayvens' rental specialists through our customer services department, 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 Data do we process for this purpose?**

For this purpose, we collect: your name, e-mail address, mobile phone number, driving licence details, license plate number, related costs, delivery location, rental time and company contact person.

- **With whom do we share your Personal Data?**

We share your data with Ayvens' (external) rental specialists, as well as with our Customers (your employer). See also chapter 5 '[Sharing data with third parties](#)'.

### 4.3.3.2. Car sharing

- **What does this purpose entail?**

We collect information when you register as a user through our platform, when you use our platform and when you use a vehicle. This processing is necessary to carry out the Car Sharing service. We offer the platform to use a vehicle. Through the platform, you can make a reservation, find practical information about the vehicle and report damage. You can contact us by various means (such as via e-mail, telephone, in the app). In this case we use your Personal Data to answer your question/request. We may also contact you about the service ourselves. This processing is required for the performance of the service or the processing is based on your consent.

- **Which Personal Data do we use for this purpose?**

We receive your name and e-mail address from your employer (our Customer) to give you access to the car sharing system platform. To activate your account, we additionally ask for your date of birth and phone number. But also your trip registration and GPS information of the trip you make, pick-up location and return location. We also use for this purpose the license plate number of the car you use, maintenance history, date and period of use, mileage, user history, vehicle data. In addition, you can provide certain information pertaining to vehicle management to us through the app or when you call Ayvens.

- **With whom do we share your Personal Data?**

We only share your information with third parties with whom we have an agreement. For example, we have agreements with the party that manages the platform for us. We also share information with our Customer (your employer) for processing reportings.



See chapter 5 '[Sharing of data with third parties](#)'.

#### 4.3.3.3. Roadside assistance

○ **What does this purpose entail?**

When you experience a malfunction, for example, a flat tyre or mechanical difficulties while on the road, Ayvens may arrange roadside assistance. To this end, 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 Data do we process for this purpose?**

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

○ **With whom do we share your Personal Data?**

We share your data with third parties providing on the road repair services, towing services or a replacement vehicle, as well as with our Customers (your employer). See also chapter 5 '[Sharing of data with third parties](#)'.

#### 4.3.3.4. Mobility-as-a-Service for Employees (Move)

○ **What does this purpose entail?**

We offer a comprehensive Mobility Management platform (“**Move**”) for all the employees of our Customers, being the:

- Corporate car drivers, to enable them being more sustainable and have alternative options to driving a car;
- Rest of the employees, to ensure their commuting options are flexible while in-line with their employer’s CO<sub>2</sub> requirements.

Move is a customer and employee-oriented service. Employees benefit from the access to 250+ mobility providers and various transportation options thanks to the mobility payment & management solution, our Customers (admin/HR/CSR/procurement/ mobility managers) obtain a hassle-free and user-friendly platform to organise the mobility policy and follow up on it. This processing is based on our legitimate interest and is also related to delivering the Services to you and your employer under the performance of the agreement that we have with your employer.

○ **Which Personal Data do we process for this purpose?**



For this purpose, we collect from the users: name, e-mail address, phone number, date of birth, gender, card delivery location and company contact person. Furthermore, we collect from the representative of the Customer: ID card number, country of birth and nationality.

- **With whom do we share your Personal Data?**

We share your data with third parties providing mobility services, as well as with our Customers (your employer). See also chapter 5 '[Sharing data with third parties](#)'.

## 4.3.4. Driver safety programme

### 4.3.4.1. To prepare, manage and administer trainings

- **What does this purpose entail?**

In case we provide our driver safety and risk management training programmes to you we collect your Personal Data in order to analyse and improve driving behaviour, promote Customer's proactive commitment to safety and good corporate citizenship, decrease accident rates, validate the effectiveness of Customer's overall safety initiatives and identify communication and training opportunities. We engage third parties for administering and executing such safety programmes. They will contact you to conduct a safety assessment and provide the actual training courses (online or classroom teaching). Any Personal Data collected by the third party in relation to this is subject to the privacy practices of such third party. From these third parties we receive your 'driver risk index' (information about potential risks identified through questionnaires), 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 Data do we process for this purpose?**

For this purpose, we collect/process the following Personal Data:

- Directly from Customers (your employer): your name, (company) e-mail address and license plate number.
- From third parties engaged by us: driver risk index, recommended trainings, trainings signed up for, and trainings completed.

- **With whom do we share your Personal Data?**

We share your information with third parties engaged by us to administer and execute the driver safety programmes, as well as with our Customers (your employer). See also chapter 5 '[Sharing data with third parties](#)'.

## 4.3.5. Online portals and apps





### 4.3.5.1. Various portals and apps for Drivers

- **What does this purpose entail?**

Depending on the country you live in, we provide online portals 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 tyres through online appointment planners, contact our customer services department, view and pay fines, claim (fuel) expenses and, in case you have an EV, manage charging.

We may also provide you with dashboard-type overview that can provide your insight into your use of the vehicle (such as your average fuel efficiency, your cases of damage, etc.). This processing is based on our 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 or with your consent.

- **Which Personal Data do we process for this purpose?**

We receive your name and e-mail address from your employer (our Customer) to provide you with Ayvens 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 Data?**

We share your data with third parties engaged by us to administer and execute the various portals and apps for drivers, as well as with our Customers (your employer). See also chapter 5 '[Sharing data with third parties](#)'.

### 4.3.5.2. MyFleet

- **What does this purpose entail?**

MyFleet provides dashboard reporting at national and/or international level to our Customers (your employer). For instance, MyFleet allows Customers to access and evaluate the mileage or the remaining lease period of (individual) vehicles. We also use the data contained in the fleet reporting tool to provide (aggregated) insights to our Customers (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 CO<sub>2</sub> emissions as part of the Customer's corporate social responsibility obligations and compliance, assessing the effectiveness of policy changes and proactively communicating relevant fleet developments. This processing is related to the provision of the Services to you and your employer for the performance of the lease contract with your employer and is also based on our legitimate interest.



By way of example, on the basis of such dashboard reporting, each Customer may have access to (i) various data pertaining to the CO<sub>2</sub> emissions of its vehicle fleet per country, and (ii) measures proposed by Ayvens to reduce the fleet's environmental impact. Ayvens and the Customer can then study and discuss the company's fleet/vehicle policies and set targets in order to achieve a lasting reduction of fuel, CO<sub>2</sub> emissions and other vehicle related expenses. Thus, based on such information, each Customer can take informed decisions aimed at reducing CO<sub>2</sub> emissions within its fleet in a certain country, for example by providing energy-efficient driving style training to its Drivers or acquiring more climate neutral vehicles.

○ **Which Personal Data do we use for this purpose?**

For this purpose, we may process the following Personal Data:

- From our Customer (your employer): name of the Driver, Driver ID generated by the Customer, name and contact details of the Customer's contact person, (e-mail) address, telephone number, nationality and use of fuel card (optional).
- Ourselves: vehicle details (for example make, model, registration number, license plate number), remaining contract duration, damage sustained by a vehicle, fuel type, number and type of fuel card, fuel consumption and insurance data.
- From Driver: mileage and description of damage sustained by a vehicle involved in an accident.
- Data received from others (such as police, local municipalities, maintenance garage/centre): traffic and/or parking fines, mileage and information on vehicle maintenance and repairs.

○ **With whom do we share your Personal Data?**

We share this information with the authorised (International) Fleet Manager on behalf of the Customer (your employer). See also chapter 5 '[Sharing data with third parties](#)'.

### 4.3.5.3. Fleet Reporting Tool

○ **What does this purpose entail?**

The designated fleet reporting tool entails dashboard reporting on a national and/or international level to our Customers (your employer). The fleet reporting tool allows Customers 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 Customers (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), fleet policy implementation, having the ability to report on global CO<sub>2</sub> emissions as part of the Customer'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 Customer has access to (i) various data pertaining to the CO<sub>2</sub> emissions of its vehicle fleet per country, and (ii) measures proposed by Ayvens to reduce the fleet's environmental impact. Ayvens and the Customer can then study and discuss the company's fleet/vehicle policies and set targets in order to achieve a lasting reduction of fuel, CO<sub>2</sub> emissions and other vehicle related expenses. Thus, based on such information, each Customer can take informed decisions aimed at reducing CO<sub>2</sub> 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 Data do we process for this purpose?**

For this purpose, we may process the following Personal Data:

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

○ **With whom do we share your Personal Data?**

We share this information with the authorised (International) Fleet Manager on behalf of the Customer (your employer). See also chapter 5 '[Sharing data with third parties](#)'.

## 4.3.6. Ayvens Business Purposes

### 4.3.6.1. Management reporting

○ **What does this purpose entail?**

We process your Personal Data for various business purposes, for which we have a legitimate interest in processing this 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 analyse data that we collect when you use 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 optimise or limit our communication and marketing activities by channel and by device.

- **Which Personal Data 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 the purposes set out above.

- **With whom do we share your Personal Data?**

We share this information with the authorised (International) Fleet Manager on behalf of the Customer (your employer). See also chapter 5 '[Sharing data with third parties](#)'.

#### 4.3.6.2. Compliance with laws and legal obligations and protection of Ayvens 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 Data as appropriate or necessary

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations;
- (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 our affiliates, you or others; and
- (g) to allow us to pursue available remedies or limit the damage that we may sustain. If you and your employer have given consent, Ayvens can also analyse information about your vehicle(s) if you have already leased a vehicle via Ayvens, for example to determine the lease price of your new lease vehicle.

- **Which Personal Data do we process for this purpose?**

For this purpose, we process your name, contact information, correspondence with Ayvens, 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 Data?**



If we are required to do so by law or sectorial recommendations to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, tax authorities and investigative agencies. In that case we may share this information with the authorised (International) Fleet Manager on behalf of the Customer (your employer). See also chapter 5 'Sharing data with third parties'.



## 4.4. Data pertaining to private lease customers (including sole proprietors and partnerships)

### 4.4.1. Signing up

#### 4.4.1.1. To be able to accept you as a customer

- **What does this purpose entail?**  
We collect information when you sign up (via our website) as a customer. This processing is required for the conclusion and performance of the lease agreement, including assessment, identifying and acceptance of you as a customer and any credit checks.
- **Which Personal Data do we process for this purpose?**  
For this purpose, we collect your name, gender, title, address, contact details (including your e-mail address and telephone number), driving licence details, delivery address or pick-up location, income details, transaction data (such as order, amount(s) to be paid, date of payment), bank account information, backgrounds checks investigation data (among others credit score), and the authorisation you give to Ayvens. Additionally, where required, we may process your proof of identity and biometric data for online identification and verification purposes.
- **With whom do we share your Personal Data?**  
We only 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 share information that is necessary for the execution of the payments. See also chapter 5 '[Sharing of data with third parties](#)'.

#### 4.4.1.2. 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 vehicle, contact information and other personal information, report changes thereto, report damage to your vehicle, record appointments for repairs, maintenance or tyre change, contact our customer service, consult and pay fines. This processing is required for the performance of the lease agreement or is done with your consent.
- **Which Personal Data do we process for this purpose?**  
For this purpose, we collect your name and e-mail address to send you a temporary password, which you will need to use the platform and apps.
- **With whom do we share your Personal Data?**



See chapter 5 '[Sharing data with third parties](#)'.

## 4.4.2. Contact

### 4.4.2.1. To communicate with you

- **What does this purpose entail?**

You can contact us by various means (such as via e-mail, telephone, our website). In that case we use your Personal Data 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 is done with your consent.

- **Which Personal Data do we process for this purpose?**

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

- **With whom do we share your Personal Data?**

See chapter 5 '[Sharing data with third parties](#)'.

### 4.4.2.2. For surveys or other (marketing) communication

- **What does this purpose entail?**

We process your Personal Data 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 in processing this data. With your consent or where we have a legitimate interest, we may send you marketing communication to keep you updated on events, current and future offers, opportunities and current and future products and services of Ayvens. When we contact you in regard of surveys or marketing communication, we will do so either by e-mail or by postal mailings (newsletters/brochures/magazines). To understand what is relevant to you, we can use manual and automatic tools to analyse your Personal Data. If you would no longer like to receive surveys or marketing communications from us, please use the opt-out options in the communications, or contact the local Ayvens entity via the [Privacy rights form](#).

- **Which Personal Data do we process for this purpose?**

For this purpose, we process your name, address, e-mail address, the 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 Data?**



See chapter 5 '[Sharing data with third parties](#)'.





## 4.4.3. Vehicle services

### 4.4.3.1. 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 the performance of the lease agreement.
- **Which Personal Data do we process for this purpose?**  
For this purpose, we process your name, address, (company) e-mail address, lease category, license plate number, make and model, maintenance history and operational contact with you. In addition, you may provide certain information pertaining to vehicle management to us through the Ayvens portal, or when you call Ayvens or any partners.
- **With whom do we share your Personal Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

### 4.4.3.2. Repair, maintenance and tyres

- **What does this purpose entail?**  
We process your Personal Data in relation to providing (scheduled) repair and maintenance services and tyre services for your vehicle and to analyse, predict and pro-actively steer on maintenance and repairs. For this processing we have a legitimate business interest and this processing is required for performance of the lease agreement.
- **Which Personal Data do we process for this purpose?**  
For this purpose, we process your name, address, (company) e-mail address, license plate number, vehicle identification number, make and model, maintenance history and operational contact with you. In addition, you may provide certain information to us through the Ayvens portal (e.g. your phone number to make an appointment for maintenance of the vehicle), or when you call Ayvens.
- **With whom do we share your Personal Data?**  
We share information with third parties performing maintenance/repair on the vehicle or changing or replacing tyres, such as dealers/garages, body repair shops or car fitters. See also chapter 5 '[Sharing data with third parties](#)'.

### 4.4.3.3. Accident management

- **What does this purpose entail?**  
Where applicable, we process your Personal Data 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 to our customer services department, (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 in processing this data.

○ **Which Personal Data do we process for this purpose?**

For this purpose, we process the following Personal Data:

- Us: license plate number, make and model, maintenance history and operational contact with you.
- From you: your name, contact details, vehicle details, accident 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 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 Data?**

We may share certain information with dealers/garages, body repair shops, car fitters, insurance companies (which may be both affiliated and third-party insurance companies) and professional experts employed on our behalf or on behalf of third parties (such as lawyers, medical experts, investigators) for the purpose of damage or claim resolution. See also chapter 5 '[Sharing of data with third parties](#)'.

#### 4.4.3.4. Fuel card, EV charging card

○ **What does this purpose entail?**

Where applicable, our Services include a fuel management programme, which allows you to, for example, pay for your fuel at gas stations using an Ayvens issued or managed payment system. In case you have an EV, you may be provided with an EV charging card for charging your vehicle at charging points. We may also arrange for placing an EV charging station as part of the contract. This processing is required for the performance of the agreement.

○ **Which Personal Data do we process for this purpose?**

For this purpose, we process the following information: your name, e-mail address, fuel or EV charging card number, charging station number, address, phone number, license plate number, fuel information, mileage and related costs. In case of reimbursements, we may also need to collect bank account information.



- **With whom do we share your Personal Data?**  
Ayvens needs to share the information with the fuel card/EV charging solution/payment company. See also chapter 5 '[Sharing data with third parties](#)'.

#### 4.4.3.5. Traffic and parking fines management

- **What does this purpose entail?**  
The following may depend on the country where you 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 Ayvens by the authority that issued a specific traffic or parking fine (such as police or local municipality).

We process your Personal Data 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 Data 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, date and time of the offence/incident committed by you and the imposed fines.
- **With whom do we share your Personal Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

#### 4.4.4. Mobility services

##### 4.4.4.1. Roadside assistance

- **What does this purpose entail?**  
When you experience a malfunction, for example, a flat tyre or mechanical difficulties while on the road, depending on the contract we have with you, Ayvens is able to arrange roadside assistance. To this end, we work closely with contracted third parties. This processing is required for the performance of the lease agreement.
- **Which Personal Data do we process for this purpose?**  
For this purpose, we process the following information: your name, e-mail, mobile phone number, license plate number and location of where assistance was needed and provided.
- **With whom do we share your Personal Data?**  
We share your information with third parties providing on the road repair services, towing services or a replacement vehicle. See also chapter 5 '[Sharing data with third parties](#)'.



## 4.4.5. Ayvens Business Purposes

### 4.4.5.1. Management reporting

- **What does this purpose entail?**

We process Personal Data for various Ayvens business-related purposes for which we have a legitimate interest in processing this 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 analyse data that we collect when you use 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 optimise or limit our communication and marketing activities by channel and by device.

- **Which Personal Data do we process for this purpose?**

For this purpose, we process your name, e-mail address, IP address, gender, date of birth, place of residence, digits of your postal code 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 Data?**

See chapter 5 '[Sharing data with third parties](#)'.

### 4.4.5.2. Compliance with laws and legal obligations and protection of Ayvens 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 Data as appropriate or necessary

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence (CDD), money laundering, financing of terrorism and other crimes);
  - (b) as part of a 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 our affiliates, you or others;
- and



(h) to allow us to pursue available remedies or limit the damage that we may sustain.

○ **Which Personal Data 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(s) the company towards Ayvens; your correspondence with Ayvens, 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. For Counterparty Due Diligence (CDD) purposes we periodically also process investigation data based on sanctions, enforcement, adverse media, politically exposed persons and anti-slavery screening. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note that multiple (trained) employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

○ **With whom do we share your Personal Data?**

If we are required to do so by law or sectorial recommendations to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, tax authorities and investigative agencies. See also chapter 5 'Sharing data with third parties'.

## 4.5. Data pertaining to private buyers of used vehicles

### 4.5.1. Purchase

#### 4.5.1.1. Purchase of a used vehicle

○ **What does this purpose entail?**

We process your Personal Data in relation to your (potential) purchase of an Ayvens used vehicle, 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 customer and preliminary credit checks.

○ **Which Personal Data do we process for this purpose?**

For this purpose, we process your name, gender, title, (business) contact details (including your e-mail address, telephone number, name of your company), information related to your trade-in vehicle and details needed to complete the transaction, including bank account information.



- **With whom do we share your Personal Data?**

We may share this information with trade in parties or financial services partners. See also chapter 5 '[Sharing data with third parties](#)'.

## 4.5.2. Buyer contact details

### 4.5.2.1. To communicate with you

- **What does this purpose entail?**

We process your Personal Data when you contact us via one of our online contact forms (or provide information at one of our used vehicle centres). 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 is done with your consent.

- **Which Personal Data do we process for this purpose?**

For this purpose, we process your name, gender, title, (business) contact details (including your e-mail 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 Data?**

See chapter 5 '[Sharing data with third parties](#)'.

### 4.5.2.2. 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 in processing this data. With your consent or where we have a legitimate interest, we may send you marketing communication to keep you updated on events, current and future offers, opportunities and current and future products and services of Ayvens. When we contact you in regard of surveys or marketing communication, we will do so either by e-mail or by postal newsletters/brochures/magazines (postal mailings). To understand what is relevant to you, we can use manual and automatic tools to analyse your Personal Data. If you would no longer like to receive surveys or marketing communications from us, please use the opt-out options in the communications, or contact the local Ayvens entity via the [Privacy rights form](#).

- **Which Personal Data do we process for this purpose?**

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



- **With whom do we share your Personal Data?**

See chapter 5 '[Sharing data with third parties](#)'.

## 4.5.3. Ayvens Business Purposes

### 4.5.3.1. Management reporting

- **What does this purpose entail?**

We process Personal Data for various Ayvens business-related purposes for which we have a legitimate interest in processing this 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 analyse data that we collect when you use 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 optimise or limit our communication and marketing activities by channel and by device.

- **Which Personal Data do we process for this purpose?**

For this purpose, we process your name, e-mail address, IP address, gender, date of birth, place of residence, digits of your postal code 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 Data?**

See chapter 5 '[Sharing data with third parties](#)'.

### 4.5.3.2. Compliance with laws and legal obligations and protection of Ayvens 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 Data as appropriate or necessary

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence (CDD), 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 our affiliates, you or others;  
and
  - (g) to allow us to pursue available remedies or limit the damage that we may sustain.
- **Which Personal Data 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(s) the company towards Ayvens, your correspondence with Ayvens, 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. For Counterparty Due Diligence (CDD) purposes we also periodically process investigation data based on sanctions, enforcement, adverse media, politically exposed persons and anti-slavery screening. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note that multiple (trained) employees are involved to evaluate the screening results in case of a 'hit' (human intervention).
  - **With whom do we share your Personal Data?**

If we are required to do so by law or sectorial recommendations to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, tax authorities and investigative agencies. See also chapter 5 'Sharing data with third parties'.

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





## 4.6.1. Registration and purchase

### 4.6.1.1. Registration as a professional trader

- **What does this purpose entail?**

To be able to purchase an Ayvens used vehicle at an auction or purchase a vehicle via our car remarketing website(s), Traders need to be registered with Ayvens 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 Data do we process for this purpose?**

For this purpose, we process your name, contact details (including your e-mail address, telephone number), your proof of identity and information related to your company including Chamber of Commerce document and VAT certificate.
- **With whom do we share your Personal Data?**

See chapter 5 '[Sharing data with third parties](#)'.

### 4.6.1.2. Purchase of an Ayvens used vehicle

- **What does this purpose entail?**

We process your Personal Data in relation to your (potential) purchase of an Ayvens used vehicle and/or other related Services via an auction or via our car remarketing website(s). This includes the execution of the purchase agreement, the delivery and the settlement of the payment transaction. This processing is based on our legitimate interest (and also relates to the providing of Services under the conclusion and performance of the purchase agreement).
- **Which Personal Data do we process for this purpose?**

For this purpose, we process your name, contact details (including your e-mail address, telephone number), your proof of identity and information related to your company including Chamber of Commerce document and VAT certificate, details needed to complete the transaction, including bank account information.
- **With whom do we share your Personal Data?**

See chapter 5 '[Sharing data with third parties](#)'.

## 4.6.2. Contact with Traders



### 4.6.2.1. To communicate with you

- **What does this purpose entail?**  
We process your Personal Data when you contact us via one of our online contact forms (or provide information at one of our used vehicle centres). 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 Data do we process for this purpose?**  
For this purpose, we may process your name, business contact details, correspondence with Ayvens pertaining to your question/request and all other Personal Data you provide to us and/or which is necessary to appropriately respond to you.
- **With whom do we share your Personal Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

### 4.6.2.2. For surveys or other (marketing) communication

- **What does this purpose entail?**  
We process your Personal Data when we send you a survey to request your feedback on our Services for which we have a legitimate interest in processing this data. With your consent or where we have a legitimate interest, we may send you marketing communication to keep you updated on events, current and future offers, opportunities and current and future products and services of Ayvens.  
When we contact you in regard of surveys or marketing communication, we will do so either by e-mail or by postal newsletters/ brochures/magazines (postal mailings). If you would no longer like to receive surveys or marketing communications from us, please use the opt-out options in the communications, or contact the local Ayvens entity via the Privacy Rights form.
- **Which Personal Data do we process for this purpose?**  
For this purpose, we process your name, address, e-mail address and interests (as indicated by you).
- **With whom do we share your Personal Data?**  
See chapter 5 '[Sharing data with third parties](#)'.



## 4.6.3. Ayvens Business Purposes

### 4.6.3.1. Management reporting

- **What does this purpose entail?**

We process Personal Data for various Ayvens business-related purposes for which we have a legitimate interest in processing this 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 analyse data that we collect when you use 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 optimise or limit our communication and marketing activities by channel and by device.

- **Which Personal Data do we process for this purpose?**

For this purpose, we process your name, e-mail address, IP address, gender, date of birth, place of residence, digits of your postal code 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 Data?**

See chapter 5 '[Sharing data with third parties](#)'.

### 4.6.3.2. Compliance with laws and legal obligations and protection of Ayvens assets and interests

- **What does this purpose entail?**

- (a) to comply with a legal obligation or where we have a legitimate interest, we process your Personal Data as appropriate or necessary
  - (b) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence (CDD), money laundering, financing of terrorism and other crimes);
  - (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 our affiliates, you or others;
- and



(h) to allow us to pursue available remedies or limit the damage that we may sustain.

○ **Which Personal Data 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(s) the company towards Ayvens, your correspondence with Ayvens, 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. For counterparty due diligence (CDD) purposes we also periodically process investigation data based on sanctions, enforcement, adverse media, politically exposed persons and anti-slavery screening. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note that multiple (trained) employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

○ **With whom do we share your Personal Data?**

If we are required to do so by law or sectorial recommendations to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, tax authorities and investigative agencies. See also chapter 5 'Sharing data with third parties'.

## 4.7. Data pertaining to suppliers

### 4.7.1. Supplier account management

#### 4.7.1.1. To provide, manage and administer the Supplier account

○ **What does this purpose entail?**

We process your Personal Data to handle the day-to-day management and administration of Supplier accounts, such as maintaining contracts. And also to keep you informed of all important developments regarding the Services and other information important to 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 Data 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 Data?**

See chapter 5 '[Sharing data with third parties](#)'.

#### 4.7.1.2. To communicate with you

- **What does this purpose entail?**

You can contact us by various means (such as e-mail or telephone, or via our website). In that case we use your Personal Data 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 Data do we process for this purpose?**

For this purpose, we may process your name, business contact details, correspondence with Ayvens 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 Data?**

See chapter 5 '[Sharing data with third parties](#)'.

#### 4.7.1.3. For surveys or other (marketing) communication

- **What does this purpose entail?**

We process your Personal Data to send you surveys, for which we have a legitimate interest in processing this 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, current and future offers, opportunities and current and future products and services of Ayvens. We send you such surveys in the form of either a periodic e-mail or an e-mail 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 communications from us, please use the opt-out options in the communications, or contact the local Ayvens entity via the [Privacy rights form](#).

- **Which Personal Data 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 Data?**

See chapter 5 '[Sharing data with third parties](#)'.

#### 4.7.2. Ayvens Premises



### 4.7.2.1. Access to and security control of Ayvens premises

- **What does this purpose entail?**  
We may process your Personal Data 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 protection of our assets).
- **Which Personal Data do we process for this purpose?**  
For this purpose, we may process your name, 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 CCTV.
- **With whom do we share your Personal Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

### 4.7.3. Supplier reporting

#### 4.7.3.1. Fleet Reporting Tool

- **What does this purpose entail?**  
We provide a designated fleet reporting tool. Suppliers' 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 agreement that we have with the Supplier).
- **Which Personal Data do we process for this purpose?**  
For this purpose, we process contact details and job title of Suppliers' contact persons and login details (e.g. username and password).
- **With whom do we share your Personal Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

### 4.7.4. Ayvens Business Purposes

#### 4.7.4.1. Management reporting

- **What does this purpose entail?**



We process Personal Data for various Ayvens business-related purposes for which we have a legitimate interest in processing this 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 analyse data that we collect when you use 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 optimise or limit our communication and marketing activities by channel and by device.

- **Which Personal Data do we process for this purpose?**  
For this purpose, we may process your name, e-mail address, your IP address, gender, date of birth, place of residence, digits of your postal code 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 Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

#### 4.7.4.2. Compliance with laws and legal obligations and protection of Ayvens 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 Data as appropriate or necessary
  - (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence (CDD), 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 our affiliates, you or others;  
and
  - (g) to allow us to pursue available remedies or limit the damage that we may sustain.
- **Which Personal Data 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 Ayvens wants to do business with; we also process the name, address, job title, signature and the date, place and country of birth of the person(s) who represent(s) the counterparty towards Ayvens, your correspondence with Ayvens, the services you render and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph. For counterparty due diligence (CDD) purposes we also periodically process investigation data based on sanctions, enforcement, adverse media, politically exposed persons and anti-slavery screening. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note that multiple (trained) employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

○ **With whom do we share your Personal Data?**

If we are required to do so by law or sectorial recommendations to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, tax authorities and investigative agencies. See also chapter 5 'Sharing data with third parties'.





## 4.8. Data pertaining to Business Partners

### 4.8.1. Business partner account management

#### 4.8.1.1. To provide, manage and administer the Supplier account

- **What does this purpose entail?**  
We process your Personal Data to handle the day-to-day management and administration of Business Partner accounts, such as maintaining contracts. And also to keep you informed about the arrangements between us, other information important for the Business Partner Contract and Account. This processing is based on the agreement that we have with you or based on a legal obligation.
- **Which Personal Data do we process for this purpose?**  
For this purpose, we may process your business contact details.
- **With whom do we share your Personal Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

#### 4.8.1.2. To communicate with you

- **What does this purpose entail?**  
You can contact us by various means (such as e-mail or telephone). In that case we use your Personal Data to answer your question/request. We can also contact you, for example, regarding day-to-day management and administration of your Business partner account. This processing is based on the agreement that we have with you or with your consent.
- **Which Personal Data do we process for this purpose?**  
For this purpose, we may process your business contact details, correspondence with Ayvens pertaining to your question/request and all other data you provide to us and/or which is necessary to appropriately respond to you.
- **With whom do we share your Personal Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

#### 4.8.1.3. For surveys or other (marketing) communication

- **What does this purpose entail?**  
We process your Personal Data to send you surveys, for which we have a legitimate interest in processing this 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, current and future offers, opportunities and current and future products and services of Ayvens.



We send you such surveys in the form of either a periodic e-mail or an e-mail 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 communications from us, please use the opt-out options in the communications, or contact the local Ayvens entity via the [Privacy rights form](#).

- **Which Personal Data 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 Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

## 4.8.2. Ayvens Premises

### 4.8.2.1. Access to and security control of Ayvens premises

- **What does this purpose entail?**  
We may process your Personal Data 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 protection of our assets).
- **Which Personal Data do we process for this purpose?**  
For this purpose, we may process your name, 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 CCTV.
- **With whom do we share your Personal Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

## 4.8.3. Business Partner reporting

### 4.8.3.1. Fleet Reporting Tool

- **What does this purpose entail?**  
We provide a designated fleet reporting tool. Business Partners' 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, 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 agreement that we have with the Business Partner).



- **Which Personal Data do we process for this purpose?**  
For this purpose, we process contact details and job title of Business Partner's contact person and login details (e.g. username and password).
- **With whom do we share your Personal Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

## 4.8.4. Ayvens Business Purposes

### 4.8.4.1. Management reporting

- **What does this purpose entail?**  
We process Personal Data for various Ayvens business-related purposes for which we have a legitimate interest in processing this 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 analyse data that we collect when you use 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 optimise or limit our communication and marketing activities by channel and by device.

- **Which Personal Data do we process for this purpose?**  
For this purpose, we may process your business contact details 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 Data?**  
See chapter 5 '[Sharing data with third parties](#)'.

### 4.8.4.2. Compliance with laws and legal obligations and protection of Ayvens 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 Data as appropriate or necessary

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence (CDD), 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 our affiliates, you or others; and
- (g) to allow us to pursue available remedies or limit the damage that we may sustain.

- **Which Personal Data 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 Ayvens wants to do business with; we also process the name, address, job title, signature and the date, place and country of birth of the person(s) who represent(s) the counterparty towards Ayvens, your correspondence with Ayvens, the services you render and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph. For counterparty due diligence (CDD) purposes we also periodically process investigation data based on sanctions, enforcement, adverse media, politically exposed persons and anti-slavery screening. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note that multiple (trained) employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

- **With whom do we share your Personal Data?**

If we are required to do so by law or sectorial recommendations to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, tax authorities and investigative agencies. See also chapter 5 '[Sharing data with third parties](#)'.

## 4.9. Data pertaining to Tripp users

For which purposes do we use your data?

### 4.9.1. Signing up

#### 4.9.1.1. To accept you as a customer



- **What does this purpose entail?**  
We collect information when you sign up via our Platform as a customer. You rent a car or e-bike or other vehicle (hereinafter referred to as the 'Vehicle') through a booking in the Tripp app or online portal (hereinafter referred to as the 'Platform'). The app is required for access to the Vehicle. Before using Tripp (hereinafter referred to as the 'Service'), we ask you offer proof of identity. Ayvens requires your personal data to use these services. This processing is necessary to perform the Service and for the assessment and acceptance of you as a customer. Or the processing is based on your consent including your identification and authentication.
- **Which Personal Data do we process for this purpose?**  
We collect your name, gender, title, contact details such as (e-mail) address and phone number, date of birth, driving licence, an authentication photo to compare with the photo on your driving licence, payment details, credit card details, bank account number and the consent you give.
- **With whom do we share your Personal Data?**  
We only share your information with third parties with whom we have an agreement. For example, for Tripp we have agreements with a payment service provider, the party that manages the platform for us and the party responsible for performing the identification and customer acceptance check. See also chapter 5 '[Sharing data with third parties](#)'.

#### 4.9.1.2. For the Tripp Platform

- **What does this purpose entail?**  
We offer the Platform to rent a Vehicle. Through the Platform, you can register, make the reservation, make the payment, find practical information about your Vehicle, report damage and contact our customer services department. This processing is required for the performance of the Service.
- **Which Personal Data do we process for this purpose?**  
For this, we use your name and contact details and data for identification and authentication purposes including your e-mail address, phone number, date of birth and login details. But also your trip registration and GPS information of the trip you make, the pick-up location and return location, the amount to be paid, the date of payment. But also your smartphone's IP address, domain name and location tracker, date and time of access, duration of visit, phone type and phone ID. Bank and credit card details are collected and processed directly by the payment service provider.
- **With whom do we share your Personal Data?**  
We only share your information with third parties with whom we have an agreement. For example, for Tripp we have agreements with a payment service provider, the party managing the platform for us and the party responsible for performing the identification and customer acceptance check. See also chapter 5 '[Sharing data with third parties](#)'.



## 4.9.2. Contact

### 4.9.2.1. To communicate with you

- **What does this purpose entail?**

You can contact us by various means (such as e-mail or telephone, or via our website). In that case we use your Personal Data to answer your question/request. We may also contact you about the Service ourselves. This processing is required for the performance of the Service.

- **Which Personal Data do we process for this purpose?**

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

- **With whom do we share your Personal Data?**

We only share your information with third parties with whom we have an agreement. For example, for Tripp we have agreements with a payment service provider, the party managing the platform for us and the party responsible for performing the identification and customer acceptance check. See also chapter 5 '[Sharing data with third parties](#)'.

### 4.9.2.2. For surveys or other (marketing) communication

- **What does this purpose entail?**

We use your personal data when we send you periodic surveys to collect feedback on our services. And for surveys on other services related to the Vehicle, where we have a legitimate interest in processing this data. With your consent or where we have a legitimate interest, we may send you marketing communication, to inform you of events, special offers, opportunities and current and future products and services of Ayvens. When we contact you for the purposes mentioned above, we will do so either by e-mail or by postal newsletters/ brochures/magazines (postal mailings). If you would no longer like to receive surveys or marketing communications from us, please use the opt-out options in the communications, or contact us via the [Privacy Rights form](#).

- **Which Personal Data do we process for this purpose?**

For this purpose, we process your name, your address, your e-mail address and topics you may be interested in (as may be indicated by you on our website or on the Platform).

- **With whom do we share your Personal Data?**



See chapter 5 '[Sharing data with third parties](#)'.

## 4.9.3. Vehicle services

### 4.9.3.1. Use of the vehicle

- **What does this purpose entail?**

We process your personal data for registering the use of the Vehicle and handling the rental of the Vehicle. This is necessary to perform the Service for you. We record the start and end of the rental including the location of the Vehicle. We also process your data in case of incidents such as fines, damage, accidents and delayed returns.
- **Which Personal Data do we process for this purpose?**

For this purpose, we use your name, address, e-mail address, license plate number, maintenance history, rental date and rental period, mileage, rental price, rental history, vehicle details, payment and transaction data. We also process car location data.
- **With whom do we share your Personal Data?**

We only share your information with third parties with whom we have an agreement. For example, for Tripp we have agreements with a payment service provider, the party managing the platform for us and the party responsible for performing the identification and customer acceptance check. See also chapter 5 '[Sharing data with third parties](#)'.

### 4.9.3.2. Accident management

- **What does this purpose entail?**

We process your Personal Data 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 with our customer services department or via the platform, (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 Service. We may also use the information received for assessing damage repairs in our damage handling and risk retention policies, for which we have a legitimate interest in processing this data.
- **Which Personal Data do we process for this purpose?**

For this purpose, we collect the following Personal Data:

  - Us: license plate number, make and model, maintenance history and operational contact with you.
  - From you: name, contact details, vehicle details, accident 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 injuries if any).



- 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 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 Data?**  
For damage and claim resolution we may share certain information with car dealers/garages, body repair shops, car fitters, car insurance companies (both affiliated and third-party insurance companies) and professional experts employed on our behalf or on behalf of third parties (such as lawyers, medical experts, investigators). See also chapter 5 'Sharing of data with third parties'.

#### 4.9.3.3. Traffic and parking fines management

- **What does this purpose entail?**  
As the registered owner of the Vehicles, traffic and/or parking fines are usually sent to Ayvens by the authority that imposed a particular traffic or parking fine (such as police or local municipality). Ayvens then forwards them to you. If the offence took place in another country, the processing may take place in a different way. We use your Personal Data for the purpose of processing and managing the payment of the fine. This processing is required for the performance of the Service.
- **Which Personal Data 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, date and time of the offence/incident committed by you and the imposed fines.
- **With whom do we share your Personal Data?**  
See chapter 5 'Sharing data with third parties'.

#### 4.9.3.4. Fuel card or charging card

- **What does this purpose entail?**  
A fuel card or charging card is available through Tripp to refuel or charge at charging points. This processing is required for the performance of the Service.





- **Which Personal Data do we process for this purpose?**  
For this purpose, we collect the following information: your name, contact information, e-mail address, fuel or EV charging card number, license plate number, fuel information, mileage and related costs.
- **With whom do we share your Personal Data?**  
Ayvens needs to share information with the fuel and EV charging solution/payment operator. See also chapter 5 '[Sharing data with third parties](#)'.

## 4.9.4. Mobility services

### 4.9.4.1. Roadside assistance

- **What does this purpose entail?**  
When you experience a malfunction, for example a flat tyre or mechanical difficulties while on the road, depending on the contract we have with you, Ayvens may arrange roadside assistance. To this end, we work closely with contracted third parties. This processing is required for the performance of the lease agreement.
- **Which Personal Data do we process for this purpose?**  
For this purpose, we process the following information: your name, e-mail, mobile phone number, license plate number and location of where assistance was needed and provided.
- **With whom do we share your Personal Data?**  
We share your information with third parties providing on the road repair services, towing services or a replacement vehicle. See also chapter 5 '[Sharing data with third parties](#)'.



## 4.9.5. Ayvens Business Purposes

### 4.9.5.1. Management reporting

- **What does this purpose entail?**

We process Personal Data for various Ayvens business-related purposes for which we have a legitimate interest in processing this 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 analyse data that we collect when you use 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 optimise or limit our communication and marketing activities by channel and by device.

- **Which Personal Data do we process for this purpose?**

For this purpose, we may process your business contact details 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 Data?**

See chapter 5 '[Sharing data with third parties](#)'.

### 4.9.5.2. Compliance with laws and legal obligations and protection of Ayvens 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 Data as appropriate or necessary

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence (CDD), 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 our affiliates, you or others; and



(g) to allow us to pursue available remedies or limit the damage that we may sustain.

○ **Which Personal Data 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 Ayvens wants to do business with; we also process the name, address, job title, signature and the date, place and country of birth of the person(s) who represent(s) the counterparty towards Ayvens, your correspondence with Ayvens, the services you render and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph. For counterparty due diligence (CDD) purposes we also periodically process investigation data based on sanctions, enforcement, adverse media, politically exposed persons and anti-slavery screening. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note that multiple (trained) employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

○ **With whom do we share your Personal Data?**

If we are required to do so by law or sectorial recommendations to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, tax authorities and investigative agencies. See also chapter 5 '[Sharing data with third parties](#)'.



# 5 Sharing data with third parties

In addition to what is indicated for each purpose above regarding who has access to Personal Data under the control of Ayvens, we may also share Personal Data:

In addition to what is indicated for each purpose above about the sharing of Personal Data, we may also share Personal Data:

- **within the Ayvens Group for the purposes described in this Statement.**
  - Axus Nederland N.V. may share Personal Data with the group of companies to which it belongs, including ALD SA, Société Generale and other Ayvens companies.
- **to our third-party service partners, suppliers, to enable the Services they provide to you and to us.**
  - In order to provide you with our Services, we often work closely with service partners and service providers. Our independent service partners help us with providing our leasing and other Services to you, and include car dealerships, car maintenance providers, body repair shops, replacement transport Services and roadside assistance providers, but also rental service companies and the administrators of our driver safety programs. Car dealerships and suppliers of (electric) cars may need personal contact details of a Driver to activate a personal account for the Driver, otherwise the car will not function or not function properly.
  - Service providers are companies that we engage and that support us in carrying out our business activities, for example helping us to maintain our IT network and related infrastructure, and security and access control of our premises or Services related to HRM, Marketing and Finance.

We also use and disclose your Personal Data as necessary or appropriate, especially when we have a legal obligation or legitimate interest in doing so:

- **To comply with applicable law and regulations.**
  - This can include laws outside your country of residence.
- **To cooperate with public and government authorities.**
  - To respond to a request or to provide information or because we believe it 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 or because we believe it is important.
- **For other legal reasons.**
  - To enforce our terms and conditions.



- To protect our rights, privacy, safety or property, and/or that of our subsidiaries, you or others; and
- **In connection with a sale or business transaction.**
  - We have a legitimate interest in disclosing or transferring your Personal Data to a third party in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of any bankruptcy or similar proceedings. Such third parties may include, for example, an acquiring entity and its advisors.

In addition to what is indicated for each purpose above about the sharing of Personal Data, we may also share Personal Data:

- **within the Ayvens Group for the purposes described in this Statement.**
  - Axus Nederland N.V. may share Personal Data with the group of companies to which it belongs, including ALD SA, Société Generale and other Ayvens companies.
- **to our third-party service partners, suppliers, to enable the Services they provide to you and to us.**
  - In order to provide you with our Services, we often work closely with service partners and service providers. Our independent service partners help us with providing our leasing and other Services to you, and include car dealerships, car maintenance providers, body repair shops, replacement transport Services and roadside assistance providers, but also rental service companies and the administrators of our driver safety programs. Car dealerships and suppliers of (electric) cars may need personal contact details of a Driver to activate a personal account for the Driver, otherwise the car will not function or not function properly.
  - Service providers are companies that we engage and that support us in carrying out our business activities, for example helping us to maintain our IT network and related infrastructure, and security and access control of our premises or Services related to HRM, Marketing and Finance.

We also use and disclose your Personal Data as necessary or appropriate, especially when we have a legal obligation or legitimate interest in doing so:

- **To comply with applicable law and regulations.**
  - This can include laws outside your country of residence.
- **To cooperate with public and government authorities.**
  - To respond to a request or to provide information or because we believe it 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 or because we believe it is important.
- **For other legal reasons.**
  - To enforce our terms and conditions.
  - To protect our rights, privacy, safety or property, and/or that of our subsidiaries, you or others; and
- **In connection with a sale or business transaction.**
  - We have a legitimate interest in disclosing or transferring your Personal Data to a third party in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of any bankruptcy or similar proceedings.



Such third parties may include, for example, an acquiring entity and its advisors.





## Why Personal Data may be transferred to third countries

Ayvens is a global service provider that has customers and branches around the globe. Your Personal Data may be stored and/or processed in a country other than the one you reside in.

Some of the non-EEA countries are considered to provide for an adequate level of protection of your Personal Data, according to EU standards. You can find a list of these 'adequate countries' [here](#). For the transfer of Personal Data to other countries, Ayvens has put in place adequate measures to protect your Personal Data, such as Standard Contractual Clauses.



# 7 Children's privacy

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







## Do we use your data for other purposes?

We may also use your Personal Data for a purpose other than the initial purpose. This is subject to the condition that the secondary purpose is in line with the initial purpose. Among other things, the following factors are taken into account: are the purposes clearly related, is the secondary purpose appropriate and/or expected, was the Personal Data obtained directly from you or in another way, what kind of Personal Data is covered by the secondary purpose, what would be the implications for you, and what data protection measures are applied when using your data for the secondary purposes.



# 9 How long will we keep your data?

Personal Data of data subjects will be kept for the period necessary to fulfil the purposes described in this Statement unless a longer retention period is required or permitted by law.

The criteria applied to determine the applicable retention periods are: the duration of a relationship and providing the Services to you (for example for as long as you use or lease an Ayvens vehicle), as required by a legal obligation to which we are subject and as advisable in light of our legal position, such as in regard of applicable statutes of limitations, litigation or regulatory investigations. After the relevant retention period, Ayvens will either anonymise or purge your Personal Data.





# How do we secure your Personal Data?

We seek to use appropriate organisational, technical and administrative measures to protect Personal Data within our organisation, in accordance with applicable privacy and data protection laws and regulations. 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, please notify us thereof immediately. See chapter 12 "[Contacting us and exercising rights](#)".



# 11 Changes to this Privacy Statement

We reserve the right to amend this Statement at any time in order to, for instance, address future developments of Ayvens or changes in our industry or in legal trends. The 'Last Updated' legend at the top of this Statement indicates when this Statement was last revised.





# Contacting us and exercising rights

Please contact our Data Protection Officer via [this link](#) if you have any questions or concerns about how Ayvens processes your Personal Data, if you would like to exercise your right to request access, correct, suppress or delete Personal Data about you or request that we cease using it (right to object), withdraw your consent or if you would like to request a copy or transfer of your Personal Data. We will respond to your request consistent with applicable law.

Please note that we may not be required to comply (or fully comply) with your request. Applicable laws or regulations may impose conditions or restrict certain of such rights. For instance, for as long as we have a relationship with you, or where Personal Data is kept in a backup system to prevent loss and the data purging cycle is different than applicable to our active data. In those circumstances, we will write to you explaining why we are unable to comply at that moment or we will comply at a later stage when the backup is overwritten.

In your request, please clarify what Personal Data you would like to access or have changed or deleted, or otherwise let us know what limitations you would like to put on our use of your Personal Data.

For your protection, we fundamentally only implement requests with respect to the information associated with the particular e-mail address as you used on the contact form. We may request additional information necessary to verify your identity before implementing your request. Please note that certain Personal Data may be exempt from such requests pursuant to applicable data protection laws or other laws and regulations.

## *Questions?*

If you have any questions or complaints about this Statement, or want to exercise your rights, please use the [Privacy rights form](#) to contact us. You may also contact our Data Protection Officer by e-mail at [privacy.nl@ayvens.com](mailto:privacy.nl@ayvens.com) or by post: attn. Compliance & Privacy Department, PO Box 3001, 1300 EB Almere.

As e-mail traffic is not always secure, please do not include sensitive information in your e-mails to us.

You may also lodge a complaint with a data protection authority for your country or region, or in the place of the alleged infringement. Here is [a link](#) to the national data protection authorities located in the European Union and the European Economic Area.





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