

# ALD AUTOMOTIVE

## DATA PRIVACY POLICY

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### Purpose

Your privacy is important to us. This Data Privacy Policy aims to explain how we collect, store, use and disclose your personal information whenever you use our products and services, our websites or interact with **ALD SA** or **ALD Automotive AS** in Norway.

This Data Privacy Policy also aims to spell out the conditions that govern how we process and protect that information.

### General principles

ALD Automotive understands your concerns regarding the confidentiality of your personal information. Below we describe how we acquire and use that information and outline your rights. Please read this carefully, so that the process is as fair, transparent and secure as possible.

#### The following principles are central to how we process your personal information

- **Transparency and fairness:** When we collect and process your personal information, we inform you as to who collects and receives these data, and the reasons for this. When required by law, we always seek your prior consent (e.g. before collecting any sensitive information or sending any direct marketing material). We never use your personal information for purposes that are incompatible with the purposes outlined here.
- **Legitimacy:** ALD Automotive does not collect or process personal information without a lawful reason. We use your personal information only for appropriate business purposes (e.g. to provide services, manage relationships with customers, manage customer vehicle fleets, and perform accurate invoicing, or for marketing activities, profiling to better serve customers, to conduct satisfaction surveys or draft reports and comply with our legal obligations).
- **Minimization:** We only collect the personal information strictly necessary for data processing, as set out in this document. We collect sensitive information only where relevant. We take all reasonable measures to ensure that your personal data on record is accurate, complete and up to date.
- **Privacy:** We endeavor to ensure privacy when implementing personal data processing. To this end we also carry out privacy impact assessments to ensure that our safeguards are appropriate and that your information is protected.

### How long do we keep your personal information?

We retain your personal information related to performance of a contract with ALD Automotive, in accordance with the statute of limitations regarding claims subject to civil law.

In case of **litigation**, we may keep your personal information until the end of such legal action, including any potential periods for appeal. We will then either delete or archive it according to the law in force.

For marketing purposes, the information is kept for the period of validity of the consent and for one further year since our last contact.

For other purposes, including statutory documentation and compliance with legal obligations, the information is retained as long as required by law.

In any event, your personal information will **not be kept in a form that allows you to be identified** for any longer than necessary by ALD Automotive for achieving the purposes for which it was collected or processed, or according to the relevant laws in force.

## How do we ensure the security and integrity of your personal information?

We protect your data through **technical and organizational security measures** (including education and training of relevant personnel) against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing.

**Only those teams and employees** who need to know your information within our company can access it. We make sure to implement administration rights and policies within our company, and we take all measures to ensure that employees, advisers and service providers keep your files confidential.

## How can you express your preferences on the use of your personal information?

To exercise the rights set out in the following section at any time, please contact ALD Automotive's Data Protection Correspondent at [data\\_protection.norway@aldautomotive.com](mailto:data_protection.norway@aldautomotive.com) who will handle your request.

**Withdrawal.** In cases where you have given your previous consent for your information to be processed, **you can withdraw that consent.** The withdrawal of consent does not affect the lawfulness of processing based on the consent before the withdrawal.

**Access.** You can **request access** to your personal information we maintain about you. If you make such a request, we will provide you with all the information on the purposes of the processing, categories of data processed, categories of recipients, data retention term, your rights to rectify, delete or restrict the data accessed if applicable, etc. For repeated inquiries regarding information about processing of personal information and disclosure of this information, we will impose an administration fee with of NOK 1,500 incl. VAT.

**Portability.** You can also obtain a copy of any personal information that we hold about you in our records in a format compatible and structure to allow you to exercise your right to **data portability.**

**Restriction.** You can **request a restriction** in the following cases:

- for a period enabling ALD Automotive to verify the accuracy of your personal data in the event you contest the accuracy of your personal information;
- if the processing is unlawful and you wish to restrict your personal information rather than deleting it;
- if you wish ALD Automotive to keep your personal information because you need it for your defense in the context of legal claims;
- if you have objected to the processing but ALD Automotive needs to check whether it has legitimate grounds for such processing which may override your own rights.

**Rectification / Erasure.** You may also request that we **correct, amend, erase, any information** which is incomplete, out of date or inaccurate.

You can request the deletion of your personal information in the following cases:

- if your personal information is no longer necessary for the purpose of the data processing;
- if you have withdrawn your consent for data processing based exclusively on such consent;
- if you objected to the data processing;
- if the personal information must be erased to comply with a legal obligation applicable to ALD Automotive. We will take reasonable steps to inform other ALD Automotive entities which might be involved in the data processing of such erasure.

**Objection.** In some cases, you have the right to object to our otherwise legitimate processing of your personal information. You may at any time object to your personal data being processed for direct marketing purposes or profiling to send you targeted advertising.

**Complaint.** You also have the right to **lodge a complaint** with the competent supervisory authority.

You can also provide your instructions regarding the storage, deletion or disclosure of your personal information **after your death**. Such instructions may be general or specific.

## Specific conditions concerning your personal data

### What activities and people are concerned by data collection?

This Policy applies to **all sources of data** collected and processed by ALD Automotive globally in the context of various Group activities such as corporate car lease, private car lease, E-bike lease, sales locations, third-party sources, use of our websites or mobile applications, and all offline processing activities.

We may collect and process your personal information **if you are among the following categories**: drivers of leased cars or E-bikes, business-to-business customers' contact, buyers of used cars through ALD Carmarket, lessees who enters into lease agreements with ALD Automotive AS, partners, dealers, geographical partners, prospects, fleet managers, shareholders, managers, etc.

### Who controls the data?

In Norway, ALD Automotive AS carries out the data processing activities described above. This section applies to the processing of your personal information by ALD Automotive as **data controller**.

ALD Automotive has the following contact information:

#### **ALD Automotive AS**

Address: Holtet 45, 1368 Stabekk

Postal address: Postboks 64, 1324 Lysaker

Phone: + 47 67 10 87 00

E-mail: [support.no@aldautomotive.com](mailto:support.no@aldautomotive.com)

At ALD Automotive, the Data Protection Correspondent responsible for your personal information can be contacted at: [data\\_protection.norway@aldautomotive.com](mailto:data_protection.norway@aldautomotive.com)

### How and why do we use your personal information?

ALD Automotive AS uses your personal information to **offer you better services** and the collection and processing of personal data is mainly for the conclusion and fulfillment of agreements and the providing of services and offers related to these agreements..

Therefore ALD Automotive AS may use your personal information in the following cases:

- (a) When necessary for **contractual purposes**
  - (i) on a **general level** (ALD Automotive Affiliates), to manage the commercial relationship with you and your company, respond to estimate requests, open customer accounts, fulfill your orders for services and for related activities, manage events, send you communications related to your contract, respond to your inquiries and requests for verifications, provide customer service, account

management, support and related training of our personnel involved in such activities, and to provide other services related to your account;

- (ii) for **white-label partners**: for fleet management services with reports and widgets, for key accounts, call center assistance and follow-up of international key account fleets;
  - (iii) for the **purposes of international customer relationship management** (ALD SA) in the context of car leasing activities by its subsidiaries, with clients being managed by ALD SA at a global level, to perform satisfaction and quality measurement, to consolidate quality information worldwide to create a global assessment of company quality, to provide management satisfaction surveys on products, services or contents, and to follow-up customer relation claims and after-sale service;
  - (iv) to provide **customer satisfaction surveys** to professional traders about the remarketing of leased cars service (ALD Automotive Affiliates) via the online platform to market used cars coming from the leasing contracts).
  - (v) to perform **financial reporting** to ALD executives (Sales, Procurement, Finance & Risk, Pricing, Insurance), including invoicing consolidation and profitability targets, operational performance of ALD group, procurement and litigation.
  - (vi) to provide drivers with **car monitoring applications** (e.g. Ecodrive) or provide managers with fleet management tools;
  - (vii) to report to clients on customer satisfaction **survey results**.
- (b) With your **informed knowledge and consent**
- (i) **Marketing purposes**: we may use your information to contact you, subject to your consent when applicable, about new offers or services and special offers we think you will find valuable, or to send you marketing communications or newsletters; we may analyze your client profile and preferences, and perform multichannel marketing campaigns via automated tools, contact you via SMS, email, or send you brochures;
  - (ii) **Customer satisfaction**: based on targeted marketing tools and analysis, we may send you qualitative surveys for our products and services;
  - (iii) We may also invite you to participate in marketing events, games, or quizzes, through our mobile applications and/or websites.
  - (iv) **Websites, Cookies & Newsletters**: we may collect information through cookies to provide us with an enhanced experience and improve your browsing experience notably to store your preferences and parameters to save you time, (such as languages preferences), enable log in, fight against fraud, and analyze the performance of our website and services.

This information helps us **enhance our web sites** and apps and better understand the products and services you would prefer.

We also use cookies for **web analytics** to measure the web sites activity and determine the areas of the web sites which are the most visited.

While we may install **functional cookies** to facilitate your visit to our web sites or apps, you can express your preferences regarding **cookies used for behavioral targeting advertising** through the privacy settings options of your browser, which should include features to prevent information from being stored on the terminal or the processing of information already stored on such terminal, unless you turn on the feature to allow such storage or processing.

For more information, please consult our Cookie Policy available at [aldautomotive.no/cookies](http://aldautomotive.no/cookies).

- (v) **Profiling:** to improve our understanding of your interests and concerns: we may use your personal information to improve our website and services, to customize your experience with us and to tailor our marketing activities to fit your needs and interests. We believe that it is also in our interest to better serve you and respond to your needs, when required under regulatory obligations
- (vi) to perform **customer screening, credit check** and **"Know Your Client"** processing in the context of white-label partnerships for international clients (i.e. ALD Automotive Affiliate clients and clients with a direct relationship to ALD SA); to perform customer rating
- (vii) we use your personal information to **maintain business records** for legal, administrative and audit purposes. We also use information to meet legal, insurance and processing requirements.

## What type of personal information do we collect and from where do we collect your personal data?

We collect the following types of personal information:

- **Identification and Contact information**, such as your name, last name, address, city, telephone/mobile number or email address;
- **Professional information**, such as your job title or professional address;
- **Financial/Credit information**, such as your Credit Acceptance Date or contract information;
- **Private details:** such as your gender, date of birth, national identity number, nationality, language(s), or personal preferences (habits, favorite car, etc.);
- **Driver data**, such as the number/copy of the driver's license, or the employee code driver;

We may also collect information about you indirectly from our business partners or social media platforms.

We collect your personal information either **directly** from you (e.g., if you create an account on one of our sites or make a purchase or applies for or enters into an agreement with ALD Automotive AS), or **passively** (e.g., when using tracking tools like browser cookies), or from third parties (e.g. vehicle register (Motorvognregisteret) through social media platforms, etc.).

## Cookies and other Tracking Tools

In order to provide you with a better experience, when you visit our website or use our mobile applications, we collect certain information by **automated means**, using technologies such as cookies, pixel tags, browser analysis tools (e.g. Google Analytics), server logs and web beacons.

If you use our web sites, we may collect information about the **browser** you are using, and your **browsing behavior**.

If you use our **mobile app**, we may collect your **GPS location**, subject to your consent when required. We might also look at how often you use the app and where you downloaded it.

### Vehicle Operations

When your company uses car leasing services with us, we may collect **information about the vehicle** (such as the vehicle registration plate, or the vehicle last revision) and the driver's behavior (such as the average speed), to provide the car leasing services in accordance with the contract and invoice you or your company].

### Legal basis for processing personal data

All collection and processing of personal data must be based on a legal basis. Your personal data may be processed in order to fulfill an agreement with you as a customer and to fulfill our commitments according to the agreement, cf. The General Data Protection Regulation Article 6, (1), point (b).

Your personal data may also be processed for marketing and customer for satisfaction purposes if you have given an explicit consent, cf. The General Data Protection Regulation Article 6, (1), point (a). We also process data about your behavior on our website, your interest in our offers and products as well as your interaction with us in order to fulfill our commitment to provide you with personal offers.

Your personal data may also be processed on the basis of an interest of balance, cf. The General Data Protection Regulation Article 6, (1), point (f) This applies, for example, in relation to enabling the fleet management services associated with the lease agreement, for the purpose of which it is necessary to communicate with the user of the car. Balancing of interests is also the legal basis for processing personal data in relation to administration and handling of insurance issues and injuries since ALD Automotive A / S has a legitimate interest in ensuring that the leased vehicle is properly insured and that any damage is reported and processed.

In some cases ALD Automotive A/S has a legal obligation to process personal data, cf. the General Data Protection Regulation Article 6, (1), point (c) for example, to comply with the requirements of accounting and taxation laws and the Anti-Money Laundering Act. All such processing of personal data is made in accordance with legislative requirements.

### Who do we share your personal information with?

We understand that you do not want us to provide your personal information directly to third parties for their own marketing purposes without your consent. However, we occasionally need to use partners or processors to provide you with the requested services and a better experience, for the purposes described above. We therefore **limit our sharing** of your personal information on a need-to-know basis as follows:

- with **internal business departments** such as sales, customer care/quality department, marketing, IT services, support and maintenance. Inside the ALD Automotive Group, we may share your personal data with other ALD Automotive entities, who may only use your personal information in compliance with this Policy.
- with our **suppliers and partners**, including, for example, retailers, repair shops, tire suppliers, fuel suppliers, etc.

- with our **service providers**, such as data hosting service providers, data administrators, located in Norway or within the European Economic Area and instructed to only use your personal information in accordance with our instructions.
- with **unaffiliated marketing partners**, but only if you have given us your consent.
- where needed to affect the **sale or transfer of business assets**, in connection with a bankruptcy proceeding, to enforce our rights, protect our property, or protect the rights, property or safety of others, or as needed support external auditing, compliance and corporate governance functions.
- when **required to do so by law**, such as in response to a subpoena, including to law enforcement agencies and courts in the countries where we operate.
- with the **insurance company** in which the vehicle is insured and to any counterparty's insurance company insofar as ALD Automotive AS may be legally required to do so.

Please note that we may also use and disclose personal information about you that is not personally identifiable i.e. personal information in an aggregate form that no longer identifies you.

### **If the collection is optional or mandatory**

When ALD Automotive A/S collects personal information directly from you and processes your information for marketing purposes, it is voluntary to provide the information. The consequences of not giving the information are that you cannot get information about offers, benefits, collaborators, etc.

When collecting and processing personal data for the purpose of entering into, fulfilling and administering the lease agreement with you or your company, it is mandatory for ALD Automotive A/S to collect the information in order to enter into and fulfill the contract. The consequences of not providing the information is that it is not possible to conclude or fulfill the lease agreement.

### **How long do we keep the personal information?**

We retain your personal information collected for the purposes and under the conditions described above and for a duration limited to what is strictly necessary.

### **How can you contact us or the supervisory authority to lodge a complaint?**

If you have any **questions, complaints, or comments** regarding this Data Privacy Policy or our information collection practices, please contact us by writing, or sending an email to ALD Automotive's Data Protection Correspondent at [data\\_protection.norway@aldautomotive.com](mailto:data_protection.norway@aldautomotive.com).

You can also lodge a complaint with the Supervisory Authority of the country where you are located if you have any concern about the conditions of processing of your personal information by ALD Automotive. In Norway, the Supervisory Authority is Datatilsynet whose contact information can be found at [www.datatilsynet.no](http://www.datatilsynet.no)

## **What happens when we change this Data Privacy Policy?**

Our Data Privacy Policy may change from time to time to reflect changes in the way we processing your personal information. However, these changes will remain fully compliant with applicable law. We encourage you to periodically review this page for the latest information on our privacy practices. We will notify you of any material changes as required by law.