

ALD AUTOMOTIVE DATA PRIVACY POLICY

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 Automotive.

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 only as long as you enjoy a **business relationship** with ALD Automotive, or the term applicable under local law since our last contact, or as required to comply with ALD Automotive's legal obligations.

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.

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?

ALD Automotive Portugal

Sintra Business Park, Zona Industrial de
Abrunheira, Ed. 2, Escritório 0C, 2710-089
Sintra, Portugal

Tel. + 351 21 092 03 00
Fax. + 351 21 092 03 36
Email: pt_info@aldautomotive.com
www.aldautomotive.pt
www.aldautomotive.com

SGALD Automotive
Sociedade Geral de Comércio e Aluguer
de Bens, S.A.
Capital Social € 10.000.000
C.R.C. Sintra e NIF: 503 188 620

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, you can send an email to privacidade@aldautomotive.com. ALD Automotive guarantees the right of reply to all data subject.

Withdrawal. In cases where you have given your previous consent for your information to be processed, **you can withdraw that consent** any moment.

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.

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. You can also object to the processing of your personal information at any time **when used for marketing purposes or profiling** to send you targeted advertising or to object to the sharing of your data with third parties or within the ALD Automotive Group.

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 leasing, private car 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, business-to-business customers' contact, partners, service providers, dealers, geographical partners, prospects, fleet managers, shareholders, managers, etc.

Who controls the data?

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

In terms of data protection, if you wish to contact ALD Automotive please send an email to privacidade@aldautomotive.com.

How do we use your personal information?

ALD Automotive uses your personal information to **offer you better services**.

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

(a) When necessary for **contractual purposes**

- (i) on a **general level** 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 of information, provide customer service, support and related training of personnel involved in such activities, and to provide other services related to client account, conduct satisfaction surveys on products, services or content and complaints follow up;
- (ii) for **white-label partners**: fleet management services with reports and widgets, for key accounts, call center assistance and follow-up of international key account fleets;
- (iii) to provide **customer satisfaction surveys** about the remarketing of leased cars service (after-sales service) via the online platform to market used cars coming from the leasing contracts).
- (iv) to perform **financial reporting** to ALD Automotive executives (Sales, Procurement, Finance & Risk, Pricing, Insurance), including invoicing consolidation and profitability targets, operational performance of ALD Automotive group, procurement and litigation.
- (v) to provide drivers with **car monitoring applications** (e.g. Ecodrive) or provide managers with fleet management tools; 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 www.aldautomotive.pt.

(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 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 SA 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?

We collect the following types of personal information:

- **Identification and Contact information**, such as your name, last name, 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, nationality, language(s), or personal preferences (habits, favorite car, etc.);
- **Your voice** when you call ALD Automotive customer services since your call may be recorded;
- **Driver data**, such as the number/copy of the driver's license and plate;

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 **passively** (e.g., when using tracking tools like browser cookies), or from third parties (e.g. through social media platforms).

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, server logs and web beacons (e.g. Google Analytics).

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**, when applicable, subject to your prior consent when required. We might also look at how often you use the app and downloaded.

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), to provide the car leasing services in accordance with the contract and invoice you or your company.

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 **service providers**, such as data hosting service providers, call centers, data administrators, located in France or within the European Economic Area and instructed to only use your personal information in accordance with our instructions.
- with **unaffiliated marketing partners**, 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.

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.

How is your personal information transferred?

Some of the countries which receive or have access to your data **may not provide the same level of data protection** as the country in which you provided the information. You may obtain a list of these countries by contacting ALD Automotive by email to privacidade@aldautomotive.com.

Your information may be transferred to, stored and processed in any country or territory where one or more of ALD SA Affiliates are located outside of the European Economic Area (in countries such as Algeria, Belarus, Brazil, Chile, China, Colombia, India, Kazakhstan, Mexico, Morocco, Peru, Russia, Serbia, Switzerland, Turkey and Ukraine for the purposes of managing customer relationship at the global level, providing unified car lease services with a globalized car fleet.

We may also transfer your personal information to the service providers involved in the provision of call center services (located in countries such as Brazil, Mexico, Turkey, Romania), data hosting, maintenance and support services (located in countries such as India, the United States), or the provision of any other tool used for the processing of our customers or prospects personal information.

Your information may be transferred to geographical partners in Argentina, Australia, El Salvador, Honduras, Guatemala, New Zealand, Nicaragua, South Africa and the United States, and for the purpose of offering you a global coverage service.

When we transfer your information, we protect and provide adequate protection for the transfer of your personal information to recipients in those countries by entering into data transfer agreements based on the European Commission standards clauses with such data recipients.

How long do we keep the personal information?

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Abrunheira, Ed. 2, Escritório OC, 2710-089
Sintra, Portugal

Tel. + 351 21 092 03 00
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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 privacidade@aldautomotive.com.

You can also lodge a complaint to the Comissão Nacional de Proteção de Dados (CNPD) if you have any concern about the conditions of processing of your personal information by ALD Automotive.

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.