

Privacy Statement Clients

Version 2018.01, of 14 May 2018

Introduction

Van Mossel Automotive Groep, Mobility services and products

J&T Autolease is part of International Car Lease Holding, a company of Van Mossel Automotive Groep.

We are a family business with nearly 70 years of experience and still very ambitious. Our promise is our navigation system: "Van Mossel offers more than you expect". It is our mission to make this a reality on a daily basis. Personal attention, reliability, the highest quality and a wide range of mobility solutions form the basis of our success.

We also live up to our promise to protect your personal data. As befits a good host, we handle your data with care. We are fair and transparent about what we do with your data, and why. Van Mossel is committed to maintaining the trust of its clients through the careful use and proper protection of the personal data we obtain. This Privacy Statement is our agreement with you, which we shall comply with. In the unlikely event of a security issue (data breach), we will make every effort to safeguard your personal data and comply with our obligation to do so.

Van Mossel Automotive Groep is a group of companies that provide mobility services and products. Our customers are private and corporate clients. We process personal data for the delivery of a vehicle, for the implementation of a lease agreement with you or your employer, for the maintenance of a vehicle, for repairing and settling damage, for replacement transport, etc. We do this for all makes our car companies carry and for all lease labels and car repair companies. We aim to offer you the best possible service and to enter into a long-term relationship with you.

To properly implement the lease agreements we have concluded, we also maintain contact with the drivers of our lease cars. To schedule appointments, to coordinate maintenance, to help drivers in the event of unexpected breakdowns, etc. Are you a lease car driver? Then you are also a customer to us. We treat your personal data with the same care, allowing us to offer you more than you expect.

This privacy statement informs you about how we handle your personal data.



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Privacy Statement of Mossel Automotive Groep (VMAG)

1. Who is responsible for processing your data?

VMAG is responsible for processing personal data. We consist of a group of car companies, car repair companies and leasing companies, as described in more detail on our website www.vanmossel.nl.

VMAG offers mobility products and services for buying, renting, leasing, customising, maintaining, repairing and car body repair of passenger cars and commercial vehicles.

We offer (potential) customers various mobility solutions, which in many cases are implemented jointly by several companies. A customer of one of the VMAG companies is therefore a customer of VMAG as a whole.

2. What are personal data?

Any information relating to an identified or identifiable natural person is considered personal data. Whether certain information is to be classified as personal data also depends on whether VMAG has legal means at its disposal of which it may reasonably be assumed that it will use these to identify a data subject.

3. Personal data we process

We process personal data when entering into and/or performing agreements to deliver, lease, rent, maintain, repair or restore vehicles by VMAG. We often receive these personal details from you, your employer and/or the leasing company of your employer. But also when you use our services in a different way and provide us with data, or enable us to record data about your interests and preferences.

If you are an existing (or potential) customer, we may collect and process the following data from you.

- Contact details: such as name, address, telephone number(s) and email addresses, gender and possibly the same details of your partner (in the case of private leasing and financing).
- Identifying data: such as date of birth, customer number, driving licence data, passport number, initial login data.
- Financial data (for leasing and financing), income/expenses, bank statements for the purpose of BKR [Credit Registration Office] testing and possible registration.
- Vehicle data, registration number, chassis number, make, model, maintenance history, history of ownership and any other data relevant to the agreement in question.
- Use and consumption of data, such as transaction data, claims, IP address or other number, communication preferences and settings, browsing behaviour, cookies, customer satisfaction data, notes and emails regarding complaints/contact moments.

4. No processing of personal data of persons under 16 years of age

Our services and products are not intended for persons under 16 years of age.

5. For what purpose and on what basis do we process your personal data?



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VMAG processes your personal data for the purposes set out below:

Purposes	Consent	Contract or offer	Statutory obligation	Legitimate interest VMAG or a third party
Entering into and/or implementing agreements to deliver, lease, rent, maintain, repair and/or restore vehicles and other related services ("customer agreements")		v		
Communicating by means of service messages with respect to services purchased, such as appointments, order status, warranty obligations, product recalls, handling complaints and requests		v		v
In certain cases, maintaining communication in order to proactively contact users in the event of vehicle defects or malfunctions or to schedule service appointments including facilitating mobility services		v		v
Being able to offer a test drive or otherwise provide a vehicle on a temporary basis. In that case, we may ask you to identify yourself by means of a valid identification document and/or, if necessary, we may require a photocopy of your properly covered driving licence or identity card/passport for the duration of the vehicle's use. We do this to establish your identity and to allow us to file a report in the event of suspicion of theft or demonstrable damage or misconduct.		v		
Contacting existing or potential customers through marketing activities based on preferences and given consent	v			
Providing services on the Internet and through app functionalities, including sending relevant commercial messages in these apps	v	v		v
Communicating with stakeholders and offering a loyalty programme	v			v



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Linking and analysing cookies from our websites to customer data known to us. We do this in order to tailor the content of our communication as closely as possible to your personal preferences	v			v
Building and maintaining our customer relationship				v
Conducting customer satisfaction surveys and market research to improve our business operations, brands, services and products. Improving the content of our communications by tailoring them to your personal preferences. (Further) developing and improving new and existing products and services				v
Contacting existing customers with respect to other services provided by VMAG; these include offers, invitations or other commercial information. You will always have the option to unsubscribe from this service. For all communications it is shown how you can do this.				v
Dispute settlement and enforcement of our rights and agreements				v
Protection of VMAG's assets and interests, access control and security, camera surveillance				v
Improving data quality using address validation technologies				v
To implement day-to-day operations, the business strategy, internal management, reports, analyses, legal affairs, data consolidation, data duplication, etc.				v
Compliance with statutory obligations			v	

6. Sharing with third parties

We sometimes share your data with third parties. We usually do this to provide the requested products and/or services. Sometimes because you have given your consent or because it is



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required by law. Or to represent our interests or those of a third party, such as the importer or manufacturer. The overview below contains more information about sharing personal data,

Sharing personal data with third parties	Consent	Contract or offer	Statutory obligation	Legitimate interest VMAG or a third party
Importers and manufacturers of the vehicles supplied by us for the purpose of entering into/ implementing customer agreements, compliance with dealer agreements and handling of warranty obligations, goodwill requests, product recalls, complaints and requests		v		v
Our other external partners such as insurance companies, claim partnerships, fuel card suppliers, roadside assistance providers, RDW, RDC, external leasing companies, car companies of non-licensed car makes, for the purpose of entering into/implementing a customer agreement and/or agreements concluded with these partners or importers		v		
With service providers, processors, we engage. For example, hosting services, online services, IT services, marketing agency, research agency, debt collection agencies. These service providers will only process personal data in accordance with VMAG's instructions and under the authority of VMAG.				v
With third parties based on your consent to contact you for car make-related information, for example importer or manufacturer	v			
If we are legally required or authorised to provide personal data to third parties			v	
Only if we are legally required to do so, may your personal data be disclosed to supervisory bodies, tax authorities and research services			v	
With (affiliated) financial service providers for the purpose of offering additional financial services such as private leasing, financing and/or insurance		v		v



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If we suspect a violation of the rights of third parties, criminal offences or abuse, we may disclose personal data to third parties who have a legitimate interest or to bodies that serve the public interest. These may also include enforcement authorities, such as the Public Prosecutor's Office or supervisors			v	v
With parties that assist VMAG in providing its services and that are not processors (for example, accountants and (legal) advisors)				v

When personal data are transferred to a recipient abroad, this usually only concerns a recipient in a country which, according to the European Commission, offers an adequate level of protection for personal data.

7. How long do we retain data for?

We retain personal data in accordance with our internal data retention policy and/or for as long as (i) you are a customer of VMAG or continue to show interest in the services of VMAG or (ii) we are legally required to retain data or (iii) we believe that we are entitled to retain data on good grounds, to the extent necessary.

8. Website visit

When you visit or use our websites, services, applications, communication services (such as email) and resources, we may use cookies, web beacons and other similar technologies to store information for the purpose of personalising advertising messages and providing you with a better, faster and more secure customer experience. If you do not want cookies, you can refuse them. For more details on the use of cookies, please refer to the cookie statements on our websites.

9. Your rights

By sending an email to privacy@van-mossel.nl you can submit one of the following requests to us. Please state in your email the specific request, your name, date of birth, address, registration number and/or customer number, allowing us to locate you in our systems. We will send you a response to the request within 30 days.

To ensure that the request is made by you, we ask you to attach a properly covered copy of your identity document with this request. By covered we mean covering/rendering unreadable the passport photo and the BSN (including in the Machine Readable Zone). Include the date and the office(s) to which the request refers on the photocopy or digital copy.

Rights of the data subjects	Consent	Contract or offer	Statutory obligation	Legitimate interest VMAG or a third party
Access	v	v	v	v
Rectify; correct or supplement	v	v	v	v
Erasure of data	v			v
Restriction of a processing operation	v			v



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Transferability of data	v	v		
Right to object				v

VMAG does not use automated individual decision-making, including profiling.

You may only exercise your rights to the extent granted by law. In some cases, we may need to retain certain information for statutory obligations, administrative purposes and/or to complete transactions that were initiated before you requested the modification or erasure.

Depending on the extent to which processing of your personal data is based on your consent, you also have the right to withdraw your consent at any time. However, withdrawal of your consent does not affect the lawfulness of any processing operation based on your prior consent before we have received such a withdrawal.

If you object to direct marketing, we will immediately stop that processing operation for you. If you object to another legitimate interest of VMAG or of a third party, we are required to investigate this and weigh up whether your interest outweighs our interest. You always have the right to lodge a complaint with the Data Protection Authority.

10. Data security and protection

VMAG takes appropriate technical and organisational measures to prevent misuse, loss, unauthorised access, undesirable disclosure and unauthorised alteration of personal data where possible. VMAG has taken both technical and organisational measures to secure your personal data. These security measures shall be reviewed periodically, for example on the basis of threats.

Unfortunately, no system for data transport or storage is guaranteed 100% secure. If you have reason to believe that your communication with us is no longer secure, please notify us immediately by contacting us at privacy@van-mossel.nl.

11. Contact

For questions and/or comments relating to this privacy statement, please contact:

Van Mossel Automotive Groep
Van Mossel Shared Services B.V. (Chamber of Commerce 18053969)
Director Operations & Compliance
Biesbosweg 14, 5145 PZ WAALWIJK
0416 82 07 41 / privacy@van-mossel.nl

Our privacy officer can be contacted by email on privacy@van-mossel.nl and by post on:

Van Mossel Shared Services B.V.
Attn: Privacy Officer
Biesbosweg 14
5145 PZ WAALWIJK
privacy@van-mossel.nl

12. Amendments

Where necessary, this privacy statement shall be amended. This privacy statement shall always show the latest date of change.

This statement was last revised on May 2018.

