

DATA PROTECTION NOTICE
(applicable from 25 May 2018)

The protection of your personal data is extremely important to the BNP Paribas Group.

This Notice is intended for the clients, direct business contacts and service providers/suppliers of BNP Paribas Lease Group Luxembourg and the persons listed in section 2 (“**you**”).

The purpose of this Notice is to provide you with detailed information on how BNP Paribas Lease Group Luxembourg S.A., 10, rue Edward Steichen, L-2540 Luxembourg (“**we**”) protect your personal data.

In our capacity as controller, we are responsible for collecting and processing your personal data for use in connection with our activities. The purpose of this Notice is to provide you with information on the personal data we collect about you, how we use such data, with whom we share them, for how long we store them, what your rights are and how you can exercise them.

Additional information may be provided to you, where appropriate, when you apply for a specific product or service.

1. Which personal data do we use?

We collect and use personal data to the extent necessary in connection with our activities, in particular in order to offer you personalised, high-quality products and services.

We may need to collect a variety of types of personal data concerning you, including in particular:

- **personal identification data** (e.g. name, address (private and business), telephone number (private and business));
- **official identification data** (e.g. ID card and passport numbers);
- **personal details** (e.g. date and place of birth, gender, marital status, nationality);
- **data relating to the composition of the household** (e.g. family situation, number of children);
- **electronic identification data** (e.g. e-mail address);
- **bank and financial identification data** (e.g. bank account details, professional activity);
- **professional and employment data** (e.g. employment, employer’s name, salary);
- **data relating to your habits and preferences:**
 - data relating to your use of our products and services (banking, financial and transactional data),
 - data from your interactions with us in our branches (meeting report), our websites, apps and pages on social media, meetings, calls, chats, e-mails, interviews, telephone conversations;
- **image recording data** (e.g. video surveillance recordings (CCTV), photos, digital photos).

As a general rule, we do not collect data relating to your racial or ethnic origins, your political opinions, your religion, your philosophical beliefs or trade union membership, your genetic data, your sex life or sexual orientation.

We only process data relating to criminal convictions and offences if we are legally required to do so.

The data concerning you that we use may be provided directly by you. In order to verify or enrich our databases, these data may be obtained from the following sources:

- BNP Paribas Group entities, including in particular BGL BNP Paribas;
- publications/databases made available by official authorities (e.g. the trade and companies register);
- our corporate clients or service providers/suppliers;
- third parties such as credit reference agencies and fraud prevention agencies, and data brokers in accordance with data protection legislation;
- websites/social media pages containing information made public by you (e.g. your own website or social media profile);
- publicly accessible third-party databases.

2. Specific cases of personal data collection, including indirect collection

In some circumstances, we may collect and use personal data concerning individuals with whom we have had (former clients and former service providers/suppliers) or could have a relationship (prospects).

We may also collect information from individuals who are not clients and with whom we do not have a direct relationship. This may be the case, for example, when your employer provides us with information about you, or when your contact details are provided to us by one of your clients, because you are for example:

- a family member of one of our clients;
- a co-borrower or guarantor;
- a legal representative (mandate/power of attorney);
- a beneficiary of a payment transaction made by one of our clients;
- a beneficiary of an insurance policy or a trust;
- a beneficial owner;
- a debtor (e.g. in the event of bankruptcy);
- a shareholder;
- a representative of a legal entity (which may be a client or service provider/supplier);
- an employee of one of our service providers/suppliers/business partners.

3. Why and on what legal basis do we use your personal data?

a. To comply with our legal and regulatory obligations

We use your personal data to comply with various legal and regulatory obligations to which we are subject, including:

- Banking and financial regulations pursuant to which we:
 - determine your credit risk score and your repayment ability,
 - monitor and report risks that we might incur;
- The fight against money laundering and terrorist financing;
- Legislation relating to international sanctions and embargoes;
- The fight against tax fraud and tax control and notification obligations.

b. To conclude a contract with you or to contact you, at your request, with a view to concluding a contract

We use your personal data to conclude and perform our leasing contracts with you, in particular to:

- manage our relationship with you;
- provide you with information on our products and services;
- assist you and respond to your needs;
- assess whether we can offer you a product or service and, where applicable, subject to which terms and conditions;
- provide products and services to our corporate clients, of which you are an employee or client.

c. To fulfil our legitimate interests

We use your personal data to roll out and develop our products and services, optimise our risk management and defend our rights, as well as for the following purposes:

- as proof of transactions;
- to analyse data for fraud prevention purposes;
- to prevent attacks on property and people;
- to ensure the security of property and people;
- IT management, including infrastructure management (e.g. shared platforms), business continuity and IT security;
- to establish anonymised statistical models, tests, for research and development, in order to optimise the risk management of the BNP Paribas Group and to improve our range of new and existing products and services;
- to personalise our offering by:



- o improving the quality of our banking, financial and insurance products and services,
- o offering you products and services that correspond to your situation and profile as defined by us.

d. To comply with your choice when we have asked you for your consent for a specific type of processing

In some cases, we need your consent in order to process your data, in particular:

- if the purposes described above lead to automated decision-making, producing legal effects for you or which significantly affects you. In that case, we will inform you separately of the logic behind said decision as well as the significance and consequences of such processing;
- if we need to carry out processing for purposes other than those described above in section 3, we will inform you and, where necessary, request your consent.

4. With whom do we share your personal data?

For the aforementioned purpose, we disclose your personal data to:

- BNP Paribas Group entities, including in particular BGL BNP Paribas (e.g. in the event of consolidated risk management);
- independent agents, intermediaries or brokers, financial institutions, banking and business partners with which we have regular dealings (e.g.: banks and insurance companies);
- service providers/suppliers providing services on our behalf;
- supervisory, financial, tax, judicial and administrative authorities, State agencies and public bodies, upon request and to the extent permitted by applicable regulations;
- some regulated professionals, such as lawyers, notaries and corporate auditors;

5. Do we transfer your personal data outside the European Economic Area?

In the event that your data are transferred outside the EEA, such a transfer will be made on the basis of a decision adopted by the European Commission, whereby the latter has recognised the country to which your data will be transferred as providing a level of protection equivalent to that existing in the EEA.

In the event that your data are transferred to a country where the level of data protection has not been recognised as adequate by the European Commission, we will establish standard contractual clauses approved by the European Commission to ensure the protection of your data.

To obtain a copy of these contractual clauses or to find out how to access them, please submit a written request as set out in section 9 of this Notice.

We may also, in specific situations, transfer your personal data on the basis of a special dispensation (e.g. for an international payment or when the transfer is necessary for the performance of a contract).

6. How long do we retain your personal data for?

We retain your personal data for as long as necessary to comply with applicable regulations, or for a period determined on the basis of our operational constraints, such as proper account keeping, efficient client relationship management, and to respond to court orders and requests from authorities and regulators.

For example, most of the personal data relating to our clients are stored throughout the period of the contractual relationship and for a period of ten years after the end of the contractual relationship.

7. What are your rights and how can you exercise them?

In accordance with the legislation applicable to your situation, you can exercise the following rights:

- **Right of access:** you can obtain information on the processing of your personal data and a copy of such data.
- **Right of rectification:** if you consider that your personal data are inaccurate or incomplete you can ask for such data to be corrected accordingly.



- **Right to erasure:** you can ask for your personal data to be erased, to the extent permitted by applicable regulations;
- **Right to restrict processing:** you can ask for the processing of your personal data to be restricted.
- **Right to withdraw your consent:** if you have given your consent to the processing of your personal data, you can withdraw such consent at any time.
- **Right to data portability:** when this right is applicable, you can ask to receive the personal data concerning you that you have provided to us, or, where technically feasible, request that such data be transferred to a third party.

You also have the right to object to the processing of your personal data on grounds relating to your particular situation. You have the absolute right to object at any time to the use of your personal data for direct marketing purposes, or for profiling purposes if such profiling relates to direct marketing.

If you wish to exercise the abovementioned rights, please send a letter or an e-mail to the address mentioned in section 9. Please include a scan/copy of your ID card for identification purposes.

In accordance with applicable regulations, in addition to the abovementioned rights, you may also lodge a complaint with the competent supervisory authority in Luxembourg: the National Commission for Data Protection (<https://cnpd.public.lu/fr.html>).

8. How to keep abreast of changes to this Data Protection Notice

In a world of continuous technological progress, we will update this Notice on a regular basis.

You can read the latest version of this document on our website and we will inform you of any material changes through our website or our other usual communication channels.

9. How to contact us

If you have any questions concerning the processing of your personal data, please contact our Data Protection Officer by letter addressed to BNP Paribas Lease Group Luxembourg – Data Protection Officer - 10, rue Edward Steichen, L-2540 Luxembourg or by e-mail to: leasing@bgl.lu. The latter will deal with your request.

For further information on cookies, please consult our "Cookies Policy", available on our website www.bgl.lu.
