

Data protection information for customers

The protection of your personal data is an important concern for the BNP Paribas-Group¹, which is why strong data protection principles have been defined for the entire Group.

This data protection information contains detailed explanations about the protection of your personal data by BNP Paribas Leasing Solutions GmbH (hereinafter "**we**").

As controller, we are responsible for the collection and processing of your personal data in connection with our business activities. With this data protection information we inform you about the personal data we collect about you, why we use and pass on such data, how long we keep it, what rights you have and how you can exercise them.

If you are interested in a particular product or service, you may receive additional information.

1. What personal data do we use?

We collect personal data, i.e. all information that identifies you or enables you to be identified, to the extent necessary within the scope of our business activities to provide you with a high-quality, individual product and service offering.

Depending on the type of products and services that the Bank offers you, the Bank processes various types of personal data about you, including

- **identity information** (e.g. full name, identity card number, passport number, nationality, place and date of birth, gender, photograph)
- **Contact information** (e.g. address, e-mail address, telephone number)
- **Information on the family situation** (e.g. marital status, children)
- **Tax information** (e.g. tax number, tax identification number, tax status)
- **Information on education and occupation** (e.g. educational level, employment, name of employer, earnings, etc.)
- **Banking, financial and transaction data, credit-worthiness data** (e.g. bank details, credit card number, money transfers, assets, credit history, debt and expenditure, rating)
- **Data about your habits and preferences:**
 - Data on the use of our products and services
 - Data on interaction with us: our offices (contact reports), our websites, use of our apps, our social media pages, connection and tracking data such as cookies, connection to online services, personal meetings, telephone calls, chat contact, e-mail, surveys, telephone conversations)
- **Video and photo surveillance data and geolocation data of financed objects**
- Information about your digital terminal (IP address, technical data and uniquely identifying data)
- Login information used to connect to the website and to the Bank's applications.

The following sensitive data may only be obtained with your express prior consent:

- **Biometric data**, e.g. fingerprints, voice or face patterns, which can be used for identification and security purposes
- Personal data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic data and data concerning sexual life or sexual orientation, are not processed by us as a matter of principle, unless we are legally obliged to do so or if this is necessary in the context of the products and services we offer.

2. Who is affected by this data protection information and from whom does the bank collect personal data?

The data we use can either be provided directly by you or come from the following sources:

- from other companies in the BNP Paribas group
- from customers or business partners
- publications/databases made available by public authorities
- Corporate customers, service providers or business partners of ours
- third parties, such as credit bureaus and pools for fraud prevention or data brokers, which are used in accordance with data protection regulations
- Websites/social media pages with information you publish (e.g. your own website or social media page) and
- Databases made publicly accessible by third parties, such as information from the press.

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

In certain cases, we may collect personal information from individuals with whom we have, may have or have had a direct relationship and use that information as appropriate. This includes, for example

• Potential customers

We may have obtained information about you although you do not have a direct relationship with us.

This may be the case, for example, if your employer has provided us with information about you or if we have received your contact details from one of our customers and you belong to one of the following groups of people, for example

- **Family members**
- **Co-applicant, guarantor**
- **Legal representatives** (authorized representatives)
- **Beneficiaries of payment transactions of our customers**
- **Beneficiaries of insurance contracts and trusts**
- **Landlord**
- **Beneficial owners**
- **Debtors of customers** (for example in the event of insolvency)
- **Shareholders**

¹ The members of BNP Paribas Group can be seen on the following website:

<https://invest.bnpparibas.com/en/consolidated-financial-statements>

- **Representatives of legal entities** (e.g. customers or service providers)
- **Employees of service providers or business partners.**

If you provide us with personal data of third parties such as those in the examples above, please remember to inform these persons that we process their personal data and refer them to this privacy information.

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

a. To meet our legal and regulatory obligations

We use your personal information to comply with various legal and regulatory obligations, including

- Banking and financial regulations, on the basis of which we:
 - take security measures to prevent abuse and fraud
 - Detect transactions that deviate from common patterns
 - Determine your creditworthiness and your ability to repay
 - monitor and report risks (financial, credit, legal, compliance or reputational risks, default risks, etc.) to which we may be exposed
 - Recording, if necessary, of telephone conversations, chats, e-mails etc.
- Responding to an official request from a competent governmental or judicial authority
- Prevention and detection of money laundering and terrorist financing, and compliance with sanctions and embargoes through the Know Your Customer (KYC) process (to identify you, verify your identity, check your data on sanctions lists, and determine your profile)
- Compliance with sanction and embargo regulations
- Combating tax evasion and meeting tax control and reporting obligations
- on the exchange of information for tax purposes
- to prevent, detect and report risks related to corporate social responsibility and sustainable development
- to detect and prevent bribery.

b. To conclude or fulfil a contract with you

We use your personal data to conclude and fulfil our contracts.

This includes, among other things, that we

- provide you with information about our products and services
- help you and answer your questions
- check whether and under what conditions we can offer you a product or service and
- Offer products and services.

c. To protect our legitimate interests

We use your personal data to market and develop our products and services, to optimise our risk management and to protect our legal rights. This includes the following activities:

- Requesting information from credit agencies with regard to your creditworthiness and transmitting data to credit agencies about your contractual obligations and the repayment status in the event of default

- Creation of transaction proofs
- Fraud prevention
- IT management, including infrastructure management (e.g. common platforms) and measures to ensure operational continuity and IT security
- Creation of individual statistical models based on the analysis of transactions, for example to better determine your creditworthiness
- Development of summary statistics, tests and models for research and development to optimise the risk management of our group of companies or to improve existing products and services or to create new products and services
- personalization of our own offer and the offer of other business units associated with us:
 - a qualitative improvement of our financial and insurance products and services;
 - the promotion of products that fit your situation and profile.

This can be achieved by:

- the segmentation of our existing and potential customers
- the analysis of your habits and preferences on the various channels (visit to our offices, e-mails or messages, visit to our website, etc.)
- the transfer of your data to another business unit associated with us, especially if you are a customer of this business unit or if you wish to become one
- matching the products or services you have already purchased or are using with other information we have about you
- the monitoring of all transactions in order to detect transactions that deviate from the usual routine.

d. To respect your choice when we have asked you for your consent to a particular data processing operation

In some cases, we need your consent and/or an exemption from banking secrecy to process your data, e.g:

- for training our employees by recording incoming calls in our call centers
- if we need to take further data processing measures for purposes other than those mentioned above, we will inform you accordingly and, if necessary, ask for your consent.

5. To whom do we pass on your personal data?

a. Exchange of information within the BNP Paribas group

We are part of the BNP Paribas Group, an integrated banking and insurance group, i.e. a group of companies that work closely together worldwide to develop and distribute various banking, financial, insurance and product services.

We share personal information about the BNP Paribas Group for economic and efficiency purposes, such as

- on the basis of our legal and regulatory obligations
 - Transfer of data collected for AML/FT (*money laundering/financing of terrorism*), sanctions, embargoes and KYC;
 - Prevention, detection and combating of fraud;

- Risk management including credit and operational risks (risk rating/credit scoring etc.);
- based on our legitimate interest:
 - R&D activities (*research and development*), in particular for compliance, risk, communication and marketing purposes;
 - global and consistent overview of our customers;
 - Offering the entire range of products and services of the group so that you can benefit from them;
 - Personalization of the content of products and services and prices for the customer.

b. Exchange of information outside the BNP Paribas Group

In order to fulfill the purposes described in this privacy information, we may share your personal information with:

- Service providers who act on our behalf (e.g. IT services, logistics, printing services, telecommunications, debt collection, consulting and advisory services as well as sales and marketing)
- Independent agents, brokers or agents, bank or business partners, where such transmission is necessary to provide the Services to you or to perform our contractual obligations
- Refinancer, insurer
- local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, law enforcement agencies, governmental authorities or public bodies to which we or any member of the BNP Paribas group is obliged to disclose information, in accordance with:
 - their request;
 - Defence or reaction to a matter, claim or proceeding;
 - Compliance with the regulations or instructions of the authority applicable to us or to any member of the BNP Paribas Group;
- to members of certain regulated professions such as lawyers, notaries, rating agencies or auditors, when required in specific circumstances (litigation, audit, etc.), and to actual or proposed purchasers of the companies or businesses of the BNP Paribas group or its insurers;
- Credit agencies
- Guarantors, bailors.

We may share your personal information with business partners, such as manufacturers in sales financing programs, if and to the extent necessary to implement the financing you request.

c. Passing on aggregated or anonymised data

We share aggregated or anonymised data within and outside the BNP Paribas Group with partners such as research groups, universities or advertisers. You cannot be identified from this data.

Your data may be aggregated into anonymous statistics that can be offered to business customers to support their business development. In this case, your personal data will never be disclosed and the recipients of these anonymous statistics cannot identify you.

6. Unoccupied

7. Transfer of personal data to countries outside the EEA

If international data transfers are made to countries outside the European Economic Area (EEA) and a non-EEA country is deemed by the European Commission to provide an adequate level of data protection, your personal data will be transferred on that basis.

For transfers to non-EEA countries whose level of data protection has not been recognised by the European Commission, we may consider making an exception (for example, if the transfer is necessary to fulfil our contract with you and, for example, to make an international payment) or taking one of the following measures to ensure the protection of your personal data

- Use of standard contractual clauses approved by the European Commission
- Formulation of binding, internal company rules.

If you require a copy of these terms and conditions or information regarding their availability, you may contact us in writing (as described in section 12).

8. Is Profiling taking place?

We process some of your data automatically with the aim of evaluating certain personal aspects (profiling). We use profiling in the following cases, for example:

- Legal and regulatory requirements oblige us to combat money laundering, terrorist financing and asset-endangering crimes. In this context, we also carry out data evaluations (e.g. in payment transactions). These measures also serve to protect you.
- We use evaluation tools to provide you with targeted information and advice on products. These enable communication and advertising to be tailored to your needs, including market and opinion research.
- We use scoring to assess your creditworthiness. This involves calculating the probability with which a customer will meet his payment obligations in accordance with the contract. The calculation can include, for example, income, expenses, existing liabilities, occupation, employer, length of employment, experience from the previous business relationship, contractual repayment of previous financing as well as information from credit agencies. The scoring is based on a mathematically-statistically recognised and proven procedure. The calculated score values support us in making decisions in the context of product deals and are included in our ongoing risk management.

9. How long do we keep your personal data?

We store your personal data at least for the period of time required by applicable law. Longer retention periods are possible if required by operational needs such as proper account management, the management of our customer relationships, the fulfillment of legal requirements or compliance with governmental orders. For example, most customer data is retained for the duration of the contractual relationship and for a period of ten years beginning with the end of the year in which the contract ends. In the case of applicants without subsequent conclusion of a contract, a retention period of five years applies, starting at the end of the year in which the application is submitted.

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

According to the applicable legal provisions, you are entitled to the following rights:

- **Information:** You can request information on the processing of your personal data and a copy of this data.
- **Correction:** If you believe that your personal information is incorrect or incomplete, you may request that it be corrected.
- **Deletion:** You may request that your personal data be deleted to the extent permitted by applicable law.
- **Restriction of data processing:** You can request a restriction of the processing of your personal data.
- **Revocation of consent to data processing:** If you have consented to the processing of your personal data, you can revoke this consent at any time.
- **Data transferability:** As far as legally possible, you can demand the return of the personal data provided to us or have it transferred to a third party, if this is technically feasible.
- **Automated decisions:** If a decision to enter into or perform a Contract has only been made in an automated process and that decision has legal effect on you or is similarly materially affecting you, you may request us to conduct a further manual review after you have presented your point of view and requested the manual review. In the event of such a decision, we will also inform you separately about the reason for, and the scope and intended effects of, such data processing.

You have the right to object to the processing of your personal data in the public interest or on the basis of a balancing of interests with reference to your particular situation, including profiling based on such data. Further processing by us will then only be carried out if we can prove that the interests to be protected are predominant and worthy of protection.

You also have the unrestricted right to prohibit the processing of your personal data for direct marketing purposes and also to refuse any related profiling.

To assert these rights, please contact our data protection officer, who can be reached via the data protection inquiry at:

<https://leaseingsolutions.bnpparibas.at/datenschutz>.

In accordance with the applicable legal provisions, in addition to exercising the above rights, you have the possibility of lodging a complaint with the competent supervisory authority at the following address:

**Austrian Data Protection Authority
Barichgasse 40-42
A-1030 Vienna**

11. How can you find out about changes to this data protection notice?

Against the background of constant technical change, we may have to update the data protection information at regular intervals.

The current version is available online. We will inform you about fundamental changes on our website or via the other usual communication channels.

12. How do you reach us?

If you have any questions regarding the use of your personal data in accordance with this privacy policy, please contact our data protection officer, available via the data protection request at:

<https://leaseingsolutions.bnpparibas.at/datenschutz>.