



Privacy statement SternLease Private Lease

SternLease and privacy

Axus Nederland B.V., trading under the name **SternLease** (hereinafter: "we" or "**SternLease**") is a service provider of mobility services, among which the operational lease of vehicles. In this privacy statement we explain our practices surrounding personal data of our private lease customers (hereinafter: "you").

We respect your privacy, that is why we process your personal data in accordance with the General Data Protection Regulation (hereinafter: "GDPR"), other applicable laws and regulations in the area of data privacy and the protection of personal data and this privacy statement.

Who is the controller for the processing of your personal data?

SternLease is the controller responsible for the processing of your personal data.

Our contact information is:

SternLease

P.O. Box 703

2130 AS Hoofddorp

The Netherlands

Tel. +31(0)20 658 39 30

E-mail: privacy-nl@sternlease.nl

You can reach our Data Protection Officer via: fg-nederland@sternlease.nl.

Because of our partnership with Stern Group N.V. your personal data can be shared with Stern Group N.V. and affiliated dealers and garages. These companies are independent controllers under the GDPR.

More information on your privacy at Stern Group N.V. and their affiliated companies can be found at: www.stern.nl/1323/Privacy-statement.html.

Which personal data do we collect?

- Identification data: for example your name, address, place of residence, gender, date of birth, phone number, e-mail address and a scan of your ID and data in relation to your proof of identification and the same personal data of your partner, co-applicant or guarantor with whom you are applying. If applicable, the residence permit with a valid BSN-number [tax ID number in the Netherlands].
- Bank account number, financial data, family composition data and your, as well as your co-applicant's income information (such as salary, source of income and type of employment contract).
- Data in relation to the lease agreement: for example license plate, vehicle information, location data, maintenance and damage information, insurance data, tanking information and fines.

We always process your personal data on the basis of one or more of the following principles:

- Because we have a legitimate interest to do so, examples of which are the prevention of fraud and theft, in the context of legal proceedings and marketing and promotional activities;;
- To be able to execute and implement a (lease) agreement;
- Because you have given consent for this;
- To comply with a legal obligation.



For which purposes do we process your personal data?

1. To assess whether we can enter into a (lease) contract with you. We do this on the basis of the **SternLease** Know Your Customer (KYC) and acceptance policy. We use the services of EDR Credit Services B.V. (EDR) that performs a credit analysis for us.
 - an assessment of your creditworthiness, possibly via a partially automated process (machine learning) and review thereof by a credit analyst;
 - a financial capacity standard is determined which is equivalent to the standards for consumer credit lending, with which we can determine if you have sufficient income;
 - a check with the BKR on current and closed lines of credits (checking and registering of credit with the BKR);
 - a check on the validity of your identity document with BKR VIS;
 - a creditworthiness check in the EDR database;
 - the use of the data for the improvement of the acceptance process.EDR uses a strict privacy policy when processing personal data, which you can find here: [Privacy Statement EDR](#). Additionally, we screen our customers against international sanctions lists in accordance with our KYC policy and international legal obligations as an affiliate of a bank.
2. In the context of an agreement concluded with you, we are obliged to report the corresponding financial obligation and any payment arrears to the Bureau Krediet Registratie in Tiel (BKR [Dutch Credit Registry]). The BKR applies a strict privacy policy when processing personal data, which you can find here: [Privacy Statement BKR](#).
3. To conclude a (lease) agreement and to implement this. If we have concluded a (lease) contract with you, we can process your personal data:
 - to maintain contact with you (for example by mail, e-mail, by telephone and via our portal [My SternLease](#)) and manage our relationship with you;
 - to register a vehicle in the Dutch Traffic Registry of the "Rijksdienst voor het Wegverkeer" (RDW);
 - to have maintenance, repair and damage repair carried out on the vehicle;
 - to have the vehicle inspected, for example for the APK [Dutch annual required inspection];
 - to take out and manage insurance policies on the vehicle;
 - to provide emergency or breakdown assistance;
 - to make replacement transport available;
 - to make a fuel card from our supplier available to you and to settle the payments made with it, if applicable;
 - to take care of the payment and / or handling of fines;
 - for settling claims, for example if there is damage, an accident or theft;
 - for invoicing and payment purposes;
 - for marketing and promotional activities;
 - to send newsletters, surveys and customer satisfaction surveys to you;
 - for reporting and internal audit requirements.
4. To protect our property and interests, for example in the context of legal proceedings or in connection with measures against fraud or theft.
5. To comply with legal obligations.
6. In order to screen our customers against international sanctions lists in accordance with our KYC policy and international legal obligations as an affiliate of a bank.

Do we share your personal data with third parties?

For the implementation of a (lease) contract with you (or your employer) we can use the services of third parties. Examples include **SternLease** affiliates, car dealers, garages and insurers. In such cases we will only provide your personal data insofar as this is necessary and relevant for the services provided by the third party.



It is also possible that we provide your personal data to third parties if we are obliged to do so on the basis of the law, if we have a legitimate interest or if you have given us permission to do so. If we have asked you for permission in connection with a processing or provision to a third party, you always have the right to withdraw it.

Third parties and affiliated companies that process your personal data under our responsibility, do so only for purposes and under conditions that we have agreed with them. We record these agreements in data processing agreements. You can receive a list of categories of our service providers upon request.

Is it possible that your personal data is processed outside the EEA?

It is possible that your personal data will be processed outside the European Economic Area. If this is the case, we ensure that an adequate level of protection of your personal data is guaranteed and that the transfer only takes place in accordance with the requirements set by the GDPR. If you would like to receive more information on the possible transfer of your personal data to countries outside the EEA and which appropriate measures we have taken for such, you can contact us via fg-nederland@sternlease.nl.

How long do we keep your personal data?

We keep your personal data as long as necessary for the purpose for which we have obtained it.

- The data and documents of a rejected application are kept for a period of 4 months.
- If you are accepted as customer the documents underlying your application will be kept for a period of 5 years.
- Upon the termination of the lease agreement we will keep your personal data for a legally prescribed term, which is 7 years.

How do we protect your personal data?

We have taken appropriate technical and organizational measures to protect your personal data against loss or against any form of unlawful processing. These measures include:

- Up-to-date policies and work instructions and verification of compliance.
- Separation of tasks and roles, so that our employees only have access to your personal data if this is necessary for their function and role.
- Training our employees.
- Physical security of the locations where we process your personal data (e.g. access control and camera surveillance).
- IT security measures (e.g. secure servers, firewalls and encryption).

What rights do you have with regard to the personal data that we process from you?

The GDPR grants you the following rights:

- **Right of access and rectification.** Under Article 15 of the GDPR, you have the right to view personal data that we process about you. You also have the right to rectification if this information is incorrect or incomplete. If you have access to our portal [My SternLease](#), you can do so yourself in many cases.
- **Right of erasure.** Under Article 17 of the GDPR, you have the right under certain circumstances to have your personal data deleted when it is no longer necessary for the purposes of processing. If we have an overriding interest not to do so or if erasure is prohibited by law, we are not obliged to comply with your request.
- **Right to limit processing.** Under Article 18 of the GDPR, you have the right, under certain circumstances, to limit the processing of your personal data.
- **Right to data portability.** Under Article 20 of the GDPR, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format or to have the that data transmitted to a third party.



- **Right to object to processing.** Under Article 21 of the GDPR, you have the right to object to the processing of your personal data. If we have an overriding interest not to do so or if erasure is prohibited by law, we are not obliged to comply with your request.
- **Right not to be subject to a decision based solely on automated processing, including profiling, to which legal effects are attached.** Article 22 of the GDPR gives you the right to object to automated decision-making which has legal consequences for you. As part of our acceptance process, processing is automatically done on your data. Human intervention is, however, always possible and automatically processed personal data is checked. As a result, this processing does not fall under Article 22 of the GDPR.
- **Right to file a complaint.** Pursuant to Article 77 of the GDPR, you have the right to submit a complaint to the Dutch Data Protection Authority about the way in which we process your personal data. Of course you can always submit your complaint to us first. You can contact our data protection officer for this.

You can exercise your rights by contacting us. As soon as we have received your request, we will inform you about the further course of the procedure.

Modification of this privacy statement

We would like to point out that this privacy statement is subject to change. You can request the most recent version of this privacy statement via an e-mail to privacy-nl@sternlease.nl.

This privacy statement was last updated on 1 November, 2019.