

**TRATON FINANCIAL SERVICES IRELAND LIMITED
CUSTOMER PRIVACY NOTICE**

1. WHO WE ARE

- 1.1 'TRATON Financial Services Ireland is a company registered in the Republic of Ireland (company registration number 482137).
- 1.2 In this notice, we may use terms such as 'we', 'us' or 'our'. In each case we are, unless we state otherwise, referring to TRATON Financial Services Ireland Limited and our affiliates.
- 1.3 Our customers may be limited companies, public limited companies, limited liability partnerships or other corporate organisations.
- 1.4 You may be an employee, representative, member, shareholder, guarantor or other individual linked with our customer, or you may be a visitor to our website. We may also collect certain telematics data about you if you are an individual driving a vehicle which is financed by us. This privacy notice covers you if you fall into any one or more of these classes of individual.

2. ABOUT THIS NOTICE

- 2.1 We take the data privacy of our customers and those individuals linked with our customers very seriously and are fully committed to protecting your personal data.
- 2.2 This notice sets out the ways in which we handle your personal information, including how and why it is collected, the ways in which it is used, to whom it is disclosed, and how we ensure the security of your data.
- 2.3 This privacy notice also applies to the use of our website Scania Financial Services Ireland | Scania Ireland (Website") by both visitors and registered users.
- 2.4 At the end of this notice you will find our contact details. You can use these to contact us if you have any questions about the way your data is processed, including how to access or update your data, and how to make a complaint.
- 2.5 We may update this privacy notice from time to time and will publish the updated version on our website. Where we hold a valid email address for you, we will also notify you of any material changes by email.

3. THE LEGISLATION

- 3.1 The EU General Data Protection Regulation 679/2016 (GDPR) and the Data Protection Act 2018, amongst other laws, regulate the ways in which personal data is processed in the Republic of Ireland. For ease of reference in this notice, all relevant data privacy legislation is referred to collectively as the 'data protection legislation'.

- 3.2 In this privacy notice we refer to personal data covered by the data protection legislation either as 'personal data' or 'personal information'. This 'personal data' or 'personal information' includes any information relating to an identifiable living individual who can be directly or indirectly identified from that information. It does not apply to data held about limited companies, limited liability partnerships or any other body which is incorporated but will apply to personal information held about individuals linked with such organisations and which is processed by us.
- 3.3 A data controller (or simply 'controller') is the organisation that decides how and why your personal information is processed, collected or used. We are the controller of your personal information when it is being processed by us. This applies when you are dealing with us as a customer, or where you are linked to one or more of our customers.
- 3.4 We have not appointed a Data Protection Officer to oversee our compliance with data protection legislation as we are not required to do so, however our Head of Governance, Risk & Compliance has overall responsibility for data protection compliance in our organisation. Contact details are set out in the 'Contacting Us' section at the end of this privacy notice.

4. HOW THE LAW PROTECTS YOU

- 4.1 The data protection legislation allows us to use personal information only where we have a lawful reason to do so.
- 4.2 We recognise that business relationships are built on trust and acknowledge our responsibility to keep your personal data safe and secure at all times. We will never sell your personal data.
- 4.3 We will only process your personal data in accordance with all applicable data protection legislation and will adhere to its principles as they apply to us.

5. PERSONAL INFORMATION WE PROCESS ABOUT YOU

- 5.1 When you interact with us, in the context of a customer relationship you have with us or a customer relationship that an organisation with which you are linked has with us, you may provide us with or we may obtain personal information about you, such as information concerning your:
- 5.1.1 personal contact details such as your name, title, address, telephone number and personal or personalised email address,
 - 5.1.2 date of birth, gender and marital status;
 - 5.1.3 social security number and other tax or governmental identifiers;
 - 5.1.4 bank accounts, payments and tax status;
 - 5.1.5 contracts you have with us and information relating to those contracts including contract terms and disputes;
 - 5.1.6 identification documents and information such as passport, utility bills, identity cards and signature;

- 5.1.7 work records, which may include job titles, work history, professional memberships, education and professional records/qualifications;
 - 5.1.8 images and movements obtained through CCTV footage and information obtained through other electronic means such as photographic images, video and voice recordings;
 - 5.1.9 use of our information and communications systems, including any computers that we allow you to access, passwords, personal identification numbers, IP addresses, user names, details of your browser and operating system, the website from which you visit our website, details about any visit by you to our website or our customer facing IT systems and other IT system identifying information;
 - 5.1.10 personal history and information including hobbies, interests, family details and dietary requirements;
 - 5.1.11 advisors appointed by you including lawyers, accountants and financial advisors;
 - 5.1.12 business information including property and assets owned by you, transactions, amounts paid or owed, and accounting records;
 - 5.1.13 creditworthiness in order to establish whether to enter into or continue a business relationship with you or an organisation with which you are linked;
 - 5.1.14 communications with us, including those you send to us and receive from us, and details of any claims, letters, emails, SMS, MMS, social media communication/posts and other electronic communication (which may in some cases include audio recording of telephone conversations);
 - 5.1.15 responses to any feedback forms, surveys, competitions or promotions;
 - 5.1.16 image and movements (including video and/or photographic recordings), likeness, statements, interview transcripts and voice recordings where you have agreed to participate in a testimonial or case study;
 - 5.1.17 marketing preferences so that we know whether and how we should contact you, and to enable us to administer any subscriptions you have with us;
 - 5.1.18 attendance at events or functions; and
 - 5.1.19 telematics and other vehicle information to the extent you drive any vehicles financed by us.
- 5.2 Depending on the nature of our interactions with you, there may be certain essential personal information that we must collect from you in the context of your relationship with us. This will vary depending on the relationship we have with you.
- 5.3 We may also ask you for additional personal information which it is optional for you to provide but which will allow us to better tailor our relationship with you. For example, you may provide us with additional contact details to make it easier for us to get in touch with you, or with additional information about your dietary preferences in connection with a company event.

- 5.4 We will always aim to make it clear which personal information is essential for you to provide and which personal information is optional. However, if you are unsure as to whether you are required to provide any particular piece of personal information please ask us.
- 5.5 We do not generally collect any special category personal data about you but where it is necessary for us to process any special category data, we will process it on the basis of legal obligations or based on your explicit consent.
- 5.6 'Special category' data includes information about your race or ethnicity, religious beliefs, sexual orientation, political opinions, trade union memberships, health (including any medical condition, health and sickness records, medical records and health professional information and disability information) and biometric information, such as fingerprints or retina scans.
- 5.7 We may in limited cases process criminal records information in relation to you and if we do so we will process it on the basis of legal obligations or based on your explicit consent.
- 5.8 We may not collect all of the above types of personal data about you, and what we do collect will depend upon the nature of your relationship with us.

6. OUR BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

- 6.1 For the purposes of your relationship with us, the law states that we must have one or more of the following reasons for processing your personal information:
- 6.1.1 For the performance of a contract we have with you
 - 6.1.2 Where it is necessary for us to comply with our legal obligations
 - 6.1.3 Where it is in our legitimate interest to do so, for example where you are linked with an organisation that is our customer;
 - 6.1.4 Where you have provided consent to it.
- 6.2 A "legitimate interest" is where we have a business or commercial reason to process your personal information and it is not unfair to you for us to do so.
- 6.3 In the limited circumstances where it is necessary for us to process special category or criminal records information in relation to you, we will process it on the basis of legal obligations or based on your explicit consent.
- 6.4 For further information about how we process your personal data please see the section below entitled "How We Use Your Personal Data".
- 6.5 If you provide us with the personal data of other individuals, please share this privacy notice with them. They have the same rights as set out in this privacy notice, including a right to be informed about what personal information we hold about them, how we collect it and how we may use and share that information.

7. HOW WE COLLECT PERSONAL DATA

7.1 We may collect personal information about you, and information about your business, from other organisations within the TRATON and Volkswagen group of companies. We may also collect your personal information (depending upon your link with our customer(s)) from the following sources.

7.2 Data you provide to us:

- 7.2.1 When you apply for a finance or insurance product from us
- 7.2.2 When you notify us of a change of your personal details
- 7.2.3 When you agree to act as a personal guarantor for a finance product
- 7.2.4 When you make a claim on a TRATON insurance product
- 7.2.5 When you submit an enquiry on our website
- 7.2.6 When you make a credit or debit card payment to us
- 7.2.7 In emails, letters and other communications you send to us
- 7.2.8 In face-to-face or telephone discussions with our sales or administrative staff.

7.3 Data from third parties we work with:

- 7.3.1 An organisation with which you are linked
- 7.3.2 Service providers to us, such as IT service providers, or telematics service providers where you drive a vehicle financed by us
- 7.3.3 Independent Scania dealers
- 7.3.4 Other companies and brokers that introduce you to us
- 7.3.5 Credit Reference Agencies (“CRAs”)
- 7.3.6 Public information sources such as the Register of Electors or Companies Registration Office
- 7.3.7 Agents and introducers working on our behalf
- 7.3.8 Our advisors and representatives or your advisors and representatives
- 7.3.9 Government, law enforcement and security agencies.

7.4 We may also collect data about you from our website (detailed further below) and/or when you use our electronic services (such as e-signature).

8. OUR WEBSITE

8.1 Our Website is not aimed at children and we do not knowingly process children’s personal data.

8.2 Third party links:

- 8.2.1 Our website may include links to third party websites, plug-ins and applications. Clicking on these links or enabling these connections may allow third parties to collect or share data about you. We do not control these third party websites and are

not responsible for their privacy notices. When you leave our website, we encourage you to review the privacy notice of every website you visit.

8.3 Personal data specifically collected by the website:

8.3.1 **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.

8.3.2 **Usage Data** includes information about how you use our website, products and services.

8.3.3 **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences if indicated on our website.

8.3.4 We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

8.3.5 As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We connect this personal data by using cookies, server logs and other similar technologies.

8.4 Cookies

8.4.1 Our website uses cookies to distinguish you from other users. This helps us to provide you with a positive experience when you use our website and helps us to make improvements to our service. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies.

8.4.2 For more detailed information on how we use cookies on our website, please see the Cookies Policy, Cookies | Scania Ireland (website).

9. WHO WE SHARE YOUR PERSONAL DATA WITH

9.1 We may share your personal information with other companies within our group of companies and with other organisations such as:

9.1.1 Independent TRATON dealers

9.1.2 Broker or funding partners that we introduce you to

9.1.3 Organisations that introduce you to us

- 9.1.4 If you apply for insurance through us, our insurance partner, the insurer and any reinsurers
 - 9.1.5 Credit Reference Agencies (“CRAs”)
 - 9.1.6 Fraud prevention agencies
 - 9.1.7 Organisations that process contract signatures on our behalf, such as Adobe, Scrive or DocuSign
 - 9.1.8 Organisations that process payments on our behalf, such as under the Direct Debit scheme
 - 9.1.9 The Revenue Commissioners, regulators and other authorities with whom we are under a legal obligation to share or are permitted to share your personal data
 - 9.1.10 Vehicle repossession agents
 - 9.1.11 Service providers to our business, such as IT service providers or telematics service providers
 - 9.1.12 Our website hosting provider and providers of website support
 - 9.1.13 Our advisors and representatives or your advisors and representatives
 - 9.1.14 Investors and their advisors for corporate finance purposes, for example in the event that we sell or buy any business or assets, or if we or substantially all of our assets are acquired by a third party
 - 9.1.15 Purchasers of our business: buyers or prospective buyers to whom we sell or negotiate to sell our business or a part thereof
 - 9.1.16 Third parties that have or acquire an interest in the products or services we provide to you
 - 9.1.17 Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security
 - 9.1.18 Organisations you ask us to share your personal data with.
- 9.2 Where we share your data with third parties, we will take appropriate steps with the aim of ensuring that your rights continue to be protected. We will only provide personal information that is necessary and for specific purposes. We have agreements in place with any third parties that process personal data on our behalf that require them to safeguard your personal data and comply with our data privacy principles as given within this privacy notice. Please note that some third parties will have a direct relationship with you.
- 9.3 We may transfer your personal information to a third party, as part of a sale of some or all of our business and assets, or as part of a business restructuring or reorganisation. We may also transfer your personal information to legal or regulatory authorities where we are under a legal duty to do so or where we are permitted to do so.

10. HOW WE USE YOUR PERSONAL DATA

10.1 The purpose of our processing of personal data is primarily the management and administration of our customer contracts, to fulfil and enforce our customer contracts, to manage our relationship with our customers and to meet our legal and regulatory obligations. We may also carry out marketing activities.

10.2 For the performance of a contract we have with you:

We may use your personal data to fulfil, apply or enforce the terms of a contract we have with you, or in order to take steps to prepare the terms and documentation before entering into such a contract, including for the following purposes:

- 10.2.1 to provide you with a finance or insurance quote, either directly or via a truck salesperson located within a dealership
- 10.2.2 to prepare a credit or insurance application proposal on your behalf
- 10.2.3 to prepare your contract and set up your finance agreement or insurance policy on our systems
- 10.2.4 to facilitate, where applicable, the electronic signing of your finance agreement or other necessary documentation
- 10.2.5 to register your business as a customer on our loan and leasing system and/or our insurance policy management system
- 10.2.6 to maintain and administer your finance agreement or insurance policy and to manage our relationship with you
- 10.2.7 to keep you informed about your finance agreement or insurance policy, such as to remind you about its upcoming expiry
- 10.2.8 to exercise our rights under contracts you have with us, such as to repossess vehicles financed by us, or to chase arrears and bad debts where payments, rentals or finance repayments are not made in full and on time.

10.3 Where it is in our legitimate interest:

We may process your personal data where it is necessary for us to pursue our legitimate business interests, such as for the following purposes:

- 10.3.1 to enter into, perform and manage a customer relationship with an organisation with which you are linked
- 10.3.2 to consider an applicant's eligibility for finance (please also see the section entitled "Credit Reference Agencies", given later in this notice)
- 10.3.3 to maintain and keep up-to-date our customer and contacts database
- 10.3.4 to chase arrears and bad debts and, in the event that a business is no longer able to keep up lease payments or finance repayments, to recover our assets
- 10.3.5 to collect insurance premiums where you have arranged insurance cover through us and where we have been authorised as an agent to collect insurance premiums on the insurer's behalf

- 10.3.6 to protect our legal rights and to bring or defend legal proceedings
 - 10.3.7 to maintain a register of personal guarantors in the event of default
 - 10.3.8 to enable third parties that have or acquire an interest in the products or services we provide to you appropriately manage that interest and meet their legal and regulatory obligations
 - 10.3.9 to conduct customer satisfaction surveys and other market research to ensure that our service is of the standard you would expect
 - 10.3.10 to correspond and communicate with you as a customer
 - 10.3.11 for administrative purposes such as to handle queries or complaints
 - 10.3.12 to comply with your requests, such as to maintain our “unsubscribe” and “do not contact” databases
 - 10.3.13 for customer analysis to inform our marketing strategy
 - 10.3.14 to keep you informed about TRATON news and to contact you about finance, insurance and other products that we believe may be of interest to your business based on products you already receive from TRATON and Volkswagen group (other than where we rely on your consent)
 - 10.3.15 for the prevention of fraud and other criminal activity
 - 10.3.16 for information security purposes: for us to take steps to ensure the adequate protection of your personal information
 - 10.3.17 to prepare reports and customer analysis for internal and TRATON and Volkswagen group reporting purposes
 - 10.3.18 to make improvements to the operation or efficiency of our databases and systems, such as by combining and consolidating customer or other records
- 10.4 We will process your personal data where it is necessary for us to comply with our legal duty, such as:
- 10.4.1 to maintain accounting and other records as required by tax and accounting legislation
 - 10.4.2 to ensure we hold accurate and up-to-date information about you and your business
 - 10.4.3 to confirm your identity when you contact us
 - 10.4.4 to assist legal and regulatory authorities such as the police, DVLA, HMRC or other investigative or criminal investigation body
 - 10.4.5 to comply with our duties under anti-money laundering and terrorist financing legislation
 - 10.4.6 to comply with other obligations as required by any applicable law or regulation.
- 10.5 We may also process your personal data where you have consented for us to do so for the following purposes:

- 10.5.1 to make initial contact with you where you have made an enquiry or requested a call back
 - 10.5.2 to supply brochures, information leaflets and other material that you have specifically requested from us
 - 10.5.3 to share your details with third parties where you have specifically requested for us to do so
 - 10.5.4 to keep you informed about TRATON news and to contact you about finance, insurance and other products that we believe could be of interest to your business based on products you already receive from TRATON and Volkswagen group (please also see the section entitled "Marketing", given later in this notice).
- 10.6 Where we rely on your consent to process your personal data, you are entitled at any time to withdraw your consent to us processing your personal data in these ways. Please see the section below entitled "How to Withdraw Your Consent" for further details.
- 10.7 We may also record or hold personal data about you even where we have refused to enter into an agreement or contractual relationship with you or an organisation with which you are linked. This will be in order to inform you, or the organisation with which you are linked, of our decision, to document the rejection in the event that we are, at some later time, required to justify this decision, and for record keeping purposes.

11. AUTOMATED DECISIONS

- 11.1 We may use credit scoring or some other automated decision-making tool as part of the assessment of a customer's eligibility for a finance product and ability to pay. We may also use such tools to assess the ability of a guarantor to meet any liability under their guarantee.
- 11.2 Where such systems are used, the outcome of any credit scoring or automated decision-making tool will be reviewed by an underwriter such that no credit decision will be made solely on the basis of an automated process.

12. CREDIT REFERENCE AGENCIES

- 12.1 When you, or an organisation with which you are linked, apply for products or services from us, we may search your records at one or more credit reference agencies ("CRAs"), which may include both identity and credit checks. Where the applicant is a company or other corporate entity (as opposed to where you are applying for products or services yourself as a sole trader or a partner in a partnership) then this section about CRAs will only apply where you are a director, key shareholder or beneficial owner, a member or a proposed guarantor for that organisation.
- 12.2 We will use this data to:
 - 12.2.1 Assess the creditworthiness of an application and the customer's ability to afford rentals, repayments or other payments to us
 - 12.2.2 Verify the accuracy of the data you or your organisation have provided to us

- 12.2.3 Help fulfil our obligations under anti-money laundering and counter-terrorism financing legislation
 - 12.2.4 Help detect and prevent financial crime
 - 12.2.5 Where you have applied to act as a personal guarantor, assess your financial suitability to act as a guarantor.
- 12.3 When we search the CRAs for information about you or the organisation with which you are linked, the CRAs will note this credit search on the relevant credit file. Other lenders may be able to see this and we may see credit searches from other lenders.
- 12.4 We will also share your personal information with CRAs as part of our reciprocal data sharing arrangements. The data we exchange may include:
- 12.4.1 Name, address and date of birth
 - 12.4.2 Details of the relevant credit application
 - 12.4.3 Financial situation and financial and repayment history
 - 12.4.4 Public information, including from sources such as the electoral register and Companies House.
- 12.5 In the Republic of Ireland, we search your records using Vision-Net. For further information about how Vision-Net processes your personal data and your rights as an individual under the data protection legislation, please visit the privacy pages of the Vision-Net website at www.vision-net.ie/privacy.jsp
- 12.6 Where you are, or have been, a resident of the United Kingdom, we may search your records using Experian or Equifax, UK-based CRAs. Further detail about Experian and Equifax, and their role as a fraud prevention agencies, the data they holds, the ways in which they use and share personal information, their data retention periods and your data protection rights are explained in more detail on the Credit Reference Agency Information Notice or "CRAIN". This is accessible at www.experian.co.uk/crain or www.equifax.co.uk/crain/
- 12.7 Where any credit application is a joint one, or where you have disclosed that you have a spouse, partner or civil partner, or that you are in business with other partners or directors, we may link your records together. You should therefore share and discuss this information with them before making an application. The CRAs will also link your records together and they will remain linked until one of you successfully files for disassociation with the CRAs to break that link. Ordinarily, you will need to provide proof that you no longer have a financial link with each other.

13. FRAUD PREVENTION & ANTI-MONEY LAUNDERING

- 13.1 We will process personal data in order to fulfil our investigation and reporting obligations regarding suspicious transactions under, amongst other legislation, the Money Laundering, Terrorist Financing and Transfer of Funds (Information on Payer) Regulations 2017 and the Proceeds of Crime Act 2002. We are required to report transactions to the Garda National Economic Crime Bureau's Financial Intelligence Unit ("FIU") where there is a suspicion that such transactions represent money laundering, terrorist financing or other proceeds of crime.

14. TRANSFER OF YOUR DATA OUTSIDE THE EEA

- 14.1 Your personal data and any special category personal data is stored electronically on our secure servers and those of TRATON and Volkswagen group companies, all of which are located within the European Economic Area ('EEA').
- 14.2 Your personal data and special category personal data may also be stored in hard copy form at our premises or in secure external storage.
- 14.3 We will only ever transfer your data outside the EEA to:
- 14.3.1 Follow your instructions
 - 14.3.2 Comply with a legal duty
 - 14.3.3 Provide you with services you are using or accessing whilst you are situated outside the EEA
 - 14.3.4 Provide information to our agents, advisors and/or fellow TRATON and Volkswagen group companies who we use to help administer your account or the account of an organisation with which you are linked.
- 14.4 Where we do transfer information outside the EEA, we will take appropriate steps with the aim of ensuring that it is protected in the same way as if it was processed within the EEA. To that end, we will ensure one or more of the following safeguards:
- 14.4.1 Transfer it to a country outside the EEA but which has privacy laws that give the same or a comparable level of protection as those within the EEA
 - 14.4.2 Put in place appropriate safeguards, including but not limited to entering into Standard Contractual Clauses ("SCCs") with the recipient of the data.
 - 14.4.3 Transfer it to organisations that are part of the Privacy Shield. The Privacy Shield is a framework which sets privacy standards for data transfers between the United States and the countries of the European Union ('EU') and ensures shared standards which are similar to those applicable within the EEA.
- 14.5 More information about the adequate protection of data transfers outside the EU/EEA can be found on the European Commission website at https://ec.europa.eu/info/law/law-topic/data-protection_en.
- 14.6 Our directors, employees and other individuals working for us may in limited circumstances access personal information from outside the EEA if they are physically located outside the EEA at the time of access. If they do so, such access will be subject to our security measures and under contractual or other arrangements with us which are subject to Irish Law and afford the same legal protections that would apply to accessing personal data from within Ireland.
- 14.7 If you have any questions about transfers of personal data, please contact us using the details provided in the Contacting Us section of this privacy notice.

15. IF YOU CHOOSE NOT TO PROVIDE YOUR PERSONAL DATA

- 15.1 We may need to collect personal information in order to comply with the law, or under the terms of a contract we have with you or an organisation with which you are linked.
- 15.2 If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations or from arranging and administering the relevant contract(s). This could mean that we refuse or cancel a product or service you or the organisation with which you are linked have with us.
- 15.3 Any data collection that is optional will be made clear to you at the point of collection or application.

16. MARKETING

- 16.1 We may use the details we hold about you and your business, including personal information such as your name, address and contact details, to provide company updates and newsletters from TRATON Financial Services, TRATON and Volkswagen group of companies, to conduct customer satisfaction surveys or to contact you about products and services related to those you currently receive from TRATON or Volkswagen group of companies, or have used in the past. These communications may include information about:
 - 16.1.1 Finance, insurance and other similar services offered by us
 - 16.1.2 Special offers, campaigns and incentives
 - 16.1.3 Bundled vehicle and service packages supplied by TRATON and Volkswagen group of companies.
- 16.2 Where we rely on your consent to provide marketing communications to you, we may, from time to time, ask you to refresh your marketing preferences and confirm that you consent to receive future marketing communications from us.
- 16.3 Where we rely on your consent, you may withdraw your consent at any time. Details can be found in the section below entitled "How to Withdraw Your Consent". You may also use the 'Unsubscribe' button at the bottom of our messages to opt out of future direct marketing from us.

17. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

- 17.1 Whilst no system is completely secure, we, TRATON and Volkswagen group companies, have technical and organisational security arrangements in place to protect your personal information against unauthorised access, improper use, alteration, destruction or accidental loss.
- 17.2 Personal data held and processed by us may be stored in manual or electronic filing systems.
- 17.3 We seek to continually improve our security measures in line with technological advancements.

18. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

- 18.1 We will retain your personal data for as long as you or the customer with which you are linked remain our customer.
- 18.2 At the point our business relationship with you or the customer with which you are linked ends, we may keep your data for a period of up to 7 years for one or more of the following purposes:
- 18.2.1 To respond to any queries or complaints
 - 18.2.2 To demonstrate that we treated you fairly and in compliance with the law
 - 18.2.3 To pursue or defend legal claims
 - 18.2.4 To maintain records according to rules that apply to us.
- 18.3 We may keep your data for longer than 7 years where this is required for legal or regulatory reasons.
- 18.4 We may also keep your data for the purposes of statistical analysis. Where we do so, we will ensure that your privacy is protected and that your data is used strictly for these purposes only. We will not keep your personal information in an identifiable format for longer than is necessary.

19. YOUR RIGHTS

- 19.1 You have certain rights as a data subject under the data protection legislation, including the right:
- 19.1.1 to be informed about how your personal information is being used;
 - 19.1.2 to access the personal information we hold about you;
 - 19.1.3 to have your personal data corrected where it is inaccurate or out of date;
 - 19.1.4 to be 'forgotten', i.e. to have your personal data erased in certain circumstances and where it is no longer required and where we no longer have a lawful reason for holding your information;
 - 19.1.5 to request that your personal data be transferred to another 'controller' (person or organisation) in certain circumstances;
 - 19.1.6 to request that the processing of your personal data be restricted, for example where you believe it is unlawful for us to process it, you believe the information we hold is inaccurate, you have objected to its use and our investigation is pending, or we no longer require your information but you require us to keep it for legal reasons;
 - 19.1.7 to object to the processing of your personal data in certain circumstances, particularly where we rely on 'legitimate business interest' as a lawful basis for the processing of your data;
 - 19.1.8 to object to certain automated decision-making processes using your personal information;
 - 19.1.9 to withdraw consent to processing where we rely on this as the only lawful basis for processing. If you withdraw your consent, our use of your personal data before your withdrawal remains lawful; and

- 19.1.10 to complain to a supervisory body. Please see the section entitled Complaints and Contacting the Regulator below.
- 19.2 You should note that some of these rights, for example the right to require us to transfer your data to another controller or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which may not apply to personal information recorded and stored by us.
- 19.3 Other rights, however, are absolute rights and have no conditions attached, such as your right to withdraw consent or to object to processing for the purposes of direct marketing.
- 19.4 The way we process your personal data and the legal basis upon which we rely to process it may affect the extent to which these rights apply. If we choose not to action any request from you, we will explain the reasons for our refusal.
- 19.5 We may request evidence of your identity before processing any request. This is to ensure the security of your personal information.
- 19.6 If you would like to exercise any of these rights, please contact us using the contact details provided in the Contacting Us section at the end of this privacy notice.

20. HOW TO WITHDRAW YOUR CONSENT

- 20.1 Where we rely on your consent to process your personal data, you may withdraw your consent at any time. We may nevertheless continue to process your personal data if we have other lawful reasons to do so.
- 20.2 Please be aware that, if you withdraw your consent, we may not be able to provide our products and services to you or the organisation with which you are linked.
- 20.3 If you wish to withdraw your consent, please contact us using the contact details provided in the Contacting Us section at the end of this privacy notice. Withdrawal of your consent does not affect the lawfulness of our use of your personal data before you withdrew your consent.
- 20.4 If you wish to withdraw your consent to any direct marketing to which you have previously opted in, you may also use the 'Update My Marketing Preferences' or 'Unsubscribe' options contained in our emails and other marketing messages.

21. COMPLAINTS AND CONTACTING THE REGULATOR

- 21.1 If you are unhappy with the way we are using your personal information you can make a complaint to the Data Protection Commission or your local data protection regulator.
- 21.2 However, we are here to help and would strongly encourage you to first contact us directly in the event of any query or complaint and we will do all we can to resolve any issues you may raise. Please see the contact details provided in the Contacting Us section at the end of this privacy notice.

21.3 If you feel that your information has not been handled correctly or you are unhappy with our response to your request(s) and you wish to make a complaint to the Data Protection Commission, they can be contacted by visiting www.dataprotection.ie.

22. CONTACTING US

22.1 For any questions regarding data protection at TRATON Financial Services Ireland Limited or to exercise your data protection rights, please contact us using the details provided below:

By email dataprotection.ire@tratonfs.com

By post Data Protection, TRATON Financial Services Ireland Limited, 2 Shelbourne Buildings, Crampton Avenue, Shelbourne Road, Ballsbridge, Dublin 4, D04 W3V6