

## Privacy Statement

### **Pursuant to Article 13 of Regulation 679/2016 (EU) concerning consent for data processing**

#### **Presentation of our values**

Athlon Car Lease (hereafter referred to as "Athlon") is one of the main providers in Europe of long-term leasing and corporate fleet management services. Athlon has developed innovative sustainable and financially advantageous mobility solutions. Our mission is to provide the best leasing and mobility solutions in order to satisfy the continuously evolving needs of our clients. Athlon – a company within the Daimler Group – is headquartered in the Netherlands and has a presence in many other countries. A full overview is available on the Athlon website:

[www.athlon.com/it](http://www.athlon.com/it)

Athlon takes clients' interest in its services very seriously. Athlon collects and processes the personal data of clients in accordance with this Statement, with Daimler's Statement and with legislation currently in effect on data protection.

Please read this Statement carefully in order to understand how Athlon collects and uses the personal data of its clients.

#### **Data controller**

The legal person tasked with client personal data processing is **Athlon Car Lease Italy S.r.l. Via Carlo Veneziani n°56 – 00148 Rome, Italy.**

For some specific processing of personal data, there may be a situation of joint controllership with the Athlon's Headquarter.

For this reason, a joint controllership agreement was concluded with the Athlon's Headquarter in order to identify the respective legal obligations. However, the customer as data subject can assert his rights indicated hereafter towards each data controller.

In specific cases, the joint personal data controller is Daimler AG Chief Officer Corporate Data Protection HPC G353 – 70546, Stuttgart, Germany; e-mail: [data.protection@daimler.com](mailto:data.protection@daimler.com), for the management of joint processing.

For all information on personal data processing, please contact Athlon using the contact details set out above or by writing to [protezione.dati@athlon.com](mailto:protezione.dati@athlon.com).

#### **Collection and use of personal data**

This Statement sets out the ways in which Athlon collects personal data and the purposes for which it is used.

For security reasons, and in particular to prevent and detect attacks to our website or attempted fraud, the IP addresses

<sup>1</sup>Such data, within the limits of the requirements of the Guarantor, belongs to the following categories:

(a) identification, biographical and socio-demographic data: tax code, VAT number, contact details, identity documents, health card, IBAN code, data relating to occupation/profession, income, gender, age, etc.

residence/domicile, marital status, household);

and names of internet service providers are also retained for seven days.

Personal data may be obtained directly from the client; for example, if it uses a leased vehicle or if it visits the Athlon website. Personal data may also be acquired using indirect means. For clients using leased vehicles, Athlon may receive information from the employer, such as contact details. If the client has contact with one of Athlon's partners, information may also be received from them; for example, concerning the provision of maintenance services for the leased vehicle.

Set out below is an overview of the **specific services** (in the category referred to previously) for which Athlon processes personal data:

<b>Athlon Solutions</b>	<b>Mobility Services</b>	<b>Fleet Management</b>
Full-Service Lease	Sustainable Mobility	EasyAthlon
Matrix	Flex Relief	Athlonline
Lease Back	Rent&Roll	Fleet Management
	BikeLease	Fuel Card
	FlexDrive	

For each of the **servicecategories** specified below, information is provided concerning the purpose of processing, on the personal data generated for each of these purposes, and with whom the personal data is shared.

#### **How we use your data**

This information notice, according to articles 13 and 14 of EU Regulation 679/2016, is also made on behalf of credit information systems.

As the data controller, we would like to inform you that in order to respond to your request, we use certain data about you. This is information that you provide to us or that we obtain by consulting certain databases.

These databases (Credit Information System or SIC) containing information about the interested parties are consulted to assess, assume, or manage credit risk and to evaluate the reliability and punctuality of the payments of the interested party, and are managed by private parties belonging to the categories that you will find in the information provided by the managers of the SIC.

This information will be stored with us and at MBM (Mercedes Benz Mobility AG, Siemensstraße 7, 70469 Stuttgart – Germany, e-mail: [mobility@daimler.com](mailto:mobility@daimler.com)) based on the following processing activities, including automated processing, credit risk analysis and assessment and for the following purposes of prevention of over-indebtedness, protection, and recovery of credits; some of the information that you provide us with, together with information originating from your payment behavior concerning the relationship that is going to be established, may be communicated periodically to SCI<sup>1</sup>.

b) data relating to the request/report, describing the type of contract, the amount, reimbursement/payment method, and the contract's request or execution status;

c) accounting data relating to payments, periodic trends, debt exposure, including residual debt, and summarizing the relationship's accounting status;

This means that the persons in the above categories to whom you make the request for the establishment of a relationship will be able to know whether you have submitted a request to us and whether you pay regularly.

The processing and communication of your data is a requirement for the conclusion of the contract. Without this information, we may not be able to respond to your request. The storage of this information in the databases takes place based on the data controller's legitimate interest to consult the SCI.

### **Processing carried out by our Company**

We will not transfer your data to a third country outside the EU or to an international organization.

According to the terms, methods, and within the limits of applicability established by the regulations in force, you have the right to know your data and to exercise the various rights relating to its use (rectification, updating, cancellation, restriction of processing, opposition, etc.).

You may lodge a complaint with the Personal Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)), as well as resort to other means of protection provided by the applicable legislation.

We keep your data at our Company for the time necessary to manage your contractual relationship and to comply with legal obligations (for example, as provided for in Article 2220 of the Civil Code regarding the storage of accounting records).

For any request concerning your data, you can contact the references in the "Data Controller" section of this document or write an e-mail to the following address: [protezione.dati@athlon.com](mailto:protezione.dati@athlon.com) and/or the companies listed below to whom we will disclose your information.

Your data may be used in an application's automated decision-making process if such a decision is necessary to conclude or execute your contract with us. Athlon Car Lease Italy S.r.l. adopts an automated credit scoring system based on the application of statistical methods or models to assess credit risk, the results of which are expressed in the form of synthetic judgments, scores associated with the Client, aimed at providing a representation, in predictive or probabilistic terms, of his or her risk profile, reliability or punctuality of payments. Pursuant to Article 22, section 3 of EU Regulation 679/2016, the Client still has the right to obtain human intervention by Athlon Car Lease Italy S.r.l. to express his opinion and challenge the decision.

Your data may also be used to **prevent over-indebtedness, protect and recover credits**, using electronic processing, consultation, comparison with pre-established criteria, and conduct any other appropriate operation relating to the achievement of the purposes described above, **also using the transmission and communication of data to third parties charged with carrying out or providing specific services – strictly functional to the execution of the contractual relationship – such as banks, companies that carry out payment services, insurance companies, factoring and**

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d) data relating to recovery or litigation activities, to the assignment of credit or exceptional events affecting the subjective or patrimonial situation of companies, legal persons, or other entities.

**debt collection companies, companies that provide commercial information; these subjects, in turn, may communicate them to their business partners, members, users, assignees within their respective institutional purposes, all in full compliance with the provisions of the law on data protection and data security.**

We would also like to inform you that you can contact our Data Protection Officer at the following address if you have any questions: [protezione.dati@athlon.com](mailto:protezione.dati@athlon.com) and/or the companies listed below to whom we will disclose your information.

### **Processing carried out by the SCI Manager**

To better assess the credit risk, as well as the reliability and punctuality of payments, we communicate certain data (personal data, also of the person possibly co-obligated, type of contract, amount of credit, repayment methods) to the Credit Information System systems, which are regulated by the relevant Code of Conduct (Code of Conduct for information systems operated by private entities on consumer credit, reliability, and punctuality of payments – Provision of September 12, 2019) and which hold the status of the autonomous data controller. The data is also made accessible to the various private subjects belonging to the categories you will find in the SIC managers' information, available through the channels listed below.

The data concerning you is periodically updated with information acquired during the relationship (payment trends, residual debt, and the relationship).

Within the scope of the SIC, your data will be treated under the methods of organization, comparison, and elaboration strictly necessary for the pursuit of the purposes described above, and it will be elaborated using computer, telematic and manual instruments that guarantee the security and confidentiality of the credit information treated. The data contained in the EURISC SIC is also processed by automated credit scoring decision-making or processing using various types of factors (including, but not limited to, the following: The number and characteristics of existing credit relationships, the trend and payment history of existing or extinguished relationships, the presence and characteristics of new credit applications, the history of extinguished credit relationships, etc.) to give you a summary judgment or score on your level of reliability and solvency.

Some additional information may be provided to you if your request is not granted.

The SCIs we adhere to are:

#### **CRIF S.p.A**

Bologna, via M. Fantinn. 1-3

Public Relations Office, via Zanardi 41, 40131 - Bologna

(fax: 051/6458940 - tel.: 051/6458900, website:

[www.consumatori.crif.com](http://www.consumatori.crif.com))

SYSTEM TYPE: positive and negative

DATA RETENTION TIMES: these times are indicated in the table below

USE OF AUTOMATED CREDIT SCORING SYSTEMS: yes  
 EXISTENCE OF AN AUTOMATED DECISION-MAKING PROCESS: no

You have the right to access your data at any time. Please contact our Company at the references in the "Data Controller" section of this document, or you can write an e-mail to the following address: [protezione.dati@athlon.com](mailto:protezione.dati@athlon.com), or you may contact the SIC managers at the addresses indicated above.

In the same way, you can request the correction, updating, or integration of inexact or incomplete data, or the cancellation or blocking of data processed in violation of the law, or oppose its use for legitimate reasons to be highlighted in the request (Articles 15 to 22 of the EU Regulation excluding art. 20).

**Data retention times in the SCI:**

<b>Personal data related to requests, communicated by participants</b>	For the time necessary for the investigation, but in any case, no later than <b>180 days</b> from the date of submission of the requests.
<b>Personal data relating to the request waived or not granted by the data subject</b>	The report of the request will be deleted no later than <b>90 days</b> from the date of the last update made at the beginning of the month following the request itself.
<b>Negative information relating to payment delays subsequently settled</b>	<b>Twelve months</b> from the date of recording data relating to the regularization of late payments not exceeding two installments or months.
	<b>Twenty-four months</b> from the date of regularization of overdue payments of more than two installments or months. Once the time limits have expired, the data is deleted unless data relating to further delays or defaults is recorded in the meantime.
<b>Data relating to the regularization of defaults occurring after the credit has been assigned to a party not participating in the scheme</b>	Without delay, provided that the participant has known of it.
<b>Negative credit information relating to defaults that have not subsequently been settled</b>	No later than <b>36 months</b> from the contractual expiry date from the date on which it was necessary to update the data, in any case, maximum up to <b>60 months</b> from the date of expiry of the report, in the event of other events relevant to payment.
<b>Positive credit information relating to a relationship that has ended with the extinguishment of all monetary obligations</b>	No later than <b>60 months</b> from the date of termination or expiration of the contract or from the first update made in the month following those dates.
	<b>Further storage</b> in the system if the system contains, concerning other credit relationships relating to the same person, negative credit information concerning unregulated delays or defaults.
<b>First delay data is used and made accessible to other participants</b>	After <b>60 days have elapsed</b> :  (a) by the monthly update  (b) in the event of failure to pay at least two consecutive monthly installments  (c) when the delay relates to one of the last two payment due dates. Data is made accessible after the monthly update related to the second consecutive unpaid installment.

**Long-term B2B leasing**

For the supply of leasing services, a contract is concluded with the client, company or private individual. Should you wish to activate a leasing service, Athlon will acquire and process the following personal information: name, address, city of residence, phone number and e-mail address, so as to be able to contact the user and to generate a quote and an offer for a leased vehicle. When a vehicle is leased from

Athlon, the data pertaining to that vehicle (such as the license plate, model, fuel type and fiscal horsepower).

In order to execute the above, the following will be processed: name, address, city of residence, e-mail address (work), phone number, type of lease, vehicle model, schedule of assistance provided and contact persons. Moreover, information may be generated on vehicle management or any other personal data provided either through the use of the Athlon platform or through calls made to the call center, or through black-box-type devices, for data concerning vehicle movement (locations, speed, distance), locations and times at which the engine is turned on and off, location and geolocation. The processing of client personal data is necessary for management of the lease contract and services, including insurance services. It is in Athlon's interest to provide the client with the highest possible quality of service. Information is shared with the client company and/or the driver of the vehicle.

Athlon may be contacted in various ways, such as by e-mail, phone and via the website. In this case, personal data will be used to deal with queries or requests. To this end, the following may be processed: name, contact information, correspondence with Athlon concerning queries or requests and any other personal data provided that is needed in order to respond appropriately.

**Long-term B2C leasing**

Athlon also offers private leasing services.

In the event of a request for information about Athlon's services concerning private leasing, a contact form is available on the website, which you can use by entering your name and other required information.

This personal data is used only to respond to the request submitted.

Quotes may be obtained through the Athlon website. Prior acceptance as a private leasing client, personal data will be collected.

To obtain a quote or preliminary agreement, the following will be collected: name, address, city of residence, phone number, e-mail address and date of birth.

Should you wish to activate a leasing service, Athlon will acquire and process the following personal information. For the contract to be accepted, some additional personal data needs to be obtained, such as a copy of your ID, health insurance card, copy of your payslip, tax return, bank details (IBAN) and any other relevant information required to assess your credit score.

Athlon has outsourced client credit scoring to an external partner and does not track information from this phase. The agreements entered into by Athlon with external partners ensure that privacy is safeguarded and that data is processed in accordance with current legislation.

Before the contract is accepted, a check will be conducted on the client's financial circumstances through the relevant databases.

Following the positive outcome of the preliminary investigation of the Credit Department, the contract will be

signed and the order for the vehicle finalized. During this phase, the personal data required pertains to the ordering and delivery of the vehicle (phone number, e-mail address, delivery address). Data pertaining to the vehicle itself (license plate, model, fuel type and fiscal horsepower) is also processed. The processing of client data is necessary for execution and management of the contract.

Personal data is also shared with third-party companies with which specific agreements are in place for the management of online payments, the payment of deposits and the periodic payment of lease installments. To this end, only the information needed in order to execute the payment is shared.

Athlon may be contacted by e-mail, by phone and via the website. In this case, personal data will be processed to respond to questions or requests received. For such purposes, usage is made of data such as name, contractual information, communication exchanges and any other information that Athlon may receive and for which there is a need to make an appropriate response. Athlon may also contact the client in relation to a private leasing contract.

### ***Mobility services***

Athlon provides the following additional services. The processing of client data is necessary for management of each of the services provided for in the contract. It is in Athlon's interest to provide the client with the highest possible quality of service.

### ***Maintenance, repairs and tires***

Safety is fundamental. Therefore, regular maintenance, repair and tire service interventions need to be conducted for the vehicle used. In order to manage vehicle maintenance services, Athlon processes the following data: name, address, phone number, e-mail address, lease type, license plate, vehicle type and model and the schedule of services provided to the vehicle. Furthermore, for operational management of the vehicle, processing includes the cell phone number of the contact person; for example, to schedule an appointment for maintenance services.

The services set out above are not provided directly by Athlon, which makes use of external partners such as dealerships, garages and tire service centers. Personal data processing also involves data sharing with such partners/suppliers. Clients may also occasionally contact our partners/service providers. In this case, clients will provide their own personal data directly to service partners, who will then inform Athlon of the type of intervention performed, the corresponding cost, mileage, client name and vehicle license plate.

Vehicle maintenance information is also shared with the driver, and with the client company.

### ***Roadside assistance***

In the event of problems with the vehicle caused by road accidents, mechanical breakdowns etc., Athlon is able to provide a roadside assistance service, using its own partner

to intervene in the event of a need for towing or for a replacement vehicle.

For such purposes, the following personal data will be collected: name, e-mail address, phone number, license plate number and the location at which assistance is requested and provided.

The personal data will be shared with external roadside assistance providers.

### ***Accident management***

An accident may be caused either by the driver of the vehicle or by a third party. In such cases, the damage may need to be dealt with and repaired and a replacement vehicle organized to restore mobility. In the event of damage to the vehicle used or of an accident, the driver can send a notification to Athlon's Driver Desk. In such cases, the following personal data will be collected:

- name, contact information, license plate number, service schedule, vehicle particulars, incident details (including photos), information on the type and scale of the damage, information on any other passengers and statements and any other relevant information that may be provided concerning the context of the incident;
- information arising from any third parties also involved in the incident, such as name, name of insurance company, insurance policy number and any third party claims;
- information collected from vehicle location devices, such as place and vehicle speed, geographic coordinates, vehicle mileage;
- relevant information collected from insurance companies;
- where available: statements and/or reports generated by the authorities (police, law enforcement etc.).

Relevant information may be shared with the insurance companies involved, either forming part of the Daimler/Athlon Group or third party companies.

In some cases, Athlon will appoint a third-party company to determine the damage. In such cases, the information and data in Athlon's possession may be shared with such companies for loss adjustment.

The damage report created by the company that conducted the expert assessment will be shared with Athlon, who may appoint a third-party company and/or other professional for a more in-depth examination of damage assessment or for the settlement of any claims. Reports issued by such professionals will also be shared with Athlon.

In the case of long-term leasing, the information and personal data relevant for management of a claim will be shared with the company to which the driver belongs or the person concerned.

### ***Fine management***

As a rule, fines issued by the relevant authorities against the drivers of leased vehicles will be sent to Athlon, as the vehicle owner.

Athlon will settle such fines in a timely manner and based on the information contained in the management system and

will debit the amount from the client company or directly from the driver.

Personal data processing will be finalized on payment of the fine, and where applicable, when reimbursed by the company. We also process the following data, which is passed on by the competent authority: name, address, license plate number, type and location and time of the infraction and the fine levied.

In the case of vehicles used in a car pool or through car-sharing, where it is not possible for Athlon to determine the identity of the driver of the vehicle, the personal data set out above may be shared with the relevant departments of the company in question.

Rules governing the management of fines may differ from country to country. In some cases, Athlon is required to pass on driver data to the competent authority, which will directly approach the driver for subsequent management of the infraction.

#### Fuel card

Athlon services also include the fuel card scheme, which enables fuel to be paid for at a gas station. For issuance and management of the fuel card, Athlon collects and processes the following data: name, address, e-mail, date of birth, fuel card number, license plate of vehicle used, fuel type, mileage and associated costs.

Fuel cards are provided by a third-party company with which Athlon shares the client's/driver's name, address and date of birth.

#### Online portal and app

Athlon may make use of the online portal or app, namely Milo, available to the drivers of leased vehicles where information on the leased vehicle, contact information and other personal data is easily accessible. Additional functionality may be added to signal vehicle damage and schedule appointments for maintenance, repair or tire changes. It is possible to add additional functionality to signal changes or damage to the vehicle, and to schedule and manage appointments for maintenance, repair or tire changes online, contact the Driver Desk, and pay fines and fuel costs.

The name and e-mail address of the individual using the portal and/or the app are provided to Athlon by the client company, so that Athlon can generate and provide login details for the parties concerned (username and temporary password).

#### E-driver

Athlon provides a totally interactive information and training program called E-Driver. Through implementation of the training program, E-Driver can be used to analyze and improve driving style and proactively promote a commitment to safe driving, which contributes to a reduction in accident rates.

Organizing and executing the training program is entrusted to experts who contact the vehicle driver or client company

directly for a preventive safety assessment and in order to provide a dedicated training program.

The personal data of recipients of the training program is shared with the experts (third-party providers) tasked by Athlon with organizing and executing the training program. The following data will be processed and collected from the the client company: name, e-mail address, license plate number.

Furthermore, Athlon will also collect other personal data received from its designated providers: driver risk index, recommended training courses for the driver, training courses signed up for and training courses completed. This data may be shared by Athlon with the client company.

### ***Leasing services***

Athlon also offers commercial leasing services.

In order to provide leasing services, Athlon concludes a contract with the client company, which shares with Athlon the name, address, city of residence, telephone number and e-mail addresses of its employees. Athlon may share personal data received with other leasing specialists, to enable these to contact service users and to provide the most suitable vehicle for lease.

Athlon processes the following data: vehicle license plate, associated costs, delivery location, lease period and company contact person. The processing of client personal data is necessary for management of the lease contract between Athlon and the client. It is in Athlon's interest to provide the client with the highest possible quality of service. Athlon shares information on lease service users with the client company for billing purposes.

Leasing service users may contact Athlon by e-mail, phone and website. In this case, personal data will be processed to deal with users' queries or requests. To this end, the following may be processed: name, contact information, correspondence with Athlon concerning queries or requests and any other personal data provided to Athlon that is needed in order to respond appropriately to the client company and the drivers of leased vehicles.

Athlon may also contact clients regarding leasing services provided.

### ***Acquisition of vehicles from leasing***

#### Acquisition process

Athlon processes personal data relating to the potential acquisition of vehicles from leasing. This includes execution of the acquisition contract, transfer of services and settlement of payment.

To this end, Athlon collects and processes the following data: name, gender, contact information, company name, commercial information and other details needed in order to complete the acquisition transaction, including bank account information. The processing of client personal data is necessary for execution and management of the acquisition contract.

Personal data may be shared with financial services partners.

Athlon may be contacted in various ways, such as by e-mail, phone and through the website. Athlon collects personal data at the time at which it is contacted or when additional information is provided by clients at Athlon centers; for example, when Athlon is sent questions, suggestions, compliments, claims or complaints or when quotations are requested for services. Athlon may contact the client in relation to possible acquisition of a vehicle.

The following data is processed for the aforementioned purposes: name, gender, contact person, name of company and any other information provided to Athlon in the text box on the contact form, where, for example, questions and queries may be submitted.

## **Marketing**

### Surveys

Athlon processes personal data when it periodically sends out questions and surveys, to request feedback on the level of service offered to the client. The following data is processed for such purposes: name, address, e-mail, license plate number and interests/hobbies.

If you do not wish to receive survey participation requests from Athlon, please send a request to the contacts set out in this statement, or opt out through the contacts set out in the survey itself.

### Marketing communications

Athlon may process client data when any marketing activities and corresponding communications are scheduled, to provide information on events, special offers and current and future products and services. To this end, the following personal data may be processed: name, address, phone number, e-mail address and interests/hobbies.

Athlon may contact clients regarding marketing communications, via e-mail, newsletters, flyers and magazines.

Prior to using personal data, Athlon requests consent for processing for purposes other than those of lease management. Clients who do not wish (or no longer wish) to receive marketing communications may easily opt out.

Athlon can also be contacted through the contact information set out in this statement, for the purpose of withdrawing consent.

## **Websites**

Athlon collects personal data through website contact; for example, via the contact form or through the sending of suggestions or complaints, or to request a quote for services offered.

The following data is processed for this purpose: name, contact information, name of the company concerned, and any other information provided on the contact form, through which it is possible to submit a suggestion or complaint.

### Social media

Athlon's website also contains links to social media pages, such as Facebook and LinkedIn pages and its Twitter feed.

In such cases, the following data is collected: name, e-mail address, photo, contact list and other information that may be provided by the user when a social media function is utilized.

Please note that Athlon is not responsible for the collection and processing of personal data by other companies and organizations, such as social media, including the processing of personal data disclosed to other companies or organizations in connection with Athlon's social media functions.

### Cookies

For the processing of personal data through cookies, please consult the relevant information at the following location <https://www.athlon.com/it/cookies>.

## **Work and careers**

A candidate's personal data is collected, including contact information (name, address, phone number, e-mail address), work and training experience and other information on working activities. This information is used by Athlon to respond to candidate applications, to process applications and to offer candidates access to new job opportunities.

Personal data is generated and processed to select candidates and to link each candidate with a specific job offer. The e-mail address is used to ensure proper registration, to contact the candidate during the selection process and to facilitate recruitment activities. Furthermore, candidates selected by Athlon will be able to access data for administrative purposes.

Athlon may collect and process special categories of personal data in cases where it is required by applicable laws in the country.

In addition to the processing of mandatory data and personal data that the candidate has voluntarily uploaded to Athlon systems, additional data may be collected (automatically) and processed. Data not supplied directly by the candidate may come, for example, from employment agencies and intermediaries and include sources accessible to the public.

The collection and processing of personal data are necessary to respond to candidate applications and to organize subsequent selection routes.

The recipients of the personal data processed are the parties involved in Athlon's selection and recruitment process. During the online application process, candidates can choose whether to make their data (including personal data) available for other applications.

## **Other purposes**

### Compliance with legislation and regulations

Athlon complies with the laws and regulations in force, including sector-specific recommendations and EC directives and regulations.

This means that it is in the interest of Athlon for the client's personal data to be treated in the most appropriate way, or in any case as required by the legislation in force, and used for reviewing sanctions lists, to perform due diligence, for the

prevention of money laundering and terrorist financing and other illegal financial activities, and to respond to requests from public and governmental authorities, such as the supervisory authorities, tax authorities and investigative agencies, including public and governmental authorities outside the country of residence.

#### Protection of assets and corporate interests

Athlon protects its assets and corporate interests.

This means that it is in the interest of Athlon for the personal data of clients to be treated as is appropriate and necessary to ensure approval by the clients themselves, to enforce contractual terms and conditions, to protect activities and intellectual property rights, to secure payment of amounts due to Athlon and to pursue available legal action or limit loss or harm that could be occasioned to it.

The personal data that is processed and/or shared depends both on the circumstances and on which among the purposes mentioned in the previous paragraph are applicable.

In principle, Athlon processes personal data only if requested for one of the purposes indicated in the previous paragraph.

#### Data analysis

It is in Athlon's interest to process personal data for the purpose of analysis and the development of new services and improvement of existing ones, and for identifying trends and evaluating the effectiveness of the activities performed.

For this purpose, Athlon may analyze vehicle information and other types of information referred to in this Notice, should this be necessary for one of the purposes referred to in the previous paragraph.

In particular, in this Privacy Notice, it is highlighted how Mercedes Benz Mobility AG (Mercedes Benz Mobility Risk Review) processes the personal data of the Customer during the preparation and execution of audits (such as risk-oriented audit planning and audit design) and audit advice, including administrative execution and completion of the audit engagement itself.

Personal data is processed according to the principles of reduction and minimization to the extent necessary, as permitted by applicable legal regulations, based on our obligations.

Unless otherwise indicated below, the terms "process" and "processing" include, for instance, the collection, use, disclosure and transfer of personal data (see article 4 no. 2 GDPR).

The data processed during the preparation and carrying out of the audits are provided by Athlon. In this context, the personal data of employees are processed, depending on the scope of the specific audit engagement.

In addition, data from Athlon's business partners and Customers are processed, including in accordance with the specific audit assignment. In this context, the following categories of personal data are processed:

- Customer name and Customer ID
- contractual data
- booking data

- financial data
- information on credit rating and payment behavior
- vehicle identification number, vehicle damage and vehicle condition data.

In order to obtain verification of relevant personal data from employees, Customers and business partners, the internal IT systems and applications of the Daimler group are used or interviews in compliance with internal rules, regulations and security procedures.

In carrying out the audit, on behalf of the Board of Management of Mercedes Benz Mobility AG as the delegating authority and within the scope of its supervisory duties, it ensures that both the legal requirements relating to compliance with correct corporate procedures and the internal regulations. The legitimate interest and the necessary balance with any conflicts of interest of the persons concerned are determined and documented based on the audit engagement.

Mercedes Benz Mobility AG (Mercedes Benz Mobility Risk Review) also assesses the effectiveness and efficiency of risk management, the internal control system, management and monitoring processes and company processes. The results of the assessments are also used to improve Athlon's internal processes.

The legal basis of the processing is art. 6 (1) f) GDPR, and in some circumstances, art. 6 (1) c) GDPR. The legal basis for the processing of employee data is the local legislation on the subject as well as the express information signed by them.

Employees are also required to provide their data based on the employment contract.

The duration of the retention of personal data is determined by the processing of the data described above for the purpose of keeping records, documentation and archiving.

Mercedes Benz Mobility AG (Mercedes Benz Mobility Risk Review) will keep and process your personal data for as long as necessary to fulfill the processing purposes described in this Privacy Notice. In general, the data is deleted within 8 (eight) weeks of the creation of the audit report and provided to the Board of Directors of Mercedes Benz Mobility AG.

Insofar as your personal data are subject to statutory retention obligations or form part of the documentation subject to statutory retention obligations, Mercedes Benz Mobility AG (Mercedes Benz Mobility Risk Review) will store this data for the duration of the retention period established by law.

#### **Access to Athlon's premises**

For those visiting Athlon's premises, personal data may be requested for security reasons. The data collected for this purpose is: name, contact information and, if applicable, the name of the Athlon employee being visited.

#### **Contracting parties of Athlon**

Should the client's personal contact details be included in the agreement between the contracting parties, Athlon will process the name, contact information and client's company name (legal person). Such processing is for communication

purposes. The contracting parties of Athlon may, for example, be: partners, service providers, customers.

### ***Athlon as data processor***

There are services for which Athlon has the role of data processor, on behalf of the client (e.g. company), such as fleet management services. The data controller, the client company, is responsible for the processing and use of personal data. In these circumstances, in the event of questions regarding the processing and protection of personal data, please contact your employer.

### ***To whom can personal data be transferred?***

The personal data that Athlon manages is treated as confidential and is accessible only if there is a real need to know. Athlon does not share the personal data it manages with third parties, unless such processing is necessary to manage the services offered to clients.

In addition to the above, Athlon shares personal data:

- within the Daimler group, with the companies belonging to it;
- with our service provider partners, such as dealers, body shops, workshops and tire service providers;
- with the partner companies involved in the sale and supply of our services;
- with third-party service providers that Athlon uses to process certain data on its own behalf, as is the case with suppliers in the areas of information technology, security, law, finance and accounting;
- with the supervisory authorities, tax authorities and investigative agencies, if Athlon is required to do so by law.

Athlon will make every effort to ensure that all third parties comply with applicable data protection laws.

To the extent that some personal data may be processed by third parties on behalf of Athlon and on the basis of its instructions, Athlon itself will ensure that the most appropriate technical, organizational and contractual measures are taken to ensure that such personal data is processed exclusively for the purposes set out in this Statement. Furthermore, Athlon will ensure that any third parties used comply with the applicable data protection laws and the provisions of this Statement.

### ***Does Athlon transfer personal data to any third-party countries or to international organizations?***

Given the multi-national structure of Athlon, personal data collected may be processed in a country other than the one in which Athlon has its registered office. Athlon ensures that if personal data is transferred to another country, appropriate technical protection measures will be adopted, including through agreements with third parties.

If personal data is transferred and processed outside the EU/EEA, Athlon will provide an adequate level of protection, in accordance with legislation currently in force.

### ***Security***

Athlon has implemented various technical and organizational measures in order to guarantee an adequate level of security

concerning risks relating to the processing of personal data, in compliance with legislation in force on data protection.

Athlon has set up security measures for its servers and networks based on best practices, using firewalls. Only identified and authorized persons may use Athlon systems. The locations where the data is stored are accessible only to authorized personnel and through advanced authentication systems.

If you become aware of any violation of your security, please inform Athlon as soon as possible using the following e-mail address

[protezione.dati@athlon.com](mailto:protezione.dati@athlon.com).

### ***For how long does Athlon store personal data?***

As a general rule, personal data is stored in compliance with legislation and with Athlon's internal regulations, which set out minimum and maximum storage periods. Personal data is therefore kept for the period necessary to implement the purposes described in this Statement, unless a longer retention period is required or permitted by law.

Regarding the IP address and the name of the internet service provider, which are stored only for security purposes, these will be deleted after seven days.

### ***Leasing services***

For leasing purposes, Athlon will retain the personal data received for the time necessary for the discharging of contractual obligations. This means that it is necessary to keep personal data at least for as long as the contract is in effect. Once the contract has expired, there may still be a need to process personal data, for claims handling, claims for damages or fines handling. Since Athlon can receive the fines of its customers up to two years after the end of the contract, personal data is kept up to and not beyond the discharging of all obligations and activities deriving from the contract, even after expiration of the same.

Athlon may process and store personal data for statistical purposes. For such purposes, only strictly necessary data (address and postal code) is used. Other personal data (e.g. name) will be deleted or made anonymous.

### ***Potential clients***

For potential clients whose lease requests are not accepted by Athlon, personal data collected during the preliminary examination is no longer needed. Athlon therefore deletes such data after discharging of the obligations and activities deriving from acceptance of the Offer.

### ***Vehicles from leasing***

For the acquisition of vehicles from leasing, Athlon keeps the customer's personal data for a period not exceeding discharging of the obligations and activities deriving from the acquisition contract.

### ***Work and careers***

The personal data entered in applications is saved and used for the application process.

A candidate can delete a user profile at any time using the "Delete User Profile" function. The user profile will be automatically deleted, without further notice, one year after

the last access to the application. Unless the candidate has given consent to the subsequent processing of his/her personal data, all data relating to a specific application will be deleted at the end of the application process, based on the laws in force.

Athlon takes appropriate measures to ensure that the processing of personal data is carried out in compliance with the principle that such personal data will not be held for longer than is necessary for the purposes of the processing for which it was collected.

The relevant regulatory provisions may be different in the various countries in which Athlon is located. The applicable retention periods may also differ depending on the type of data processed, the purpose of processing and other factors.

#### *Rights of clients*

In principle, the client, as the party concerned by the processing in accordance with personal data protection legislation, is entitled to request that Athlon allow it to access, rectify or delete personal data processed by the latter. Further, the client is entitled to limit the processing of personal data concerning it or to object to such processing. If consent has been provided for the collection and further processing of personal data, this consent can be revoked at any time, with effect from that point on.

Should a client intend to exercise one of its rights or ask any questions regarding personal data processing and protection, it may send an e-mail to the following address:

[protezione.dati@athlon.com](mailto:protezione.dati@athlon.com)

Should a client no longer wish to receive surveys or marketing communications, it is kindly requested to contact Athlon using the contact details given in this statement or to unsubscribe using the contact details given in the surveys or marketing communications. Clients are also entitled to object, at any time and free of charge, to the processing of personal data for marketing purposes, including profiling, to the extent that this is associated with such purposes.

Clients are also entitled to receive personal data from Athlon in a format with a layout that is easy to use and that can be scanned by a device. Furthermore, clients are entitled to instruct Athlon to transmit such data to another company or organization.

In the client's request to Athlon, please clarify the exact personal data to which the request refers. Athlon may ask the client to provide proof of its identity or other evidence, before acceding to and carrying out the request. Athlon will endeavor to comply with the request within a reasonable time frame and, in any case, in accordance with the terms stipulated by law.

Athlon may need to keep certain information for data storage purposes, to comply with other mandatory storage terms and/or to complete transactions initiated prior to the requesting of such changes or cancellations. There could be residual information remaining in Athlon's databases and other archives that is not removed.

#### ***Amendment to this Statement***

Athlon reserves the right to amend this Statement unilaterally and at any time. The latest version of the Statement is published on the Athlon website. Any changes to the Statement will come into effect from the date of publication on the Athlon website. The use of Athlon services by the client following amendment of the Statement shall denote acceptance of the same.

#### ***Questions and notifications***

Should you have any questions concerning this Statement, or personal data processing and protection, please send an e-mail to the following address: [protezione.dati@athlon.com](mailto:protezione.dati@athlon.com)

You may also submit a notification to the relevant [personal data protection authority](#).

I, the undersigned, hereby declare that I have received the information set out above.

In ..... on .....

\_\_\_\_\_  
Client (stamp and full signature)

I, the undersigned, in view of the Statement received

**I consent**  **I DO NOT consent**  
to the processing of my personal data including that which is considered to be in special categories of data.

\_\_\_\_\_  
Client (stamp and full signature)

Unless consent is given, it will not be possible to comply with contractual undertakings.

**I consent**  **I DO NOT consent**  
to my personal data being passed on to public bodies and private companies for the purposes set out in the Statement.

\_\_\_\_\_  
Client (stamp and full signature)

Unless consent is given, it will not be possible to comply with contractual undertakings.

**I consent**  **I DO NOT consent**  
to the processing of special categories of my personal data as set out in the preceding statement.

\_\_\_\_\_  
Client (stamp and full signature)