

**Your privacy is important to LeaseWeb Global B.V. (hereinafter “Leaseweb Global”). LeaseWeb Global is therefore pleased to provide this privacy statement to inform you of Leaseweb Global’s practices with respect to the collection, storage and use of your personal information (“Personal Data”). This privacy statement applies to the services (the “Leaseweb Global Services”) offered by Leaseweb Global, including Leaseweb Global’s website [www.leaseweb.com](http://www.leaseweb.com), Customer Portal at [secure.leaseweb.com](http://secure.leaseweb.com), LeaseWeb API and LeaseWeb Global newsletters.**

#### COMPLIANCE WITH INTERNATIONAL DATA PROTECTION LAWS, IN PARTICULAR THE GDPR

Leaseweb Global complies with international data protection laws, in particular the Regulation 2016/679/EU of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“GDPR”). Leaseweb Global has implemented the following requirements under the GDPR, including but not limited to:

- A record of our Personal Data processing activities.
- Adequate organizational and technical protection measures (more information can be found in this privacy statement).
- Request forms and internal instructions for Privacy by Design & Default, Data Portability, Data Subject Rights like the Right to be Forgotten.
- Updated General Conditions.
- Data Processor Agreements.
- A data breach procedure.
- An internal privacy policy.

#### HOW LEASEWEB GLOBAL MAY COLLECT INFORMATION ABOUT YOU IN OUR ROLE AS DATA CONTROLLER

Leaseweb Global may collect your Personal Data when:

- You browse or use Leaseweb Global’s website [www.leaseweb.com](http://www.leaseweb.com).
- You use Leaseweb Global’s Customer Portal at [secure.leaseweb.com](http://secure.leaseweb.com).
- You enter a promotional game of chance with Leaseweb Global.
- You participate in a Leaseweb Global survey.
- You subscribe to a Leaseweb Global newsletter.
- You use the Leaseweb Global API.

Leaseweb Global also collects Personal Data about you from Leaseweb affiliates, including LeaseWeb Netherlands B.V., LeaseWeb Deutschland GmbH, LeaseWeb UK Ltd., LeaseWeb CDN B.V., LeaseWeb Network B.V. LeaseWeb USA, Inc., LeaseWeb Asia Pacific PTE. Ltd. and LeaseWeb Australia Pty Ltd. (“Leaseweb Affiliates”).

#### WHAT KIND OF INFORMATION LEASEWEB GLOBAL MAY COLLECT ABOUT YOU IN OUR ROLE AS DATA CONTROLLER

Leaseweb Global may collect the following information about you:

- Your name, (business/private) address, phone number, date of birth, email address and personal identification numbers.
- Personal Data about how you interact with Leaseweb Global Services. This includes data such as, the website features you use, the services you purchase from the Leaseweb Affiliates, the web pages you visit, the time you spend on these pages, and the search terms you enter. This also includes data about your device, including IP address, device identifiers, regional and language settings, and data about the network, operating system, browser or other software you use to connect to the Leaseweb Global Services.
- Your account information with the various Leaseweb Affiliates – such as LeaseWeb services you ordered, domain name registration information, the IP addresses assigned to you, your customer IDs, service charges owed and received, the use of Leaseweb services or any other information related to your account.
- Information about your payment method, such as credit card number, bank account number or other banking information.
- Documents and information that certify your identity.

#### WHY LEASEWEB GLOBAL PROCESSES YOUR PERSONAL DATA IN OUR ROLE AS DATA CONTROLLER

Leaseweb Global processes your Personal Data for the following purposes:

- Conducting market research, conducting retention and customer satisfaction surveys, conducting marketing activities (including through email newsletters and social media and onsite/offsite and online/offline advertisement), conducting sales activities (including analyzing your Data and your use of LeaseWeb Affiliates’ services for making (personalized) offers and quotes with the aim of entering into a customer relationship, and/or maintaining, renewing or expanding a customer relationship with a LeaseWeb Affiliate) and offering promotional games of chance.
- The (i) provision of access to customers of the various LeaseWeb Affiliates to closed areas of LeaseWeb services, (ii) making available to customers, through these closed areas, information concerning the customers of LeaseWeb Affiliates and the use of services of LeaseWeb Affiliates, including information concerning invoices, name and contact details, and (iii) making available, through these closed areas information, tools to manage the services from the various LeaseWeb Affiliates.
- Facilitating through the LeaseWeb Global Services (i) the placement of orders for LeaseWeb Affiliates’ services, (ii) the communication between the LeaseWeb Affiliates and its customers, and (iii) the management of LeaseWeb Affiliates’ services by its customers.

#### SHARING YOUR PERSONAL DATA WITH THIRD PARTIES IN OUR ROLE AS DATA CONTROLLER

Leaseweb Global may share Personal Data about you with:

- LeaseWeb Affiliates. Leaseweb GlobalLeaseweb GlobalLeaseweb GlobalLeaseweb Global Please review the [privacy policies](#) of the various Affiliates to learn about their practices with respect to the collection, storage and use of your Personal Data.
- Law enforcement agencies, regulatory organisations, courts or other public authorities to the extent required by law.
- Credit reference agencies.

#### RETENTION PROCEDURES

Leaseweb Global will store your Personal Data as long as necessary to perform the purposes of processing as stated in this privacy statement.

**LEGAL GROUNDS**

To process your information as described above, we rely on the following legal bases:

- **Performance of a contract:** the use of your information may be necessary to perform the contract that you have with us. For example, if you use our services, we will use your information to carry out our obligation to complete and administer that service under the contract that we have with you.
- **Legitimate interests:** the processing is necessary for the purposes of the legitimate interests pursued by us, namely for information security. We also want to provide you with the best suitable content of the website, emails and newsletters, to improve and promote our products and services and the content on our website, and for administrative, fraud detection and legal purposes.
- **Consent:** we may rely on your consent to use your Personal Data for certain direct marketing purposes.

**TECHNICAL AND ORGANISATIONAL SECURITY PROCEDURES AND DATA TRANSFERS**

In accordance with international data protection laws, in particular the GDPR, we observe adequate procedures to prevent unauthorized access to, and the misuse of, Personal Data. We use appropriate business systems and procedures to protect and safeguard the Personal Data. We also use security procedures and technical and physical restrictions for accessing and using the Personal Data on our servers. Only authorized personnel are permitted to access Personal Data in the course of their work. Our business processes apply a series of security services are compliant with the industry security standards, including ISO 27001, SOC 1, HIPAA and PCI DSS, and NEN 7510.

Leaseweb Global has implemented the following, but not limited to, generic information security measures across its organisation: network segmentation, next generation firewalls, anti-virus software, full disk encryption of end-points, encrypted communication via SSL or VPN, Security Information and Event Management solutions, dedicated Security Operating Centre, security awareness training, segregation of duties, role-based access permissions (based on least-privilege), secure disposal facilities of confidential information, periodic pentesting of public facing services, secure development training, integrated security monitoring during development, tools to enable employees to work secure (such as password managers), physical security zones. Per application or communication, additional security measures can be implemented.

Leaseweb Global is frequently being audited by external parties to ensure it complies with relevant normative frameworks and controls within the Leaseweb Circle of Trust model. See [www.leaseweb.com/certifications](http://www.leaseweb.com/certifications) for more information.

**PRIVACY COUNSEL**

Our privacy counsel is positioned in our head quarter in Amsterdam, The Netherlands. This office serves as our international center of expertise for international data protection laws compliance, in particular GDPR compliance, effectively centralizing our connection with the Dutch privacy authority.

**YOUR RIGHTS**

In accordance with data protection laws, you have a number of rights regarding your Personal Data and the processing thereof:

- You can view and, if necessary, change your Personal Data in your account at any time.
- If you wish to know what information Leaseweb Global and other Leaseweb affiliates have collected about you.
- You also have the right to obtain from us the erasure of your Personal Data (right to be forgotten).
- In addition, you may, under certain circumstances, have the right to restriction of the processing of your Personal Data.
- You have the right to object, on grounds relating to your particular situation, at any time to processing of your Personal Data.
- You have the right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller when the processing is based on your consent or is necessary for the performance of a contract.

If you have any requests regarding the abovementioned, please contact us using the contact details below. If we do not grant your request, we will inform you about the reason why.

**CONSENT AND WITHDRAWAL OF CONSENT**

You are entitled to withdraw your consent at any time by giving us notice. Upon receipt of a notice where your consent is withdrawn, we will without undue delay stop processing your Personal Data to the extent it is required under law. Please use the contact information at the bottom of the page should you wish to withdraw your consent given under this privacy statement.

**STATEMENT CHANGES**

Leaseweb Global reserves the right to change the privacy statement, and will post any revisions on the Leaseweb website [www.leaseweb.com](http://www.leaseweb.com). Leaseweb Global advises you to check this page regularly to see if any changes have been implemented.

**CONTACT INFORMATION**

If you have any requests, questions or suggestions about Leaseweb Global's privacy practices, please send an email to [privacy@leaseweb.com](mailto:privacy@leaseweb.com).

**LeaseWeb Global B.V.**, a private limited liability company, incorporated under the laws of the Netherlands and with its offices at Luttenbergweg 8, 1101 EC Amsterdam, The Netherlands, listed with the Chamber of Commerce under number 30141839.

This privacy statement was most recently changed on 1 April 2018.