

GDPR and privacy is important to LeaseWeb CDN B.V. (hereinafter “Leaseweb CDN”) and its business relations. Leaseweb CDN duly informs you of Leaseweb CDN’s practices with respect to the possible processing of personal data while doing business with you (“Personal Data”).

COMPLIANCE WITH INTERNATIONAL DATA PROTECTION LAWS, IN PARTICULAR THE GDPR

Leaseweb CDN 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 CDN 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.
- A Data Processor Agreement in our role as data controller and data sub-processor.
- A data breach procedure.
- An internal privacy policy.

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

Leaseweb CDN may collect your Personal Data when:

- You order a service from Leaseweb CDN.
- You enter a promotional game of chance with Leaseweb CDN.
- You participate in a Leaseweb CDN survey.
- You subscribe to a Leaseweb CDN newsletter.
- You ask Leaseweb CDN for more information about a LeaseWeb service, or contact Leaseweb CDN with a question, comment or complaint.
- You submit an abuse notification to Leaseweb CDN.
- You use the Leaseweb CDN network, Leaseweb CDN infrastructure and/or other Leaseweb CDN services.

Leaseweb CDN also collects Personal Data about you from LeaseWeb Global B.V. (hereinafter “Leaseweb Global”) and other affiliates of Leaseweb CDN. In addition, Leaseweb CDN may collect Personal Data about you from fraud-prevention agencies, referral partners, business directories and credit reference agencies.

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

Leaseweb CDN may collect the following information about you:

- a. Your name, (business/private) address, phone number, date of birth, email address and personal identification numbers.
- b. Your Leaseweb CDN account information – such as Leaseweb CDN services you ordered, domain name registration information, the IP addresses assigned to you, your customer ID, service charges owed and received, the use of Leaseweb CDN services or any other information related to your account.
- c. Your contact with Leaseweb CDN – such as a note or recording of a call you make to Leaseweb CDN, a chat record when you engage in a chat session with Leaseweb CDN, an email or letter you send to Leaseweb CDN or other records of any contact you have with Leaseweb CDN.
- d. Information about your payment method, such as credit card number, bank account number or other banking information.
- e. Information provided by you to Leaseweb CDN when you notify Leaseweb CDN of a (suspected) breach of Leaseweb CDN’s acceptable use policies.
- f. Video footage of you when you are in a Leaseweb CDN datacenter or the public space outside and inside our offices.
- g. Documents and information that certify your identity.

LEGAL GROUNDS

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

1. **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.
2. **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 and for sales and marketing processes with Affiliates including Leaseweb Global.

Consent: For certain marketing purposes, you are free to withdraw your consent at any time.

You are free to decide whether or not to share certain Personal Data (if any) with us for direct marketing purposes. However, if you decide not to provide certain Personal Data; or if you withdraw your consent thereto at a latter moment, this may have affect how you experience our marketing for similar services.

WHY LEASEWEB CDN PROCESSES YOUR PERSONAL DATA IN OUR ROLE AS DATA CONTROLLER

Leaseweb CDN processes your Personal Data for, among others, the purposes as described below. For the purpose of clarity, the letters indicate which information may be processed for such purpose (see our section ‘WHAT KIND OF INFORMATION LEASEWEB CDN MAY COLLECT ABOUT YOU IN OUR ROLE AS DATA CONTROLLER’) and the numbers behind each processing purpose indicate on which legal ground the processing takes place (see our section ‘LEGAL GROUNDS’):

- Processing of Orders contracts and provision of services, including full customer verification.
- Conducting market research, conducting retention and customer satisfaction surveys, conducting marketing activities (including through email newsletters, social media and onsite/offsite and online/offline advertisement), conducting sales activities (including analyzing your Personal Data and your use of Leaseweb CDN 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) and offering promotional games of chance.

- Communicating with customers (i) to provide information about services of Leaseweb CDN and affiliated companies, (ii) to provide information about offers, orders, provision of services, order status and payment, (iii) to provide support and maintenance services, (iv) to handle complaints, and (v) to answer questions from (potential) customers.
- Performing financial processes, including (i) calculating, invoicing and collecting of service charges, (ii) processing financial transactions regarding the acceptance of orders, and (iii) granting debt collection rights to third parties.
- Investigating creditworthiness and risk management, including prevention of overextending credit to (potential) customers and verifying whether (potential) customers will be able to comply with financial obligations.
- Investigating and processing suspected violations of Leaseweb CDN's Policies.
- Ensuring the security of persons, goods and objects, and performing fraud detection.
- Conducting legal processes, including (i) conducting legal proceedings, and (ii) collecting evidence for civil legal proceedings relating to you.
- Complying with statutory obligations, including (i) provision of data to authorized authorities in the context of criminal investigations, (ii) complying with (applicable) data retention obligations, and (iii) the provision to third parties of Data concerning customers in connection with an infringement of these third parties' rights.
- Establishing the identity of customers or third parties, including in relation to the provision of access to data centers and our offices..

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

Leaseweb CDN may share Data about you with:

- It's group affiliates including Leaseweb Global for the purposes of financial, tax, sales, marketing and operational tools and services (including the websites www.leaseweb.com , the Leaseweb Customer Portal and the Leaseweb API) that may be used to order or manage Leaseweb CDN Services or to communicate with Leaseweb CDN. Please review the Privacy Statement of Leaseweb Global on our website to learn about its practices with respect to the collection, storage and use of your Data.
- Suppliers or agents involved in delivering the services you've ordered with Leaseweb CDN.
- Credit reference, fraud prevention or business scoring agencies, or other credit scoring agencies.
- Domain name registries when Leaseweb CDN registers a domain name on your behalf.
- Debt collection agencies or other debt recovery organisations.
- Law enforcement agencies, regulatory organisations, courts or other public authorities to the extent required by law.
- A Leaseweb CDN customer, if you notify Leaseweb CDN that this customer use of Leaseweb CDN services violates the Leaseweb CDN's Policies or applicable law.
- A third party that has claimed that your use of the Leaseweb CDN services violates the Leaseweb CDN's Policies or applicable law (to the extent such sharing is required by law).

LEASEWEB CDN IN ITS ROLE AS SUB-PROCESSOR

Personal Data hosted, transmitted or processed on infrastructure owned by you or leased from Leaseweb CDN is governed by this paragraph. The customer of Leaseweb CDN that owns or has leased Leaseweb CDN infrastructure, will be responsible for determining the purposes and means of the processing of Personal Data, and this Leaseweb CDN customer (or its customers) will be the data controller in regards to such processing. If at any time Leaseweb CDN has access to personal data stored on infrastructure owned by a Leaseweb CDN customer or leased from Leaseweb CDN, then Leaseweb CDN shall be a data sub-processor, and any actions performed by Leaseweb CDN in relation to such data shall be solely governed by the agreement concluded between Leaseweb CDN and its customer.

RETENTION PROCEDURES

Leaseweb CDN will store your Personal Data as long as necessary to perform the purposes of processing as stated in this Privacy Statement.

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 CDN 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 CDN 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 for more information.

DATA PROTECTION OFFICER (DPO)

Our Data Protection Officer ("DPO") is positioned in the Leaseweb Global headquarters 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 as the permitted one-stop shop facility for the DPO.

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 CDN, Leaseweb Global and other affiliates of Leaseweb CDN have collected about you.

- If you want to make changes to the Personal Data you have seen you cannot change in your account.
- 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.

STATEMENT CHANGES

Leaseweb CDN reserves the right to change the Privacy Statement, and will post any revisions on the Leaseweb website www.leaseweb.com. Leaseweb CDN 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 CDN's privacy practices, please send an email to privacy@leaseweb.com.

LeaseWeb CDN B.V., a private limited liability company, incorporated under the laws of the Netherlands and with its offices at Hessenbergweg 95, 1101 CX Amsterdam, The Netherlands, listed with the Chamber of Commerce under number 55685986.

This Privacy Statement was most recently changed on 1 November 2020.