

COMPLIANCE WITH INTERNATIONAL DATA PROTECTION LAWS, IN PARTICULAR THE GDPR

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”) if any. This privacy statement applies to Leaseweb Global’s website www.leaseweb.com, Customer Portal at secure.leaseweb.com, Leaseweb Global API and Leaseweb Global newsletters and Leaseweb Global BV departments.

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 Sales Terms and Conditions and Master Procurement Agreement.
- Data Processor Agreements for your position as controller or processor.
- A data breach procedure.
- An internal Leaseweb global privacy policy.

WHEN LEASEWEB GLOBAL MAY PROCESS PERSONAL DATA 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.
- You use Leaseweb Global’s Customer Portal at secure.leaseweb.com.
- You enter and we apply our Compliance and Financial procedures
- You participate in a Leaseweb Global survey.
- You subscribe to a Leaseweb Global marketing newsletter.
- You use the Leaseweb Global API.

Leaseweb Global also collects Personal Data about you from Leaseweb branded companies, 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”). Leaseweb is the brand name under which the various independent Leaseweb companies operate. Leaseweb International Global B.V. is a separate and distinct entity incorporated a particular geographic area.

WHAT PERSONAL DATA LEASEWEB GLOBAL MAY PROCESS ABOUT YOU IN OUR ROLE AS DATA CONTROLLER

Leaseweb Global may collect the following information about your business:

- Your business contact persons names, address, phone number, date of birth, email address and personal identification numbers or legally authorized representatives.
- Personal Data about how you interact with Leaseweb Global. 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.
- 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.

LEGAL GROUNDS

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

- **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 non contractual direct marketing purposes. Whenever we rely on your consent for processing your Personal Data, you are free to withdraw your consent at any time. See also the section ‘**CONSENT AND WITHDRAWAL OF CONSENT**’.

You are free to decide whether or not to share certain Personal Data (if any) with us. 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 services and, in some cases, whether we can provide you our services or extend any contract.

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 marketing activities (including analyzing your Data and your use of Leaseweb Affiliates’ services for making and/or maintaining, renewing or expanding a customer relationship with a Leaseweb Affiliate.
- The (i) provision of access to the Customer Portal for customers of the various Leaseweb Affiliates (ii) making available to customers, through these closed areas, information the use of services of Leaseweb Affiliates, including information concerning Leaseweb Affiliates like invoices, orders name and contact details, and (iii) making available, through these closed areas information, tools to manage the services from the various Leaseweb Affiliates and any (iv) financial procedures and (v) any Compliance procedures.

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

Leaseweb Global may share Personal Data about you with:

- Leaseweb Affiliates. The Leaseweb Affiliates offer tools and services that may be used to order or to communicate with Leaseweb Global. Leaseweb Global may share your Data with Leaseweb Affiliates in connection with said tools and services. 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 and Compliance KYC reference agencies.

DATA TRANSFERS

Since Leaseweb Global may procure from suppliers located in many different countries around the world, it is important that we comply with data privacy laws in many jurisdictions. In our role as data processor we may require to implement the [Standard Contractual Clauses](#) to enable the lawful transfer of Personal Data processed by suppliers from the European Economic Area and Switzerland to other countries globally. In addition, Leaseweb Affiliates outside of the EEA and Switzerland may implement Standard Contractual Clauses upon request of their EU based customer to set out the Leaseweb Affiliate commitment to privacy and data protection when (sub) processing data in connection with the provision of products and services in connection with the provision of such products and services under the applicable Sales Contracts.

RETENTION PROCEDURES

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

TECHNICAL AND ORGANISATIONAL MEASURES

In accordance with international data protection laws, in particular the GDPR, we aim to 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 and apply our entity split approach. We also use security procedures and technical and physical restrictions for accessing and using the Personal Data on our servers. Our privacy policy is to grant only authorized personnel permission 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. 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 for more information.

Leaseweb Global has implemented the following 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.

DATA PROTECTION OFFICER (DPO)

Our Leaseweb DPO is positioned in our headquarters in Amsterdam at Leaseweb Global, 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.

RIGHTS

In accordance with data protection laws, as a data subject 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. You will keep the Personal Data up to date and correct.
- If you wish to know what information Leaseweb Global and other Leaseweb entities have collected about you.
- You also have the right to obtain from us the erasure of your Personal Data (right to be forgotten) in case permitted and mandatory.
- In addition, you may, under certain circumstances, have the right to restrictions of the processing of your Personal Data.
- You have the right to object, at any time to processing of your Personal Data in case permitted and mandatory.
- You have the right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format.
- You have the right to lodge a complaint with the competent supervisory authority for purpose of data portability.

If you have any requests regarding the abovementioned or if you want to exercise any of the rights set forth above, please contact us using the contact details below for privacy questions. 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 in relation to communication based on your consent as legal ground. 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 <https://www.leaseweb.com/legal/gdpr>. Leaseweb Global advises you to check this page regularly to see if any changes have been implemented. This privacy statement was most recently changed on 1 April 2019.

CONTACT INFORMATION

If you have any requests, questions or suggestions about Leaseweb Global's privacy practices, please send an email to 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 60593652.