

GDPR and privacy is important to Leaseweb UK Limited (hereinafter “Leaseweb UK”) and its business relations. Leaseweb UK duly informs you of Leaseweb UK’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 EU GENERAL DATA PROTECTION REGULATION AND UK GENERAL DATA PROTECTION REGULATION

Leaseweb UK 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**”) and UK General Data Protection Regulation (“**UK GDPR**”) Leaseweb UK has implemented the following requirements under the GDPR and mentioned regulations, including but not limited to:

- An inventory 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 and, 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 Leaseweb privacy policy.

WHEN LEASEWEB UK MAY PROCESS PERSONAL DATA ABOUT YOU IN LEASEWEB’S ROLE AS DATA CONTROLLER

Leaseweb UK may collect your Personal Data when:

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

WHAT PERSONAL DATA LEASEWEB UK MAY PROCESS ABOUT YOU IN LEASEWEB’S ROLE AS DATA CONTROLLER

Leaseweb UK may collect the following information about your business:

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

WHY LEASEWEB UK PROCESSES YOUR PERSONAL DATA IN LEASEWEB’S ROLE AS DATA CONTROLLER

Leaseweb UK processes your Personal Data for the following purposes:

- Processing of orders, contracts and provision of services.
- 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 UK services for making (tailormade) offers and quotation 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 UK 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 fees , (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 UK’s acceptable use policy.
- 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 UK may share Data about you with:

- Its group affiliates including Leaseweb Global B.V. for the purpose 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 UK Services or to communicate with Leaseweb UK. 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.
- Partners or agents involved in delivering the services e ordered with Leaseweb UK.

- Credit reference, fraud prevention or business scoring agencies, or other credit scoring agencies.
- Domain name registries when Leaseweb UK 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 UK customer, if you notify Leaseweb UK that this customer use of Leaseweb UK services violates the Leaseweb UK's Acceptable Use Policies or applicable law.
- A third party that has claimed that your use of the Leaseweb UK services violates the Leaseweb UK's Acceptable Use Policies or applicable law (to the extent such sharing is required by law).

LEASEWEB UK IN ITS ROLE AS PROCESSOR

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

DATA RESIDENCY

Your data hosted on your own infrastructure or on Leaseweb's infrastructure is located in the United Kingdom.

RETENTION PROCEDURES

Leaseweb UK 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 grounds:

- **Performance of a contract:** the use of your business personal data 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 and for sales and marketing processes with affiliates including Leaseweb Global.
- **Consent:** we may rely on your consent to use your Personal Data for certain direct marketing purposes to third parties that cannot be qualified as the following: prospects that granted consent in an earlier stage, customers, suppliers, consultants or other contractual relationships

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 if and to the extent it is required and permitted 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.

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 and PCI DSS. See www.leaseweb.com/certifications for more information.

Leaseweb UK 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.

In our role as data processor, Leaseweb UK can provide to its customers a Data Processing Agreement (DPA) as required under the GDPR. If you as EU customer, supplier, or partner specifically require a Data Processing Agreement with Leaseweb UK, please contact us using the contact details below.

DATA PROTECTION OFFICER (DPO)

Our Data Protection Officer ("DPO") registered with the Dutch supervisory authority under number FG008004 is the designated privacy professional for Leaseweb UK, based at our global headquarters in 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 supervisory authority as the permitted one-stop shop facility for the DPO. The DPO can be reached at: privacy@uk.leaseweb.com.

RIGHT TO LODGE A COMPLAINT WITH YOUR LOCAL SUPERVISORY AUTHORITY

You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal data. We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

YOUR RIGHTS

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

- You can view and, if necessary, change your Personal Data in your account at any time in case duly required.
- If you wish to know what personal data has been processed.
- You also have the right to obtain from us the erasure of your Personal Data (right to be forgotten) in case and to the extent duly required and permitted.
- In addition, you may, under certain circumstances, have the right to restriction of the processing of your Personal Data in case and to the extent duly required and permitted.
- You have the right to object, on grounds relating to your particular situation, at any time to processing of your business 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 (data portability).

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

RIGHT TO LODGE A COMPLAINT WITH YOUR LOCAL SUPERVISORY AUTHORITY

You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal data. We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

STATEMENT CHANGES

Leaseweb UK reserves the right to change the privacy statement, and will post any revisions on the Leaseweb website <https://www.leaseweb.com/legal/personal-data-protection-acts>. Leaseweb UK 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 UK's privacy practices, please send an email to privacy@uk.leaseweb.com.

Leaseweb UK Limited a private limited liability company, incorporated under the laws of England and Wales with its offices at Office 6.01, 20 Eastbourne Terrace, London W2 6LG, United Kingdom listed with the Registrar of Companies House under number 10879718.