

**Your privacy is important to Leaseweb Global B.V. (hereinafter “Leaseweb Global”). This Privacy Statement informs 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](http://www.leaseweb.com), Customer Portal at [secure.leaseweb.com](http://secure.leaseweb.com), Leaseweb Global API and Leaseweb Global newsletters and Leaseweb Global BV departments.**

**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.
- 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.
- A Data Processing Agreement in our role as Data Controller or Data Processor.
- A Personal 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](http://www.leaseweb.com).
- You use Leaseweb Global’s Customer Portal at [www.secure.leaseweb.com](http://www.secure.leaseweb.com).
- If you purchase a service through the website we may apply 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 Network B.V., Leaseweb USA, Inc., Leaseweb Singapore PTE. Ltd., Leaseweb Australia Pty Ltd, Leaseweb Hong Kong Ltd, Leaseweb Japan K.K. and Leaseweb Canada Inc. (“Leaseweb Affiliates”). Leaseweb is the brand name under which the various independent Leaseweb Sales Entities operate. Leaseweb Global B.V. is a separate and distinct entity incorporated in 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, 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.

**RETENTION PROCEDURES**

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

**DATA RESIDENCY**

Leaseweb Global as a shared services center and global headoffice processes, stores and transfers any Personal Data for itself as Data Controller and for any Leaseweb Affiliates and its contract parties as Data Processor in the Netherlands, in accordance with any EU adequacy decision and appropriate Standard Contractual Clauses as applicable.

**DATA SOVEREIGNTY**

The Personal Data processed or stored by Leaseweb Global in its capacity a global headoffice and shared service center is subject to the laws and regulations of the Netherlands and of the EU. Leaseweb Global thereby benefits on its own behalf, and on behalf of its Leaseweb Affiliates and any related contract parties from its EU based ultimate ownership, management and control including cybersecurity matters.

Leaseweb Global adheres to EU Data Sovereignty, and advocates for its Protection of European Data against Unlawfull Access and its Immunity for Non EU law.

**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, for example information security. We also endeavour to provide you with the best suitable content through the website, emails and newsletters, to improve and promote our products and services, and to enhance our administrative functions, fraud detection and legal purposes and marketing processes.
- **Consent:** For certain marketing advertisement, you are free to withdraw your consent at any time.

**CONSENT TO RECEIVE DIRECT MARKETING EMAILS AND WITHDRAWAL OF CONSENT**

You are free to decide whether 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 later moment, this may have affect how you experience our marketing for similar services. You are entitled to withdraw your consent by sending an email to the privacy email address listed below, or from direct marketing communication by opting out from such communications. Upon receipt of your opt-out request, we will opt you out from the direct marketing list.

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

Leaseweb Global processes your Personal Data for the following purposes:

- Conduct market research, retention and customer satisfaction surveys, marketing activities (including through email newsletters and social media and onsite/offsite and online/offline advertisement), marketing activities (including analyzing your Personal Data and your use of Leaseweb Affiliates' services for making and/or maintaining, renewing or expanding a customer relationship with a Leaseweb Affiliate.
- (i) Provide access to the Customer Portal for customers of the various Leaseweb Affiliates (ii) make available to customers, through these closed areas, information regarding the use of services of Leaseweb Affiliates, including information concerning Leaseweb Affiliates like invoices, orders name and contact details, and (iii) make 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 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 Personal Data with these Leaseweb Affiliates in connection with said tools and services. Please review the [Privacy Statements](#) of the various Leaseweb 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.

**TECHNICAL AND ORGANISATIONAL MEASURES**

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 security procedures to protect and safeguard the Personal Data and apply an 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 that are compliant with the industry security standards, such as 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](http://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, 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.

**DATA PROTECTION OFFICER ("DPO")**

Our DPO registered with the Autoriteit Persoonsgegevens under number FG008004, is positioned at our global headquarters 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 Autoriteit Persoonsgegevens as the lead supervisory authority under the one-stop shop facility for the DPO. The DPO can be reached at: [privacy@leaseweb.com](mailto:privacy@leaseweb.com).

**YOUR 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 Customer Portal account at any time in case duly required.
- You can request the Personal Data processed about you.
- You also have the right to obtain from us the erasure of your Personal Data after the termination of the Sales Contract ("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 restrictions of the processing of your Personal Data.

- You have a right to object against the processing of your Personal Data for direct marketing purposes (e.g., per electronic message, per phone or postable mail) by making use of the opt-out button in communications emails and/or rejected the opt-in.
- 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 (personal 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.

**RIGHT TO LODGE A COMPLAINT WITH YOUR LOCAL SUPERVISORY AUTHORITY**

You have a right to lodge a complaint with the 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. In the Netherlands, the competent authority for Leaseweb NL is: Autoriteit Persoonsgegevens, located at Hoge Nieuwstraat 8, 2514 EL The Hague, The Netherlands, <https://www.autoriteitpersoonsgegevens.nl/>.

**STATEMENT CHANGES**

Leaseweb Global may modify or amend this Privacy Statement from time to time as our business practices and legal requirements evolve. If this Privacy Statement is modified, Leaseweb Global will provide notice of the change by posting the updated Privacy Statement 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 Hessenbergweg 95, 1101 CX Amsterdam, The Netherlands, listed with the Chamber of Commerce under number 60593652.