

PRIVACY STATEMENT
LEASEWEB GLOBAL B.V.

This Privacy Statement provides information on Leaseweb Global BV's (Leaseweb Global", "we", "our") practices as the website operator with respect to any processing of personal data ("Personal Data") in relation to www.leaseweb.com, the Leaseweb Customer Portal(s) at www.secure.leaseweb.com (together referred to as the "Leaseweb Website") as well as the use of the Leaseweb API.

DATA PROTECTION LAWS, IN PARTICULAR THE EU GDPR

Leaseweb Global as operator of the Leaseweb Website is subject to EU General Data Protection Regulation 2016/679/EU ("EU GDPR") and the Dutch GDPR Implementation Act ("Uitvoeringswet AVG") when it processes the personal data it collects about you via the Leaseweb Website. With respect to this processing, Leaseweb Global shall act as controller within the meaning of the EU GDPR.

THE PERSONAL DATA WE COLLECT

- Use of the Leaseweb Website: when you visit the Leaseweb Website we may automatically collect certain personal data such as:
 - IP address, the pages you visited and your usage behavior, device information, device identifiers, regional and language settings, and data about the network you are using, operating system, browser or other software used to connect to the Leaseweb Website, and cookies and similar tracking technologies.
- Direct marketing and advertising: we collect your Personal Data to market, advertise and promote the Leaseweb services.
- Use of the Leaseweb API: your login credentials and account preferences.
- Payment for the Leaseweb services: information about your payment method, such as credit card number, bank account number or other banking information.

HOW WE USE YOUR PERSONAL DATA

- To provide the Leaseweb offerings through the Leaseweb website.
- To operate and improve the Leaseweb Website functionality, services and user experience.
- We may use your Personal Data to communicate with you through different channels such as by chat, email, or other webforms to respond to your requests. We may conduct market research, retention and customer satisfaction surveys, direct marketing activities (including through email newsletters and social media), analyzing your Personal Data and your use of Leaseweb Sales Entity's services for maintenance and/or improvement of the customer relationship.
- You may opt out from our direct marketing communications at any time by sending an email to the legal email address listed below.
- To provide you access to the Leaseweb Customer Portal, information regarding the use of Leaseweb Sales Entities' services including information concerning the relevant Leaseweb Sales Entity such as invoices, business contact details, as well as tools made available by Leaseweb Global to manage the services of the relevant Leaseweb Sales Entity.
- Fraud and abuse prevention: we may use your Personal Data and/or information to detect fraud and abuse in order to protect the security of our customers, Leaseweb and third parties.

SHARING YOUR PERSONAL DATA

We do not sell your Personal Data. However, Leaseweb Global may share your Personal Data, if any with:

- The Leaseweb Sales Entity as the cloud service provider for the execution of the services purchased.
- Law enforcement, courts or other public authorities to the extent mandatory and required by law.
- Credit agencies including banks and payment providers, to the extent required by law.

LEGAL GROUNDS

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

- **Legitimate interests:** the processing is necessary for the purposes of the legitimate interests pursued by us or by the Leaseweb Sales entity. These legitimate interest are: the execution of the sales contract concluded between the relevant Leaseweb Sales Entity and customer, to provide you with the best to provide you with the best suitable content on the Leaseweb Website, direct marketing, to improve and generally promote our services, and to enhance our administrative functions, information security, fraud detection and legal purposes.
- **Consent:** For certain direct marketing activities, you are free to withdraw your consent at any time.

DATA RETENTION

We store and retain your Personal Data as long as necessary to fulfill the purposes as described in this Privacy Statement or to comply with Dutch and EU legal obligations. After the retention period, your (personal) data will be securely deleted or anonymized.

TECHNICAL AND ORGANIZATIONAL SECURITY MEASURES

In view of the EU GDPR, Leaseweb has taken and will maintain the appropriate technical and organizational security measures for protection of the security, confidentiality and integrity of Customer's Personal Data as described below.

Leaseweb not only assures a level of security but also of cybersecurity and business resilience which follow from Leaseweb obtaining the following certifications and assurance reports: ISO 27001, NEN7510, SOC1, PCI DSS.

TECHNICAL MEASURES

- **Data Encryption:**
 - Full disk encryption of all Leaseweb managed employee endpoints (data at rest).
 - Leaseweb has strong cryptography & security protocols with respect to data transmission via TLS or VPN (data in transit).
- **Access Controls:**
 - Access permissions based on least-privilege and need-to-know.
 - We have policies and procedures in place for on- and offboarding of Leaseweb employees with regards to access management.
 - Robust authentication and password related policies are in place and monitored.

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- Tools are made available to enable Leaseweb employees to work securely (such as password manager, VPN client, endpoint protection on all Leaseweb employee endpoints).
- **Secure Development:**
 - Code changes require a six-eyes principal.
 - (Security) Configuration of servers is based on infrastructure-as-code where possible.
 - All development teams are audited by the Leaseweb's security team twice a year based on a security maturity model.
 - Segregation between development, test and production environments.
 - Version control on Leaseweb's codebase.
- **Network Security:**
 - Network segmentation on Leaseweb's internal networks.
 - Firewalls are used in Leaseweb's internal network.
 - Intrusion detection systems are used within Leaseweb's internal network.
- **Vulnerability Management:**
 - Anti-virus software with EDR capabilities is installed on every Leaseweb employee endpoint to detect and stop the abuse of vulnerabilities.
 - Vulnerability monitoring, pentesting and red-teaming exercises are performed.

Organizational Measures

- **Information Security Governance:**
 - Leaseweb operates an Information Security Management System ("ISMS"), conforming to the ISO 27001 standard.
 - This ISMS is audited on an annual basis by internal as well as external auditors.
 - Periodic contact with interested parties, such as security service providers, government and peer organisations to exchange threat intelligence and vulnerability information.
 - Leaseweb has a dedicated IT Security department.
- **Data Deletion:**
 - Wiping of Leaseweb equipment in use by Customer after termination of the Sales Contract.
 - Physical destruction of broken hard drives.
 - Secure paper disposal facilities are available.
- **Employee Training:**
 - Leaseweb employees have periodic mandatory security awareness training with varying topics including privacy awareness.
 - Periodic phishing simulations for all Leaseweb employees.
- **Risk management:**
 - Security risk assessments are performed on a periodic basis.
 - A security risk register is maintained and updated.
- **Vendor Management:**
 - Periodic vendor screening to evaluate and manage risks related to existing and new vendors.
- **Physical Security:**

Data centers and offices are secured to prevent unauthorized access:

 - Periodic reviews of physical security authorizations.
- **Documentation and Record-Keeping:**
 - Leaseweb maintains records of security policies and procedures.
 - Records are kept in our internal documentation and are updated periodically.
- **Continuous Monitoring of Leaseweb's internal IT environment by:**
 - Security information and event management ("SIEM") tooling
 - A third-party Security Operating Center ("SOC") that monitors the internal IT environment.
- **Audits and certifications:**
 - Internal auditing: Leaseweb performs internal audits on security related controls on a yearly basis.
 - External auditing:
 - PCI-DSS 4.0 certified
 - ISO 27001:2022 certified

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- ISAE3402 type 2 (SOC1) assurance report
- NEN 7510:2017 assurance report

DATA RESIDENCY AND DATA SOVEREIGNTY

The Leaseweb Website and Leaseweb API are operated and stored in the Netherlands. As such, any Personal Data processing is subject (only) to the laws and regulations of the Netherlands and of the EU.

Leaseweb Global thereby benefits from its EU based ultimate ownership, management and control including cybersecurity workforce, with EU data localization, EU residents support, EU workload management under EU law (only) in its position as global head office and intercompany shared services provider. Leaseweb Global adheres to EU data sovereignty principles, and advocates for the PUA criteria (Protection of European Data against Unlawful Access).

DATA PROTECTION OFFICER ("DPO")

Leaseweb Global has a formal DPO registered with the Autoriteit Persoonsgegevens under number FG008004, positioned at in Amsterdam, The Netherlands. Leaseweb Global serves as the global intercompany shared service provider for its EEA/ EU Leaseweb Affiliates related to the Dutch Autoriteit Persoonsgegevens as the lead supervisory authority under the one-stop shop facility. The DPO can be reached at: legal@leaseweb.com.

YOUR DATA PROTECTION RIGHTS

Under the EU GDPR, you as a data subject have a number of rights regarding your Personal Data:

- You can request access to the Personal Data processed about you.
- The right to obtain erasure of your Personal Data ("Right to be Forgotten").
- Right to restrictions of the processing of Personal Data.
- The right to object against the processing of Personal Data for direct marketing purposes (a) by making use of the opt-out button in marketing communications emails or (b) by using the "Data Subject Rights Request Form" found on the Leaseweb Website or (c) by sending an email to privacy@leaseweb.com.
- Data portability: the right to receive Personal Data, in a structured, commonly used and machine-readable format and have the right to transmit those when the processing is based on your consent or is necessary for the performance of a contract.
- The right to withdraw your consent at any time, when the processing of your Personal Data is based on the legal ground of consent.

To exercise some of your rights, please contact us at "Data Subject Rights Request Form" found on the Leaseweb Website or send an email to privacy@leaseweb.com. You also have a right to lodge a complaint with the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*) at <https://www.autoriteitpersoonsgegevens.nl/>. We ask that you please attempt to resolve any issues with Leaseweb Global by sending us an email first before contacting the Dutch Data Protection Authority.

UPDATES TO THIS STATEMENT

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.

CONTACT INFORMATION

Our Data Protection Officer is registered with the Autoriteit Persoonsgegevens under number FG008004 and positioned at our headquarters in Amsterdam, The Netherlands. If you have any requests, questions or suggestions about our 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 Hessenbergweg 95, 1101 CX Amsterdam, The Netherlands, listed with the Chamber of Commerce under number 60593652.