

PRIVACY STATEMENT
LEASEWEB UK LIMITED

GDPR and privacy is important to Leaseweb UK Limited (hereinafter “Leaseweb UK”) and its business relations. This Privacy Statement informs you of Leaseweb UK’s practices as an IaaS cloud provider for unmanaged services (unless explicitly provided otherwise) 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 is subject to international data protection laws, in particular the EU Data Protection Regulation 2016/679/EU (“GDPR”) and UK General Data Protection Regulation (“UK GDPR”) and UK Data Protection Act 2018 is the UK implementation of the GDPR (“DPA 2018”). 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.
- 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 Processor.
- A Personal 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 promotion run by 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.

In addition, Leaseweb UK may process your Personal Data as received from fraud-prevention agencies, referral partners, business directories and credit reference agencies.

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

Leaseweb UK may process the following information about you:

- Your business contact persons name, address, phone number, email address, business and ID registrations that may include photo and personal identification numbers and such contact details of 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 notes or recordings of any calls you make to Leaseweb UK, chat records when you engage in a chat session with Leaseweb UK, any emails or letters 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 data center or the public space outside and inside our offices.
- Documents and information that certify your identity.

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

Leaseweb UK may process your Personal Data for the following purposes to:

- Processing of Orders, Sales Contracts, contracts and provision of services, which may include customer verification.
- Process of vendors contact details for the procurement of services, and communicating with vendors to provide information about services of Leaseweb UK and affiliated companies.
- Conduct market research, retention and customer satisfaction surveys, (direct) marketing activities (including through email newsletters, social media and onsite/offsite and online/offline advertisement), sales activities including to make (tailormade) offers and quotations and offering promotions.
- Communicate with customers, including to (i) provide information about services of Leaseweb UK and affiliated companies, (ii) provide information about offers, Orders and Sales Contracts, provision of services, order status and payment, (iii) provide support and maintenance services, (iv) handle complaints, and (v) answer questions from (potential) customers.
- Perform financial processes, including to (i) calculate, invoice and collect service fees, (ii) process financial transactions regarding the acceptance of Orders, and (iii) grant debt collection rights to third parties.
- Investigate creditworthiness and perform risk management, including to prevent overextending credit to (potential) customers and verify whether (potential) customers will be able to comply with financial obligations.
- Investigate and process suspected violations of Leaseweb UK’s Policies.
- Ensure the security of persons, goods and objects, and perform fraud detection.
- Conduct legal processes and comply with legal requirements, including in relation to legal proceedings, and evidence gathering processes, and complying with court orders.
- Comply with statutory obligations, including to (i) provide data to authorized authorities in the context of criminal investigations, and (ii) comply 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.
- Establish the identity of customers or third parties, including provide access to data centers and our offices.

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

Leaseweb UK may share your Personal Data with:

- Its affiliate Leaseweb Global B.V. ("Leaseweb Global") as the intercompany shared services provider in its role as a Data Sub-Processor as well as the operator of the Leaseweb website for the purposes of financial, tax, sales, (direct) marketing (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 Personal Data.
- Suppliers (sub-processors) or agents involved in delivering the services 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 Policies or applicable laws (to the extent such sharing is required by law).

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 Personal Data as described above, we rely on the following 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 for information security. We also endeavour to provide you with the best suitable content through our website, emails and newsletters, to improve and promote our products and services, to enhance our administrative functions, fraud detection and legal purposes and for sales and marketing processes with affiliates including Leaseweb Global.
- **Consent:** For marketing advertisement (excluding operational communication as part of the services), 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 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 later moment, this may 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.

ACCESS CONTROL BY DATA CENTERS

Providers of data centers in the UK are not part of the Leaseweb group. Some data centers may require you to use a (personalized) ID badge, other data centers may require you to use biometric access control system to gain unescorted access to the data center.

Customer is aware that a data center is responsible for the physical access and control of its premises as a Data Controller. Each data center is solely responsible for determining and executing its access control policies as indicated in their House Rules, including the processing of such biometric data for its access control system.

TECHNICAL AND ORGANISATIONAL 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, 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.
 - 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.

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- (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
 - ISAE3402 type 2 (SOC1) assurance report

LEASEWEB UK IN ITS ROLE AS UNMANAGED IAAS CLOUD PROVIDER (UNLESS EXPLICITLY PROVIDED OTHERWISE) (DATA PROCESSOR)

Any possible Customer Personal Data that is hosted, transmitted or processed on equipment you own (Co-location) or any possible Customer Personal Data hosted, transmitted or processed by Leaseweb UK in the delivery of the services on your behalf, is governed by this paragraph for Leaseweb as

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Data Processor, and any actions performed by Leaseweb UK in relation to such Personal Data shall be solely governed by the Sales Contract concluded between Leaseweb UK and its customer.

The customer of Leaseweb UK that owns the equipment (Co-location) or uses Leaseweb UK services, determines the purposes and means of the processing of Personal Data and therefore is to be considered the Data Controller in regards to such processing whereby Leaseweb UK has no logical access to such Personal Data.

DATA RESIDENCY

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

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 as the global intercompany shared service provider offers expertise related to (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: legal@leaseweb.com.

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.
- You can request the Personal Data processed of you.
- You also have the right to request 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 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 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, please contact us using the privacy email address 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. In UK, the competent authority for Leaseweb UK Ltd. is Information Commissioner's Office (ICO), located at Wycliffe House Water Lane, Wilmslow, Cheshire, SK9 5AF United Kingdom, website <https://ico.org.uk/>.

STATEMENT CHANGES

Leaseweb UK reserves may change this Privacy Statement, and will post any revisions on the Leaseweb website www.leaseweb.com. Leaseweb UK 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 UK will provide notice of the change by posting the updated Privacy Statement on our website. 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@leaseweb.com.

Leaseweb UK Limited a private limited liability company, incorporated under the laws of England and Wales with its offices at 2 Eastbourne Terrace, London W2 6LG, United Kingdom listed with the Registrar of Companies House under number 10879718.