

November 2024

Your privacy is our priority

DATA PROTECTION INFORMATION

D'leteren

Table of content

1. What is the purpose of this information notice?	3
2. Who is the data controller?	5
3. Which personal data do we process?	7
3.1 Categories of data subjects	8
3.2 Categories of personal data	9
4. How and why do we process your personal data?	11
4.1 To deliver you our products and services	12
A. To provide you with offers and quotes	13
B. To provide you with the requested products and services and manage our contractual relationship	13
C. To provide you with specific online services	14
D. To provide you with delivery/installation services	14
E. To provide you with specific fleet customer services and manage the fleet contractual relationship	14
F. To ensure compliance with legal obligations	14
G. To secure D'Ieteren Automotive premises, assets, tools and events	15
H. To provide optional services to facilitate access to products/services offered by subsidiaries and partners	15
4.2 To promote D'Ieteren Automotive products and services	16
A. To present D'Ieteren Automotive products and services on websites	17
B. To offer you test drive experiences	17
C. To contact customers for lead follow-up or to propose specific advantages or offers	17
D. To address you personalised marketing communications	18
E. To address marketing communications to existing clients about products and services similar to those already purchased	18
F. To develop and improve our marketing strategy	19
G. To inform you about D'Ieteren Automotive activities and products/services through the use of online platforms	19
H. To create new distribution lists/audiences in order to disseminate D'Ieteren Automotive advertising to the most interested people, in particular using social media tools	20
I. To display advertising on third-party media platforms or web sites	20
4.3 To improve customer experience and optimise our operational efficiency	21
A. To organise our network	21
B. To collect feedback through satisfaction surveys	21
C. To carry out market research to properly design or improve our products and services	22
D. To perform quality control on delivered products/services	22
E. To define and improve customer loyalty program	23
F. To interact with you and answer your requests/claims	23
G. To protect our interest and manage disputes	23
5. With whom do we share your data?	24
A. D'Ieteren Automotive subsidiaries	25
B. D'Ieteren Automotive processors	25
C. Public authorities	26
D. D'Ieteren Automotive partners	26
6. Where are your data located?	27
7. How long do we keep your data?	29
8. How do we protect your data?	31
9. What are your rights and how can you exercise them?	32
How to Contact us?	35
Modifications to this information notice	35



1

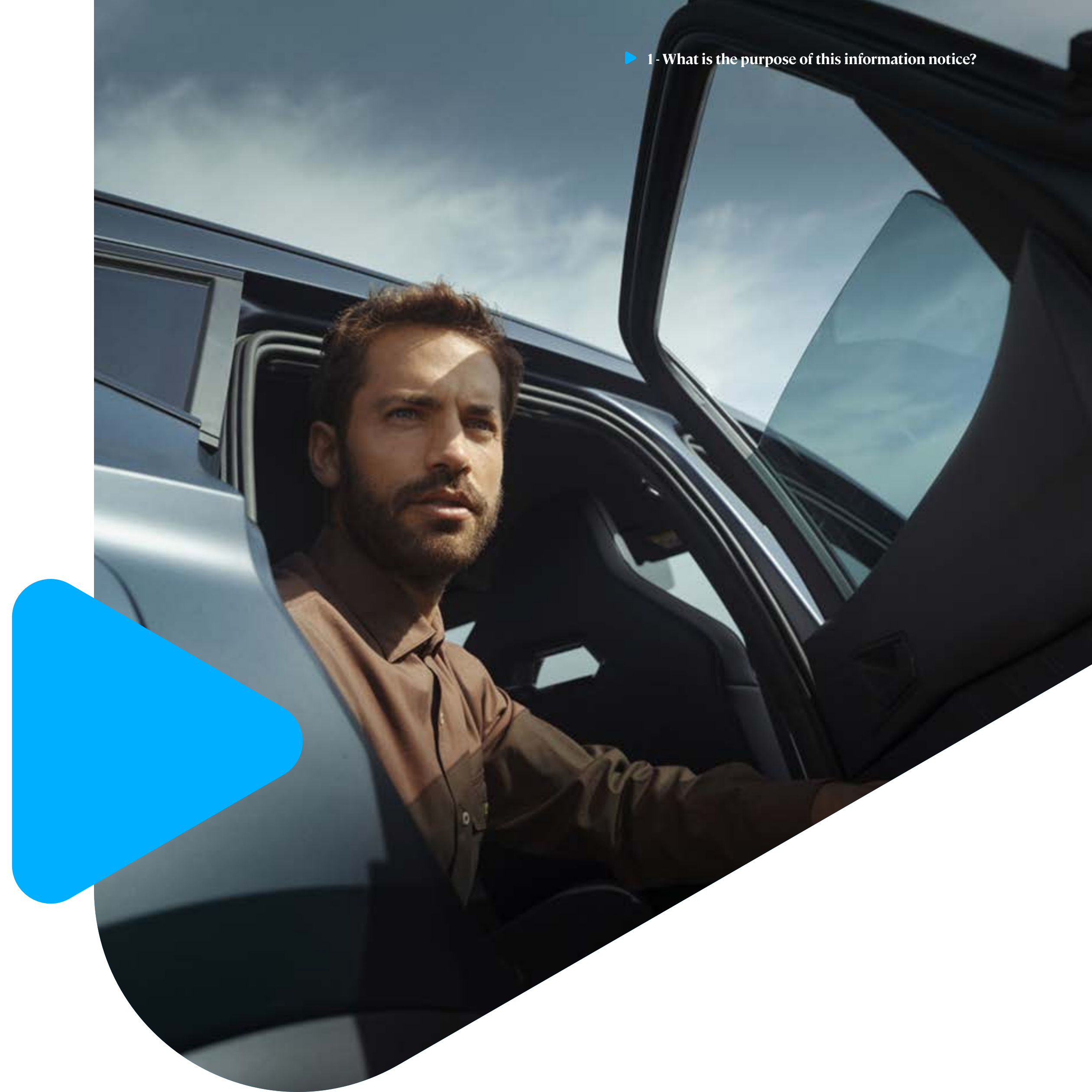
**What is the
purpose of
this information
notice?**

The aim of this information notice is to provide you with clear and comprehensive information about the processing of your personal data by D'leteren Automotive SA/NV (hereinafter "D'leteren Automotive", or "we").

We process your personal data in accordance with the General Data Protection Regulation 2016/679 of 27 April 2016 (hereinafter "GDPR") and the Belgian law of 30 July 2018 on the protection of individuals with regard to the processing of personal data (hereinafter "Privacy law").

To provide you with an easy access to the relevant information, this information notice is structured in different sections:

- ▶ [Who is the data controller?](#) (2.)
- ▶ [Which personal data do we process?](#) (3.)
- ▶ [How and why do we process your personal data?](#) (4.) In this section, we are providing you with a comprehensive overview of the main processing activities grouped under three main purposes:
 - [to provide you mobility related products and services](#) (4.1.),
 - [to promote D'leteren Automotive offer of products and services](#) (4.2), and
 - [to improve your experience of customer of mobility products and services and to optimise D'leteren Automotive operational efficiency](#) (4.3).
- ▶ In the next sections, you can access additional information relating to specific topics: [the sharing of data with third-parties](#) (5.), [the location of your data](#) (6.), [the duration of the processing activities](#) (7.), [the security of data](#) (8.), [a reminder of your rights and how to exercise them](#) (9.), [how to contact D'leteren Automotive in relation with the processing of your personal data.](#)



2

Who is the data controller?

D'leteren Automotive SA/NV, head-quartered at Rue du Mail, 50, 1050 Brussels, is a Belgian company which imports and distributes vehicles, spare parts, accessories, bikes and additional automotive and mobility services like charging and solar panels solutions, repair activities – across Belgium and France for Microlino vehicles. D'leteren Automotive imports and distributes the VW AG (Volkswagen, Volkswagen Commercial Vehicles, Audi, SEAT, Cupra, ŠKODA, Porsche) and Microlino vehicles, and distributes Maserati, Bentley, Lamborghini, Bugatti, and Rimac vehicles.

The mission of D'leteren Automotive is to provide our customers with seamless and sustainable mobility for everyone. At D'leteren Automotive, a vehicle is not just one product: it is a collection of connected services enhancing your lifestyle. D'leteren Automotive has pioneered the development of new mobility services, like shared and multi-mode mobility services such as Poppy, Taxis Verts, Husk.

D'leteren owns several subsidiaries, and more specifically:

- D'leteren Mobility Company (DMC) – D'leteren Automotive Retailer;
- My Way en Audi Approved Plus (used cars);
- Wondergroup (car maintenance franchise WonderServices and body part repair Wondercar);
- Electric by D'leteren (charging stations for electric vehicles);
- GoSolar (solar panels and batteries);
- Lucien Bike (bike retailer);
- Joule (bike financing services);
- D'leteren Micromobility (urban micro vehicles);
- Lab Box (operating Husk (private driver transport solutions), Mob box (mobility consulting) and mBrella (HR mobility services));
- Poppy (car sharing services);
- Taxis Verts (hub for taxi services);

To offer you its various mobility related services, D'leteren Automotive processes your personal data.

By “processing”, we mean every operation we carry out on data, such as collecting, saving, storing, consulting, using, sending, deleting, archiving, and destroying data.

D'leteren Automotive is to be considered as the data controller where it determines the purpose for which the data are processed and how they are processed. In such a case, the present Privacy information notice shall be used to inform the data subjects whose data are processed by D'leteren Automotive.

In case D'leteren Automotive is deciding together with other entities, all deciding entities are considered as joint controllers, in accordance with GDPR. Where appropriate, the present information notice shall contain specific additional information regarding joint controllership situations.

3

Which personal data do we process?

In the course of its activities, D'leteren Automotive interacts with several categories of natural persons (hereinafter ["data subjects"](#)) (3.1.) and needs to process [specific types of personal data](#) (3.2.).

3.1 Categories of data subjects

As part of its activities, D'leteren Automotive is processing personal data relating to different categories of data subjects. To ensure that you can easily determine whether you are concerned by a processing activity carried out by D'leteren Automotive, the table below provides for further details on the categories of data subjects whose personal data are processed.

▶ Customers

Individuals (private or self-employed professionals) who are in a contractual relationship with D'leteren Automotive and its dealers/distributors network for the supply of goods (e.g. vehicle) and/or services (e.g. vehicle maintenance).

▶ Company representatives

Individuals who are the contact persons or representatives of companies which are in a contractual relationship with D'leteren Automotive and its dealers/distributors network for the supply of goods (e.g. vehicle) and/or services (e.g. vehicle maintenance) for their employees and/or other individuals working for them (e.g. directors, agents) (referred to as "drivers/users" in this information notice).

▶ Prospects

Individuals (acting for private purposes, company representatives, drivers/users, or self-employed professionals) who show any interest in D'leteren Automotive's products, services and/or activities and who are not (yet) in a contractual relationship with D'leteren Automotive (e.g. individuals requesting to receive marketing communications from D'leteren Automotive, requesting a test drive, or requesting an offer).

▶ Drivers/users

Employees and other individuals (e.g. directors, agents) who are not directly in a contractual relationship with D'leteren Automotive or its dealers/distributors network, but who are offered goods (e.g. vehicle) and/or services (e.g. vehicle maintenance) supplied by D'leteren Automotive under a contract concluded with the company/organisation for which they are working, or under a contract concluded with a customer for his/her benefit.

▶ Internet users

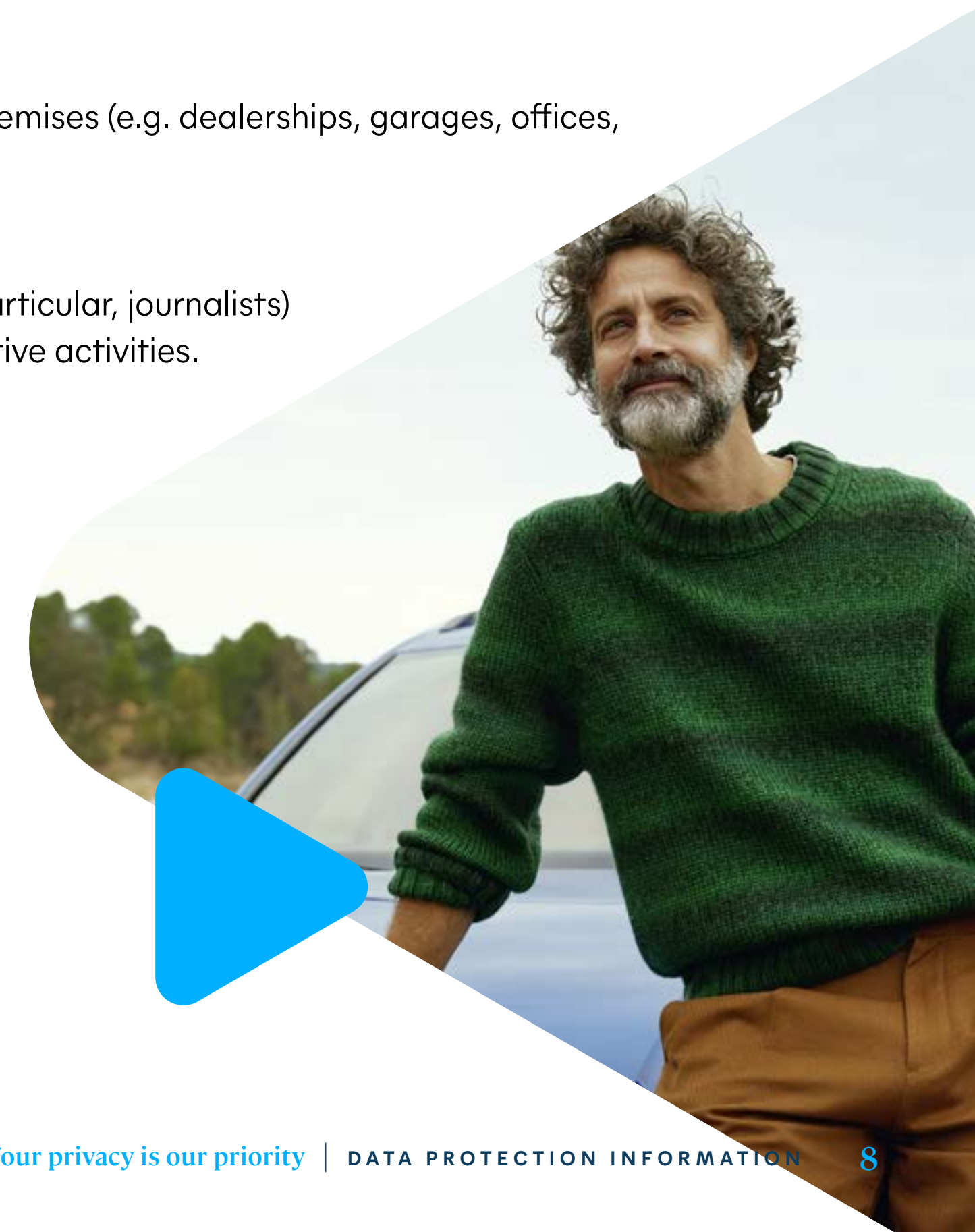
Visitors of D'leteren Automotive's websites, social media pages and/or other online services provided by D'leteren Automotive.

▶ Visitors

Individuals visiting D'leteren Automotive premises (e.g. dealerships, garages, offices, event venues).

▶ Press & media

Individuals working for press & media (in particular, journalists) and people interested in D'leteren Automotive activities.



3.2 Categories of personal data

To develop its activities, D'leteren Automotive is processing various categories of personal data. For the sake of transparency, you can find below further details on the categories of processed personal data. Please note that the list below is not supposed to be exhaustive, but rather to provide you with clear information about the main categories of usually processed personal data. When the information notice refers to specific categories of personal data, it has to be understood in accordance with the details provided in the table below. In accordance with the data minimisation principle of GDPR, D'leteren Automotive carefully and regularly assesses the need to process personal data in light of the achieved purposes.

▶ Identification data

Name, surname, gender, language, date and place of birth, nationality.

▶ Contact information

Address, email, phone, mobile, online service login, communication network account, contact preferences.

▶ Identity evidence

Extract of ID card data (name, surname, address), copy of ID card and/or national number (where legally required).

▶ Driving license data

Copy of driving license or of data contained on the driving license.

▶ Professional data

Company, position, (company) VAT number.

▶ Financial data

Bank account number, credit card references, payment details, payment history, invoices, accounting information.

▶ Access data

Information collected for granting access to D'leteren Automotive premises, to event venue or to any buildings/facilities used for D'leteren Automotive activities.

▶ Family data

Household composition, number of (dependent) children (insofar as family data are necessary to benefit advantages subject to specific family status).

▶ Contract data

Purchased products/services, date of contract, specific contract requirements (date of delivery, specific configuration, ancillary services...), credit/leasing/renting request status and follow-up information, performance status, maintenance status and history, selected dealer/distributor/partner, power supply information, identification of D'leteren Automotive/factories/suppliers/dealers/distributors/partners staff in charge of the provided services... (actually processed data shall vary depending on the nature of the provided products/services).

▶ Booking data

Appointment information (date, place), selected dealer/distributors/partner, selected product/service, specific requests.

▶ Individual request data

Any information you provided to D'leteren Automotive (by phone, email, chat, to a dealer/distributor staff, etc.) to raise question, request offer, request support, or asking for contract follow-up. This may also include call/chat recordings.

▶ IT data

IP address, user login, login times, other relevant logs (Itsme logs for instance), cookie identifiers/files and other identifiers/files used to track browsing behaviour.

▶ **Internet interaction data**

Statistical data relating to your interaction with D'leteren Automotive's accounts on social media or interactions with D'leteren Automotive's websites.

▶ **Preferences information**

Information about your communication preferences (marketing communication options, consent status...), information about your preferences regarding our products and services (preferred brands...).

▶ **Event data**

Information about an event (location, type of activity, success indicators, attendee list, results of contest...), depending on the nature of each event.

▶ **Satisfaction indicators**

Overall scores of satisfaction surveys, responses to surveys (except anonymous surveys).

▶ **Vehicle data**

Brand, model, design, technical characteristics, maintenance data, mechanical intervention data, license plate number, vehicle identification number (VIN), homologation data, pollution data...

▶ **Product/service data**

Characteristics of the products/services, accessories, components data, specific data which may be required depending on the nature of the provided products/services (e.g. power network configuration to install a charging station for electric vehicle).

▶ **Vehicle/product generated data**

Data generated by the use of the vehicle/products, depending on the configuration of each vehicle/product and the recorded preferences of the driver/user.

In general, D'leteren Automotive does not have access to vehicle/product generated data, except mileage data, actual fuel consumption data and technical and security alerts data.

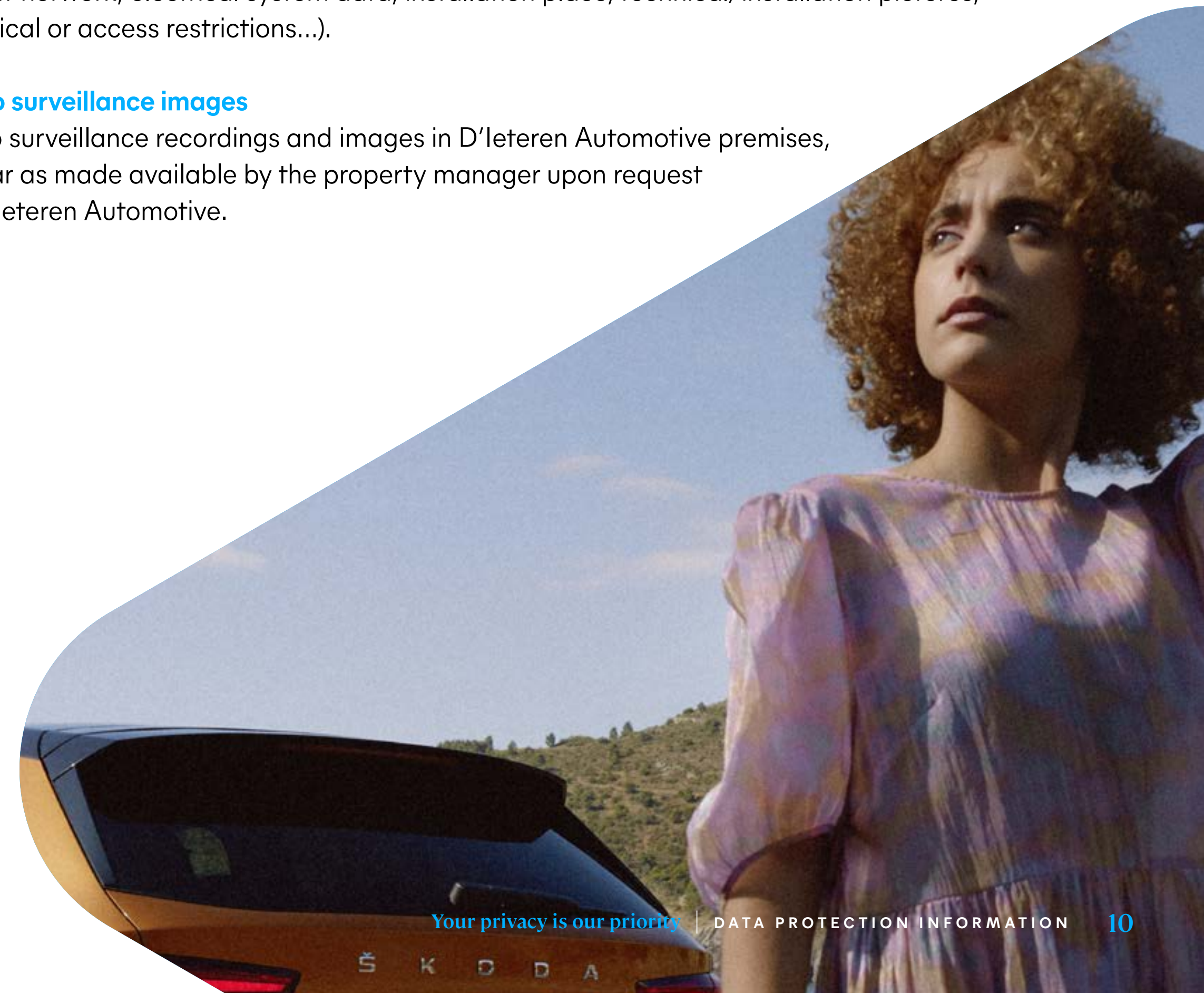
For specific services, additional and specific vehicle/product generated data may be processed by D'leteren Automotive, like geolocation data for test-drive or car-sharing services. Where appropriate, specific additional information is provided about related data processing.

▶ **Building information**

For specific services, information about the characteristics of your building are necessary (power network, electrical system data, installation place, technical/installation pictures, technical or access restrictions...).

▶ **Video surveillance images**

Video surveillance recordings and images in D'leteren Automotive premises, insofar as made available by the property manager upon request by D'leteren Automotive.



A woman with dark hair is driving a car. She is wearing a light-colored top and green pants. The car's interior is visible, including the steering wheel, dashboard, and center console. The dashboard features a digital display showing navigation information, including a map and the text "Over the world The destinies My Way". The steering wheel has a logo in the center. The overall scene is dimly lit, suggesting an evening or night setting.

4

How and why do we process your personal data?

D'leteren Automotive is processing personal data for several purposes, and mainly for [providing you mobility related products and services \(4.1\)](#), [promoting D'leteren Automotive offer of products and services \(4.2\)](#), and to develop specific initiatives dedicated to [improving your experience of customer of mobility products and services and our operational efficiency \(4.3\)](#). You can find further details on these personal data processing activities in the tables and sections below.

In accordance with the GDPR, the following information are detailed below:

▶ **Purpose**

Describes for which goal your data are processed by D'leteren Automotive;

▶ **Legal basis**

Describes the applicable legal justification for the processing of your data, in accordance with article 6 of the GDPR;

▶ **Categories of data subjects**

Indicates to which type(s) of natural persons the data processed by D'leteren Automotive relate (further details on the referred categories are available in [section 3.1](#)).

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▶ **Categories of data**

Describes which types of personal data are processed by D'leteren Automotive. Generic naming are used for the sake of clarity (further details on the referred categories are available in [section 3.2](#)); the categories of personal data are listed based on the usual D'leteren Automotive business standards, without being exhaustive;

▶ **Joint Controllers**

Specific processing activities are carried out in collaboration with other data controllers, deciding together with D'leteren Automotive on the purposes and means of the processing. In accordance with article 26 of the GDPR, specific additional information is provided where appropriate.



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4.1 To deliver you our products and services

D'leteren Automotive is committed to provide you with the highest quality of products and services, which requires to process your personal data for the following more specific purposes:

A - To provide you with offers and quotes

▶ Purpose

To issue offers and quotes when requested by you, and to ensure the follow-up by the dealers/distributors and sales staff.

▶ Legal Basis

The processing is necessary for D'leteren Automotive to provide you the requested services (article 6.1.b GDPR) or necessary for the legitimate interests of D'leteren Automotive in ensuring an efficient follow-up of your requests (Article 6.1.f GDPR).

▶ Categories of data subjects

Prospects, customers, company representatives, drivers/users.

▶ Categories of data

Identification data, contact information, professional data, financial data, contract data, vehicle data, product/service data, identity evidence (where required).

B - To provide you with the requested products and services and manage our contractual relationship

▶ Purpose

To order, deliver and ensure the proper use of the requested products/services (including follow-up with the factories and network, and warranty/recalls), and to invoice such products/services (including debt collection).

▶ Legal Basis

The processing is necessary for D'leteren Automotive to perform its contract with you (article 6.1.b GDPR) or necessary for the legitimate interests of D'leteren Automotive in ensuring an efficient follow-up of your requests and/or in ensuring the proper performance of the contract with your employer (Article 6.1.f GDPR).

▶ Categories of data subjects

Customers, company representatives, drivers/users, prospects.

▶ Categories of data

Identification data, identity evidence, contact information, contract data, financial data, product/service data, vehicle data, vehicle/product generated data (in specific cases), professional data, IT data.

Specific categories of data may be processed, depending on the nature of the provided services, like for instance:

- geolocation data for road assistance request;
- driving license data for car sharing or replacement car provision;
- insurance data in case of service request supported by an insurance contract.

C - To provide you with specific online services

▶ Purpose

To provide you with specific online services and to handle the specific online requests made on our websites (e.g. to make appointments online, to purchase products or services via online platforms).

▶ Legal Basis

The processing is necessary for D'leteren Automotive to perform its contract with you (article 6.1.b GDPR), or necessary for the legitimate interests of D'leteren Automotive in ensuring an efficient follow-up of your requests and/or in ensuring the proper performance of the contract with your employer/company (Article 6.1.f GDPR).

▶ Categories of data subjects

Customer, company representatives, drivers/users, prospects.

▶ Categories of data

Information data, contact data, professional data, vehicle data, product/service data, financial data, identity evidence, IT data.

D - To provide you with delivery/installation services

▶ Purpose

To provide you with at home/on premises services and/or installation services (e.g. charging station installation) including at home preliminary analysis before installation, support to activation and certification of the installation...

▶ Legal Basis

The processing is necessary for D'leteren Automotive to perform its contract with you (article 6.1.b

GDPR) or necessary for the legitimate interests of D'leteren Automotive in ensuring an efficient follow-up of your requests and/or in ensuring the proper performance of the contract with your employer/company (Article 6.1.f GDPR).

▶ Categories of data subjects

Customers, drivers/users, company representatives.

▶ Categories of data

Identification data, identity evidence, contact information, contract data, product/service data, professional data, vehicle related data, booking data, building data, financial data, IT data.

E - To provide you with specific fleet customer services and manage the fleet contractual relationship

▶ Purpose

To provide you with specific fleet customer services (charging card e.g.), and services to drivers/users (maintenance tracking, e.g.).

▶ Legal Basis

The processing is necessary for D'leteren Automotive to perform its contract with you (article 6.1.b GDPR) or necessary for the legitimate interests of D'leteren Automotive to provide high quality services to its fleet customers and the related drivers/users (article 6.1.f GDPR).

▶ Categories of data subjects

Customers, company representatives, drivers/users.

▶ Categories of data

Identification data, identity evidence, contact information, professional data, vehicle/product generated data, vehicle data, product/service data, IT data.

F - To ensure compliance with legal obligations

▶ Purpose

To comply with legal obligations - including data protection, accounting, tax, car pass legislation, pollution regulation, automotive vehicles homologation, traffic regulation, recall process (safety issues), and to prevent fraud to such legal obligations by third-parties (including customers).

▶ Legal Basis

The processing is required for D'leteren Automotive to comply with its legal obligations (article 6.1.c GDPR).

The processing is also necessary for the legitimate interests of D'leteren Automotive to secure its data and assets, and for the legitimate interest of the D'leteren Automotive staff, suppliers' staff, partners' staff, customers, and the public in general to prevent fraud or circumvention to legal obligations (article 6.1.f GDPR).

▶ Categories of data subjects

Any data subject whose personal data are processed by D'leteren Automotive, irrespective of its status (prospects, customers, company representatives, drivers/users, internet users, visitors, etc.).

▶ Categories of data

Identification data, identity evidence, contact information, driving license data, individual request data, contract data, vehicle data, financial data, IT data, product/service data (insofar as required to meet applicable legal obligations and retain evidence of compliance, in the event of a dispute or suspected fraud).

G - To secure D'leteren Automotive premises, assets, tools and events

▶ Purpose

To ensure the security of our premises, infrastructure, IT infrastructures and tools, offices, warehouse or more generally any of our buildings and/or events (including fraud prevention).

▶ Legal Basis

The processing is necessary for the legitimate interests of D'leteren Automotive to secure its premises, tools and assets, and to achieve the legitimate interest of the D'leteren Automotive staff, suppliers' staff and visitors/customers/prospects to be safe when present at D'leteren Automotive premises or when using D'leteren Automotive tools (article 6.1.f GDPR). Where relevant, the use of cameras is indicated by the regulatory pictogram displayed within the relevant premises.

▶ Categories of data subjects

Visitors, customers, drivers/users, company representatives, prospects.

▶ Categories of data

Identification data, identity evidence, professional data, access data, IT data, video surveillance recordings (insofar as made available by the property manager upon request).

H - To provide optional services to facilitate access to products/services offered by subsidiaries and partners

▶ Purpose

To provide you with additional services aiming at facilitating the access to the services offered by D'leteren Automotive subsidiaries or D'leteren Automotive partners, such as credit, finance, leasing, insurance and mobility related services. This processing activity is only performed upon your request.

▶ Legal Basis

The processing is necessary for D'leteren Automotive to perform its contract with you to provide you with the requested optional services (article 6.1.b GDPR).

▶ Categories of data subjects

Customers, company representatives, drivers/users, prospects.

▶ Categories of data

Identification data, identity evidence and IT data (where required), contact information, contract data, financial data, product/service data, professional data, vehicle related data.

4.2 To promote D'leteren Automotive products and services

D'leteren Automotive is processing your data with your prior authorisation to address you personalised marketing communications about its products and services, your loyalty benefits (e.g. presents, vouchers, discounts), exclusive advantages, discounts, as well as invitations to events and special activities (contests, exhibitions, sports events...).

In order to meet your expectations, we select the communications on the basis of your customer history and any preferences you may have indicated (e.g. the brand of your vehicles). We can analyse the data at our disposal to try to better anticipate your needs and expectations. By cross-referencing or supplementing this data by ourselves or by one of our subcontractors, we can also establish a profile in order to ensure a better match with your wishes. This way, we can send you communications tailored to you and your preferences regarding our products and services.

For example, we may send you our newsletter or invitations to events about new models of vehicles, products or accessories that you previously purchased or for which you indicated your interest.

Additionally, in order to enhance your customer experience, we may also send you information about services related to your purchased products or services (e.g. season-based tires, winter check, preventive maintenance, etc.).

The consent you give us to process your data for marketing purposes can be withdrawn at any time, for example via the unsubscribe links at the bottom of all promotional emails.

Furthermore, you can request us to adapt the settings of your marketing communication preferences such as changing your consent status, adding or removing your consent for specific areas of marketing, specifying your preferred topics and communication channels. You can do that just by contacting us using the contact details as mentioned in the section ['How to contact us?'](#) or by using the consent management tool which may be available to allow you to better fine-tune your preferences regarding your interactions with us.

Finally, dedicated marketing channels may be organised for specific ranges of products/services (luxury vehicles, e.g.), or towards specific categories of customers (fleet managers, e.g.). In such a case, by default, the marketing communications shall be limited to that specific type of products/services, except if you indicate your preferences to be extended to other categories of products/services. More information on the scope of these specific channels is available on the relevant information medium (dedicated web site, in particular).

Apart from communications based on your consent, specific marketing campaigns may be organised based on D'leteren Automotive legitimate interest to promote products and services similar to the ones you previously purchased/used.

Your data may also be processed by D'leteren Automotive on the basis of its legitimate interest in creating new audiences. In this case, we do not send you any commercial communication but simply use your data to find new prospects who are sharing similar interests/preferences to yours and could therefore be potentially interested in our products and services.

To improve its marketing strategy and better meet your expectations, D'leteren Automotive assesses your feedback about its marketing actions and the evolution of customer preferences. To do so, where possible, we are using anonymized data or pseudonymised data.

In any event, you may object to such use of your personal data at any time by contacting us using the contact details as mentioned in the section ['How to contact us?'](#) or by using the objection link at the bottom of all our promotional emails.

A - To present D'leteren Automotive products and services on websites

You can visit our websites and find out about our services without having to provide us with any personal information. However, the use of certain cookies is necessary to browse our websites. For further information in this respect, please refer to the Cookie Policy available on the website you are visiting.

B - To offer you test drive experiences

▶ Purpose

To offer you test drive experiences, and to organise the test drive management within the network (including availability of the vehicles and the follow-up of fines received from the authorities for customers/prospects/drivers/users who have committed traffic offences with D'leteren Automotive vehicles).

▶ Legal Basis

The processing is necessary for D'leteren Automotive to perform its contract with you (article 6.1.b GDPR) and is necessary to comply with legal obligations (article 6.1.c GDPR).

▶ Categories of data subjects

Customers, prospects, drivers/users, company representatives.

▶ Categories of data

Identification data, identity evidence, IT data, contact information, vehicle/product generated data, vehicle data, booking data, dealer data, and driving license data.

C - To contact customers for lead follow-up or to propose specific advantages or offers

▶ Purpose

To contact customers by phone to offer specific benefits or advantages, in particular in relation with similar products/services as previously purchased.

▶ Legal Basis

The processing is necessary for the legitimate interests of D'leteren Automotive in promoting its products and services and ensuring sales processes are properly completed (article 6.1.f GDPR).

You may object to such use of your personal data at any time, using the various contact points as mentioned in the section '[How to contact us?](#)', or by registering your phone number on the "do not call me" list (for further details, refer to <https://www.dncm.be>)

▶ Categories of data subjects

Customers, company representatives, drivers/users, prospects.

▶ Categories of data

Identification data, contact information, preferences information, vehicle data, product/service data.



D - To address you personalised marketing communications

▶ Purpose

To address you personalised marketing communications about our products and services, your loyalty benefits (e.g. presents, vouchers, discounts), exclusive advantages, discounts, as well as invitation to events and special activities (contests, exhibition, sports events...).

▶ Legal Basis

The processing is based on your consent (article 6.1.a GDPR).

▶ Categories of data subjects

Prospects, customers, company representatives, drivers/users, internet users, press & media.

▶ Categories of data

Identification data, contact information, professional data, contract data, IT data, vehicle data, vehicle-generated data, family data, satisfaction indicators, product/service data, preferences information, booking data, photos, event data (including results where appropriate).

▶ Joint Controllers

Specific marketing campaigns, activities or events, especially when relating to a specific brand, may be jointly organised with factories, independent dealers/distributors or other D'leteren Automotive partners (e.g. D'leteren Lease or Volkswagen D'leteren Finance). Where relevant, specific additional information is provided in the privacy notice on the brand websites, or the websites dedicated to the relevant action/event.

We may also use third-party partners to better understand our customers' preferences and improve our communications. When these partners are involved in the determining of the targeting strategy, they also act as joint controllers.

E - To address marketing communications to existing clients about products and services similar to those already purchased

▶ Purpose

To address you marketing communications (including invitation to events) about the products and services similar to the ones you previously purchased.

▶ Legal Basis

These specific marketing campaigns are based on the legitimate interest of D'leteren Automotive to promote similar products and services towards existing customers (article 6.1.f GDPR).

You may object to such use of your personal data at any time, using the links included in our communications or using the various contact points as mentioned in the section '[How to contact us?](#)'.

▶ Categories of data subjects

Customers, company representatives, drivers/users.

▶ Categories of data

Identification data, contact information, professional data, contract data, IT data, vehicle data, vehicle-generated data, family data, satisfaction indicators, product/service data, preferences information, booking data, photos, event data (including results where appropriate).

▶ Joint Controllers

Some marketing campaigns, activities or events, especially when relating to a specific brand, may be jointly organised with factories, independent dealers/distributors or other D'leteren Automotive partners (e.g. D'leteren Lease or Volkswagen D'leteren Finance). Where relevant, specific additional information is provided in the privacy notice on the brand websites or the websites dedicated to the relevant action/event.

F - To develop and improve our marketing strategy

▶ Purpose

To define and improve D'leteren Automotive marketing strategy.

For that purpose, D'leteren Automotive may assess the customer appraisal of the conducted marketing actions. However, to minimise the use of personal data, D'leteren Automotive favours the use of anonymised or pseudonymised data to achieve that purpose.

▶ Legal Basis

The processing is necessary for the legitimate interests of D'leteren Automotive in promoting its products and services (article 6.1.f GDPR).

▶ Categories of data subjects

Prospects, customers, company representatives, drivers/users, press & media.

▶ Categories of data

Identification data, contact information, professional data, contract data, IT data, vehicle data, vehicle-generated data, family data, satisfaction indicators, product/service data, preferences information, internet interaction data, booking data, photos, event data (including results where appropriate).

▶ Joint Controllers

Some marketing campaigns, activities or events, especially when relating to a specific brand, may be jointly organised with factories, independent dealers/distributors or other D'leteren Automotive Partners. Where relevant, specific additional information is provided in the privacy notice on the brand websites, or the websites dedicated to the relevant action/event.

G - To inform you about D'leteren Automotive activities and products/services through the use of online platforms

D'leteren Automotive manages its Internet and social presence to inform the public about its activities through dedicated pages, posts and advertising. By doing so, the documents relating to the processing of personal data by pre-existing platforms (Facebook, Instagram, X (Twitter), LinkedIn) shall apply.

D'leteren Automotive has however no influence on the documents or on the data processing carried out by these platforms, especially regarding the processing for the improvement of their advertising system and to collect statistics of audience of the visited pages.

However, it is possible that we may be qualified as joint controllers with these platforms. In this case, the data that you communicate to us by visiting our pages on these platforms is or may be processed jointly by the social network and D'leteren Automotive as the administrator of its social network pages for the following purposes:

- the collection of certain data by means of cookies;
- improvement by the social network of its advertising system;
- obtaining audience statistics for the page.

This data will only be processed by the page administrator (D'leteren Automotive) as part of its legitimate interest in informing the public about its activities and to obtain statistics to adequately promote its social network pages (article 6.1.f GDPR). The audience statistics established by the social networks are only transmitted to D'leteren Automotive acting as the administrator of the page and in an anonymized form.

The personal data concerned may be data linked to your account, data linked to the sharing of content or to your communications with other people using the same platform.

This personal data is or may be processed for as long as the page exists and you visit it. The privacy notices of each social network used by D'leteren Automotive can be found by clicking on the following links:

[Facebook & Instagram \(Meta\)](#)

[X \(Twitter\)](#)

[LinkedIn](#)

H – To create new distribution lists/audiences in order to disseminate D’leteren Automotive advertising to the most interested people, in particular using social media tools

▶ Purpose

D’leteren Automotive processes your data jointly with social networks and media partners to display advertisements for its products and services on your feed.

Also, some social networks, such as Facebook, offer a service that allows us to create a new group of recipients based on a reference group sharing similar interest topics, to whom an advertising can then be displayed.

This process may involve communicating your personal data (e-mail address in hashed form) to the social network and media partners.

▶ Legal Basis

The processing is necessary for the legitimate interests of D’leteren Automotive in efficiently promoting its products and services through the use of popular social media tools (article 6.1.f GDPR).

▶ Categories of data subjects

Prospects, customers, drivers/users, social network’s users who belong to reference groups sharing D’leteren Automotive customers’ interests.

▶ Categories of data

Identification data (name, surname), contact information (email, phone number), IT data, internet interaction data (mobile ID, Facebook App User ID, Facebook Page User ID).

▶ Joint Controllers

D’leteren Automotive and the social media network are jointly responsible for the processing linked to the creation of the audience and the display of the advertising on the social media. The privacy notices of each social network used by D’leteren Automotive can be found by clicking on the following links:

[Facebook & Instagram \(Meta\)](#)

I – To display advertising on third-party media platforms or web sites

▶ Purpose

D’leteren Automotive processes your data jointly with the owners of other websites or social media networks to display advertisements for D’leteren Automotive products and services on the partners’ website.

To do this, D’leteren Automotive uses data clean room services. These are secure environments that enable to identify media inventories (websites, apps, video platforms,..) on which D’leteren Automotive can display its advertising to potentially interested audience and to actually display the ad, without sharing any of your data in clear with the media partner or the social media network.

▶ Legal Basis

The processing is necessary for the legitimate interests of D’leteren Automotive in efficiently promoting its products and services through key media platforms (article 6.1.f GDPR).

To ensure that such processing does not exceed your legitimate expectations, we only use your data for this purpose if you have expressly agreed to the use of such data for marketing purposes.

▶ Categories of data subjects

Prospects, customers, company representatives, drivers/users, internet users.

▶ Categories of data

Identification data, contact information, IT data, internet interaction data.

▶ Joint Controllers

D’leteren Automotive and the third-party media partner are jointly responsible for the processing linked to the display of the advertising on the third-party media platform/web site.

4.3 To improve customer experience and optimise our operational efficiency

A - To organise our network

▶ Purpose

To organise our network of dealers/distributors and the support services for dealers/distributors (for instance, by ensuring efficient business process to address customer requests, by providing support and training to the network based on customer satisfaction surveys, by organising dealer/distributor reward programme based on customer satisfaction, to support network strategy definition...).

▶ Legal Basis

The processing is necessary for D'leteren Automotive to perform its contract with you (article 6.1.b GDPR), or necessary for the legitimate interests of D'leteren Automotive in ensuring an efficient performance of its contract with your employer/company, and the legitimate interests of D'leteren Automotive to properly organise its network of dealers/distributors to the benefit of all D'leteren Automotive customers enjoying quality services (Article 6.1.f GDPR).

▶ Categories of data subjects

Customers, company representatives, drivers/users, prospects.

▶ Categories of data

Identification data, contact information, contract data, booking data, financial data, product/service data, professional data, vehicle data, product/service data, satisfaction indicators.

B - To collect feedback through satisfaction surveys

▶ Purpose

To improve the quality of our products and services by assessing your satisfaction and/or expectations through surveys. Specific surveys may be conducted by phone.

▶ Legal Basis

The processing is necessary for the legitimate interests of D'leteren Automotive in improving the quality of D'leteren Automotive products and services (by better understanding the needs and expectations of its customers and prospects - article 6.1.f GDPR).

You may object to such use of your personal data at any time, using the links included in our communications or using the various contact points as mentioned in the section "[How to contact us?](#)". For surveys conducted by phone, you may also object by registering your phone number on the "do not call me" list (for further details, refer to <https://www.dncm.be>)

▶ Categories of data subjects

Customer, company representatives, drivers/users, prospects.

▶ Categories of data

Identification data, contact information, professional data, product/service data, and, if you respond to the survey and that you mark your responses to the survey as "not anonymised", additional data may be processed (to ensure your appraisal shall be linked to the services you received), like satisfaction indicators, contract data.

▶ Joint Controllers

As regards products and services relating to specific brands as indicated in the relevant brand websites, your data may be processed jointly by D'leteren Automotive and the relevant factory. Where relevant, specific additional information is provided on the brand websites.

C - To carry out market research to properly design or improve our products and services

▶ Purpose

To enable us to offer properly our products and services, improve the quality of our products and services, and better tailor our new products/services to the customer needs by carrying out market research. As far as possible, to minimise the use of personal data, D'leteren Automotive favours the use of anonymised or pseudonymised data to achieve that purpose.

▶ Legal Basis

The processing is necessary for the legitimate interests of D'leteren Automotive in improving the quality of its products and services and to properly design new products/services (article 6.1.f GDPR).

You may object to such use of your personal data at any time, using the links included in our communications or using the various contact points as mentioned in the section "[How to contact us?](#)".

▶ Categories of data subjects

Customers, company representatives, drivers/users, prospects.

▶ Categories of data

Identification, contact information, professional data, vehicle data, contract data, product/service data, satisfaction indicators.

▶ Joint Controllers

As regards products and services relating to specific brands as indicated in the relevant brand websites, your data may be processed jointly by D'leteren Automotive and the relevant factory. Where relevant, specific additional information is provided on the brand websites.

D - To perform quality control on delivered products/services

▶ Purpose

To ensure product/service quality control, to ensure the follow-up of maintenance alerts, to assess the quality of provided aftersales services and bodywork services.

To monitor and improve the quality of services provided by D'leteren Automotive (including services provided via call centers). As far as possible, anonymised or pseudonymised data are processed for the improvement of tools and interfaces used to interact with customer.

▶ Legal Basis

The processing is necessary for D'leteren Automotive to perform its contract with you (article 6.1.b GDPR) or necessary for the legitimate interests of D'leteren Automotive to control and improve the quality of the provided products/services (article 6.1.f GDPR).

▶ Categories of data subjects

Customers, company representatives, drivers/users, prospects.

▶ Categories of data

Identification data, contact information, individual request data, vehicle data, product/service data, vehicle/product generated data, professional data, satisfaction indicators.

▶ Joint Controllers

As regards products and services relating to specific brands as indicated in the relevant brand websites, your data may be processed jointly by D'leteren Automotive and the relevant factory. Where relevant, specific additional information is provided on the brand websites.

E - To define and improve customer loyalty programs

▶ Purpose

To define and improve customer loyalty programs, offering customers loyalty benefits (e.g. presents, vouchers, discounts) or exclusive advantages, and keep evidence of customers' eligibility to such benefits (where applicable).

▶ Legal Basis

The processing is necessary for the legitimate interests of D'leteren Automotive to reward its customers in order to increase their loyalty to D'leteren Automotive services (Article 6.1.f of GDPR). You may object to such use of your personal data at any time, using the various contact points as mentioned in the section "[How to contact us?](#)".

▶ Categories of data subjects

Customers, company representatives, drivers/users.

▶ Categories of data

Identification data, contact information, professional data, contract data, financial data, IT data, vehicle data, vehicle/product generated data, family data, preferences information. Identity evidence may be required for specific loyalty programs.

F - To interact with you and answer your requests/claims

▶ Purpose

To interact with you (through a chatbot, a live chat, by email, by phone...) and to answer your requests/claims about our products/services.

▶ Legal Basis

The processing is necessary for D'leteren Automotive to perform its contract with you (article 6.1.b GDPR) or necessary for D'leteren Automotive legitimate interests in improving its customers' satisfaction (article 6.1.f GDPR).

▶ Categories of data subjects

Internet users, customers, company representatives, drivers/users, prospects.

▶ Categories of data

Identification data, identity evidence, IT data, contact information, professional data, individual request data, vehicle data, product/service data, satisfaction indicators.

G - To protect our interest and manage disputes

▶ Purpose

To detect and prevent fraud and unlawful activities that might compromise the proper functioning and security of our services, websites or applications. This also includes the protection of D'leteren Automotive interests in case of dispute (for example, with prospects, customers and drivers/users).

▶ Legal Basis

The processing is necessary for the legitimate interests of D'leteren Automotive to maintain financial and technical balance and, to preserve all necessary means to protect its interests in case of dispute/legal proceedings (article 6.1.f GDPR).

▶ Categories of data subjects

Any data subject in conflict with us, irrespective of its status (prospects, customers, company representatives, drivers/users, internet users, visitors, etc.).

▶ Categories of data

Any personal data necessary to protect D'leteren Automotive interests and to provide evidence in relation with a claim (identification data, identity evidence, individual request data, contract data, vehicle data, product/service data, IT data...).

5

**With whom
do we share
your data?**

Where appropriate to achieve the relevant purpose(s), D'leteren Automotive may collaborate with third parties for the processing of your personal data. Depending on the characteristics of the processing activity concerned, your personal data may therefore be shared with one or several categories of recipients identified below.

A - D'leteren Automotive subsidiaries

We may share your personal data among the different subsidiaries owned by D'leteren Automotive. In order to provide you with quality services, D'leteren Automotive is sharing data with the subsidiaries belonging to its network of dealers/distributors (D'leteren Mobility Centers), as well as with other subsidiaries from D'leteren Automotive, depending on the nature of the provided products/services.

B - D'leteren Automotive processors

To ensure the highest level of services, D'leteren Automotive collaborates with external suppliers, in order to benefit from their specific expertise and ensure the highest quality of its own services. More specifically, your data may be processed by the following categories of external entities, acting upon instruction and under the responsibility of D'leteren Automotive:

- IT service providers (hosting, customer relationship management (CRM) software, accounting solution, online platforms, debt collection solution, emailing service, ticketing service, products ordering and delivery software, survey tools...);
- Call center service providers;
- Marketing agencies and companies specialized in marketing support services, including platforms and tools to enable us to better understand the data we have collected about your use of D'leteren Automotive products/services, both in the offline and online environment, to ensure a better match of our personalized marketing campaigns with customer expectations;
- Consultants to perform specific studies to improve D'leteren Automotive products/services;
- Shipping service providers;
- Road assistance service providers;
- Companies specialized in the vehicle transformation/customisation services;
- Installation service suppliers (e.g. for electric vehicle charging stations);
- Security management and guarding suppliers (on-site and remote).

These service providers process the data only for the purposes authorized by D'leteren Automotive and in accordance with the instructions from D'leteren Automotive. They act as processors in this respect. With a view to the optimal protection of the personal data of our customers, we made the necessary contractual arrangements with the aforementioned data processors to ensure that they comply with the highest privacy standards. In any event, data processors shall be required to ensure the security and confidentiality of the personal data. The above list is not supposed to be exhaustive. Specific processors may be required depending on the nature of the processing activities.

C - Public authorities

In some cases and in particular in case of legal obligations, D'leteren Automotive may need to share your data with public authorities or entities in charge of public interest mission, like for instance: tax administration (for D'leteren Automotive accounting control, or for VAT declaration, for instance), CAR-PASS ASBL (for mandatory vehicle mileage data sharing and repair history), law enforcement authorities (in particular, police in case of traffic offence made with a vehicle registered under D'leteren Automotive name (during test drive or with a replacement vehicle, for instance)), data protection authorities, mobility administrations in charge of vehicle homologation (for issuance of legally mandated vehicle documents)...

D - D'leteren Automotive partners

Where relevant and necessary for D'leteren Automotive to achieve the purpose of processing as indicated in the present information notice, your data may be shared with D'leteren Automotive business partners acting under their own responsibility (i.e. independently from D'leteren Automotive). In such a case, D'leteren Automotive requires from the partner to take all necessary measures to ensure confidentiality and appropriate protection of your data as made accessible by D'leteren Automotive.

Depending on the processing activity concerned, those partners may be: independent dealers/distributors, factories, leasing companies (D'leteren Lease e.g.), finance/credit companies (Volkswagen D'leteren Finance e.g.), D'leteren Automotive auditors, external experts/auditors, D'leteren Automotive accountants, insurance companies, bailiffs, lawyers, social media and web advertising partners, educational institutions (and trainees), energy distribution system operators (in case of photovoltaic installation), electricity suppliers (in case of installation of a car charging station), certification bodies (e.g. for certifying an electric vehicle charging station)...





6

**Where are your
data located?**



Your data are primarily stored on servers located within the European Economic Area.

In some circumstances, your data may be transferred to a country outside the European Economic Area. In such cases, the recipients are either located in a country for which the European Commission issued an adequacy decision or are obliged to comply with the same data protection standards as applicable in the EU by means of standard contractual clauses as edited by the European Commission, with supplementary security measures where required.

7

How long do we keep your data?

Your data are kept for as long as is necessary for the processing associated with the purpose for which they were collected.

More precisely: _____

- To deliver products and services and perform quality control: 10 years after the last invoice or after the deregistration of the related vehicle (where applicable);
- To secure D'leteren Automotive premises, assets, tools and events: 1 year after your visit or access, 30 calendar days after your visit for video surveillance recordings and images (insofar as made available by the property manager).
- To promote D'leteren Automotive's products and services: 3 years after the last interaction with us;
- To collect feedback through satisfaction surveys: 3 years after the last interaction with us (to contact you for a survey), and, regarding satisfaction survey results which are not anonymous, 5 years after the end of the survey;
- To interact with you, we keep your data 30 days after the end of the chat session and/or the phone calls, except if necessary to keep them longer in order to answer your requests/claims;
- To protect our interest and manage disputes for a duration corresponding to the limitation period applicable to the relevant legal actions. In case of legal dispute, the data are kept until the end of the dispute and the exhaustion of legal remedies.

In case D'leteren Automotive is subject to specific legal obligations, these terms may be extended in order to ensure the compliance of the processing with the applicable legal rules.



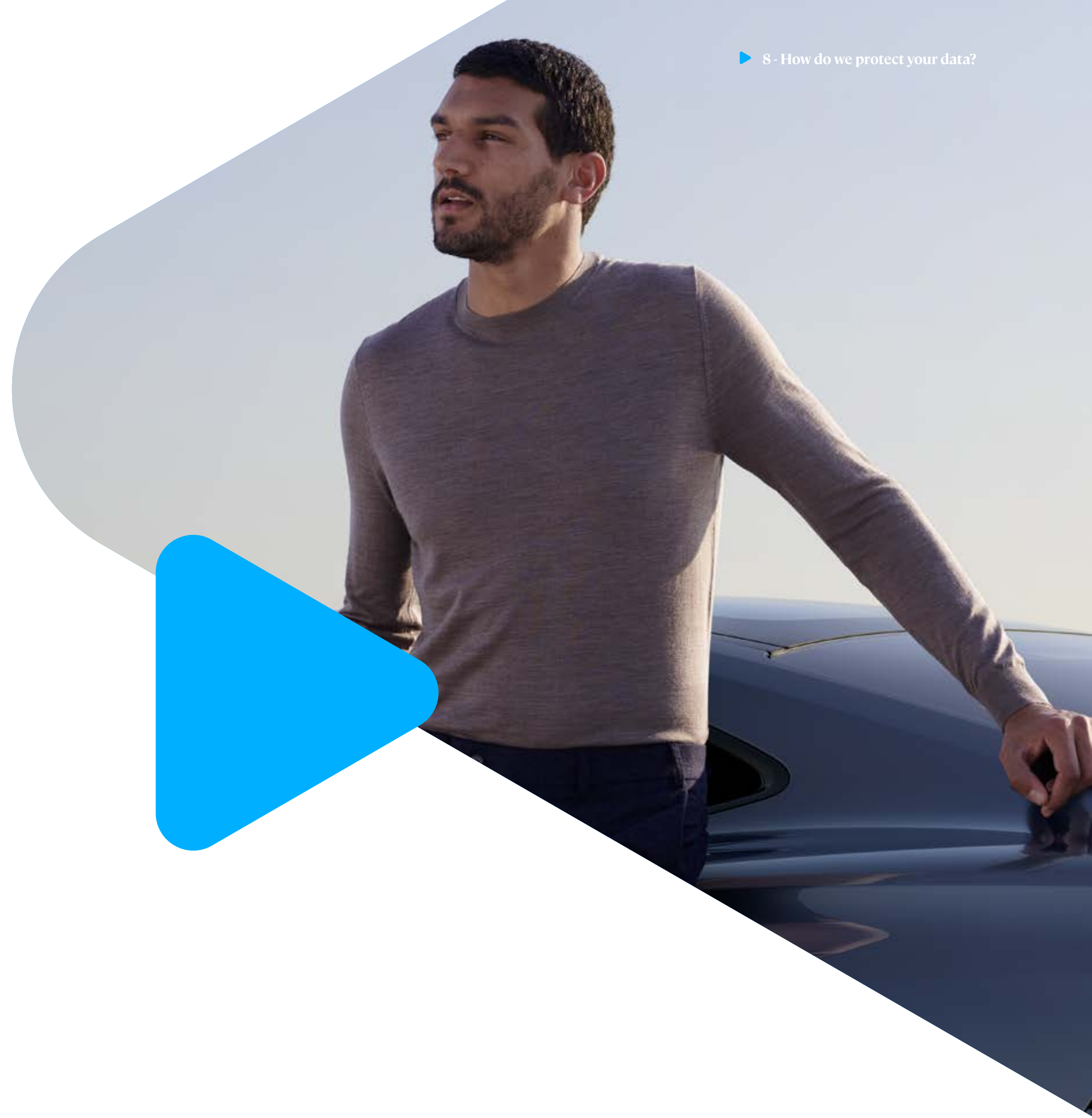
8

How do we protect your data?

At D'leteren Automotive, we are committed to safeguarding the confidentiality and security of your personal information. Our data protection practices align with the highest industry standards, and we adhere to the ISO/IEC 27001:2013 standard to ensure the confidentiality, integrity, and availability of your data. ISO/IEC 27001 is an internationally recognized framework for information security management. This standard reflects our dedication to maintaining robust information security controls and processes.

D'leteren Automotive ensures the security and confidentiality of your data by implementing state-of-the-art measures. Rest assured, your data is handled with the utmost care and protected against unauthorized access, disclosure, alteration, and destruction. We continuously assess and enhance our security measures to adapt to evolving threats and technology.

The handling of data is made according to the information classification schema defined at D'leteren Automotive during its whole lifecycle: creation, access, labelling, sharing, storage, modification, destruction. To keep information integrity, data must not be changed in transit, and security controls are applied to ensure that data cannot be altered intentionally or unintentionally by unauthorized people.



9

**What are your
rights and how
can you exercise
them?**



Within the limits set forth in the GDPR, you may exercise the following rights with regard to your personal data processed by D'leteren Automotive:

- Access and rectification - You have the right to request access to your data and have them rectified if necessary.
- Opposition - You may object to the processing of your data made by us on the basis of legitimate interest. You may object to such use of your personal data at any time, using the various contact points as mentioned in the section "[How to contact us?](#)".
- Withdrawing your consent - Where data is processed on the basis of your consent, you can withdraw that consent at any time, without calling into question the previous processing.
- Portability - The data you have provided to us may be communicated to you or transmitted to a third party in electronic format.
- Erasure - You may obtain the erasure of your data or the restriction of the processing if no longer relevant for the processing purposes.

You may exercise the first five rights by contacting us using the contact details as mentioned in the following section "[How to contact us?](#)".

Right to file a complaint before the Data Protection Authority - If you think D'leteren Automotive does not respect your rights, you may file a complaint before the Data Protection Authority at the following address:

Autorité de la Protection des Données
Rue de la Presse, 35
1000 Bruxelles
contact@apd-gba.be

How to contact us?

To ensure that the way in which we process personal data complies with applicable legislation, D'leteren Automotive appointed a Data Protection Officer (DPO) who is working in close collaboration with a dedicated team of specialised company lawyers of our Data Protection Competence Center (DPCC) department.

For any question regarding the processing of your personal data, you can contact either D'leteren Automotive Customer Care department (customercare@dieteren.be) or our DPO (dpo@dieteren.be), or using the contact forms available on our various web sites and other user interfaces.

Where D'leteren Automotive is jointly responsible for the processing of your personal data, you can always address your questions or concerns to D'leteren Automotive, using the same contact details. In addition, for processing activities carried out in the context of joint controllership, other contact details may also be available, as indicated in the specific information communicated in relation to the activities concerned.

Modifications to this information notice

D'leteren Automotive can modify this information notice at all times. In order to keep you informed of the latest changes of this information notice, we shall update the revision date accordingly. You will also be proactively informed about important changes to the information notice, for instance through a pop-up on our application and on our websites.

The information notice is available (and can be downloaded in PDF format) in several languages, the content of the English version prevailing in case of inconsistency.

