

# Data Privacy Notice

## Alphabet Fuhrparkmanagement GmbH

You expect high standards from our products and services. We use these standards as our guidelines for handling your personal data as part of your use of the Alphabet Fuhrparkmanagement GmbH website. We implement the provisions under the EU General Data Protection Regulations ("**GDPR**") and other legal requirements. Our aim is to establish and preserve a sound basis for a business relationship with our customers and interested parties. Alphabet Fuhrparkmanagement GmbH respects the confidentiality of your personal data and your privacy accordingly. Furthermore, we guarantee the protection of your personal data by putting in place technical and organisational security measures which comply with cutting-edge security standards.

### 1. Who is responsible for data processing operations?

Alphabet Fuhrparkmanagement GmbH (hereinafter referred to as „**Alphabet**“ or „**we**“), Lillienthalallee 26, 80939 Munich, is the controller as defined in the GDPR for processing your personal data. Alphabet Fuhrparkmanagement GmbH is domiciled and has its registry court in Munich, Germany. When initiating and processing contracts for your leasing or rental products and services, and in connection with providing access to the Alphabet websites, the company will process certain personal data for the purposes described in this Data Privacy Notice.

### 2. What data do we process?

Personal data is information pertaining to an identified or identifiable natural person (hereinafter referred to as "**data**"). In the context of your use of the Alphabet websites, we process data on you within the scope permissible under the law, in particular with respect to the principle of data minimisation. This applies to the following information in particular:

- **Personal data which we hold on you:** During your use of the Alphabet websites we collect further data on you. This includes details on how you have used our websites or portal offerings, for example, the date and the time of your enquiries, your IP address, data on the device you use to interact with our customer portal (e.g., hardware or browser settings; browser type, operating system, device ID).
  - **Data about you provided by third parties:** In the context of initiating a contract and application reviews, we will use data provided by third parties on your person. Examples include data records from certain credit agencies, official Alphabet dealers and other third parties.
- In this context, we will process personal data in the following categories in particular:
- Information on your creditworthiness, such as problems with the performance of other contracts known to credit agencies.
  - Information used as a basis for customer relationships, which includes investments in companies and ownership structures, for example.
  - With a view to preventing criminal offences as defined in Germany's Banking Act, we receive certain information from credit agencies on known irregularities. These irregularities are taken account of in the credit decision process.
  - Information on your address from address matching with Deutsche Post to keep postal addresses updated (for example, addresses which you have made available to Deutsche Post in the context of redirection requests and which you have consented being passed on).
  - Information in the public domain to the extent that this is necessary for providing our services. This includes land registries, debtor registers and commercial and associations registers.
  - Information on the use of your vehicle in conjunction with our partners our partners as part of individually used services, such as fuel management.
  - **Special categories of personal data:** As a matter of principle, we avoid collecting and processing certain categories of personal data. Depending on the products booked by the lessee (e.g., claims management), we also collect health

data, if appropriate, in the event of an accident or vehicle damage, e. g., information on personal injuries. In these cases, or if we collect special categories of personal data in order to fulfil the purposes set out below or otherwise process them, this data will always be processed with us in accordance with the statutory requirements and the regulations under this Data Privacy Notice.

### 3. On what legal basis will your data be processed?

We only process your data if permitted to do so by an applicable legal provision. We will process your data with special reference to Art. 6 and Art. 9 GDPR as well as on the basis of consent pursuant to Art. 7 GDPR. In doing so, we will substantiate the processing of your data on the following legal grounds. Please note that this list of the legal grounds is neither complete nor conclusive but is basically aimed at giving examples to illustrate the lawful basis for processing more clearly.

- **Consent (Art. 6 (1) sentence 1 part a), Art. 7 GDPR and Art. 9 (2) part a), Art. 7 GDPR):** We will only process certain data based on your explicit and voluntary consent given at a prior point in time. You have the right to revoke your consent at any time, with effect for the future.
- **Performance of the contract / precontractual measures (Art. 6 (1) sentence 1 part b) GDPR):** We require access to certain data for the purpose of initiating and fulfilling your contract with Alphabet.
- **Compliance with a legal obligation (Art. 6 (1) sentence 1 part c) GDPR):** Alphabet is subject to a range of statutory requirements. We must process certain data in order to comply with these requirements.
- **Upholding legitimate interests (Art. 6 (1) sentence 1 part f) GDPR):** Alphabet will process certain data to uphold its interests or the interests of third parties. This only applies if your interests do not override in the individual case.
- **Assertion, exercise or defence of legal claims (Art. 9 (2) part f) GDPR in conjunction with Art. 6 (1) part f GDPR):** Depending on the product booked Alphabet will, where appropriate, collect certain categories of personal data (e.g., health data) in order to assert your legal claims against insurance companies.

### 4. For what purposes do we process your data?

We will process your personal data exclusively for purposes permissible under data protection law. This applies to the following purposes which are listed as examples:

- Purposes for which you have given us your prior consent;
- Processing for the performance of our contract with you;

- Conducting precontractual measures subsequent to your enquiry;
- Compliance with legal obligations to which we are subject;
- Upholding our legitimate interests or the legitimate interests of third parties provided your interests are not overriding;
- Assertion, exercise or defence of legal claims;
- Marketing and advertising, especially direct marketing.

We will also process your data for the specific purposes cited below, for instance. Please note that this is not a full or conclusive list of such purposes but merely examples to illustrate the aforementioned purposes more clearly.

#### 4.1 Contract-related processing

We need to process your data in order to establish and maintain our contractual relationship with you. Within the scope of our contractual relationship, we will process your data regarding the following tasks and activities in particular:

- (a) Decision on drawing up a contract:** In order to reach a decision on whether we can enter into a contract with you and the conditions under which this is possible, we need to verify and process the data on you. We are required to check your creditworthiness in the context of deciding whether to extend credit. In doing so, we will also transmit your data to credit rating agencies, such as the Schufa credit rating agency. You will find further information on the data processing of the credit agencies with whom we work under Item 7.3 of this Data Privacy Notice.
- (b) Contract-related establishing of contact:** Over the course of the contractual relationship, or for the purpose of initiating a further contractual relationship, it may well be that we would like/have to contact you for reasons relating to the contract. We need the personal information you give us to do this via customer support, or, if appropriate, via the Alphabet websites, for instance.
- (c) Contract management:** Contract management consists of administration, adjustment, handling and renewal of our contracts in general. In performing these activities, we process personal information about you.
- (d) Customer support:** As part of customer support we regularly process your data, to advise you on any necessary adjustments or changes, for example.
- (e) Receivables management:** As part of the leasing and rental business, we are entitled to claims from deliveries and services (hereinafter referred to as receivables) arising from our contractual relationship with you. We process your data (e.g. payment behaviour, balance of open receivables) for the purpose of managing these receivables. If appropriate, we will contact you through various communication chan-

nels (post, telephone, text, email, on-site contact) in order to clarify outstanding amounts. The type of contact may vary depending on the dunning level and default risk. We reserve the right to involve external lawyers and collection service providers on a case-by-case basis. Only information essential for collecting the open receivable will be transferred. If you are actively in contact with your official dealer about open claims or dunning, we reserve the right to share the relevant information with the dealer. In principle, however, we do not transmit personal data pertaining to open receivables.

- (f) Claims management:** If your vehicle is a leasing or rental vehicle, you are obliged to report any damage to the vehicle to us. In this context, and for the purpose of processing damage to the vehicle, we and cooperation partners mandated by Alphabet will process your data if necessary. In addition, the data you have provided us with in order to assert damage claims will be passed on to the process partners involved, such as insurance companies, lawyers and experts, and stored.
- (g) End-of-contract management:** We will process your data when our contractual relationship comes to an end, either under regular or exceptional circumstances. During this process, we may also contact you to discuss the modalities at the end of the contract, if appropriate.
- (h) Cooperation with dealers:** In the context of concluding a contract with you, contract management and support, Alphabet works together with the respective dealer, who will also provide you with support. Moreover, your dealer will also be at hand to assist you, potentially also regarding the termination of the contract (end of term). You may possibly be contacted by your dealer in this connection. The dealer will provide you with support on their own initiative. Alphabet will share the necessary data with the dealer in the context of the cooperation in order to ensure optimal customer support.
- (i) Transfer to third parties as part of contract initiation:** If you use the option of legitimisation via a video identification process or sign the application for a financial product digitally, we will send the requisite personal data to the operators of the platforms used for these processes.
- (j) Transfer to cooperation partners or authorities in the case of optional contractual components:** Alphabet works with cooperation partners in the case of certain optional contractual components such as fuel management, garage service, or tyre service. With customers who have the "fuel management" contractual component, for example, data will be transferred to our cooperation partners (these partners will be indicated in the application for your leasing product when the individual contractual component is booked) in order to provide the fuel card necessary for settling the fuel account. Apart from this, there are cooperations with insurance partners, for example, (these partners are specified in the application for your leasing product in the case of an insurance package) to the extent necessary for performing the contract components selected. If you are unable to ascertain the cooperation partners to whom we send data in your specific case, we are at hand to assist you through the

contact channels specified in Section 10. In the event of an administrative offence or criminal offence relating to driving, drivers' contact details can, if necessary, be forwarded to the relevant authority. Legitimate interest applies in such cases.

## 4.2 Consent-based processing

In some areas, we process your data on the basis of your declared consent to the processing.

- (a) Market research:** To provide our customers with interesting offers in demand, we conduct research on the wishes of our customers. This also includes surveys on how satisfied our customers are with our services. In the context of these research activities, we process anonymised and aggregated data as far as possible, unless you have explicitly consented to personal evaluation.
- (b) Advertising and marketing:** If we have your explicit prior consent, we will process your data in the context of direct advertising measures which are based on the precondition of consent.
- (c) Transfer of personal and contract-related data to group companies for marketing purposes:** If you have given your consent to the transfer of personal and contract-related data, we will transfer these data to the group companies listed in the declaration of consent within the scope specified therein. Based on this consent, these companies may possibly contact you for marketing purposes and send you product information.

## 4.3 Processing to ensure compliance with legal obligations

We are subject to a range of statutory obligations. When necessary, we process your personal data in order to comply with these obligations.

- (a) Credit screening:** As part of the application and monitoring of leasing contracts, we have to process personal data to determine the respective credit standing for the purpose of risk management. Various methods are deployed when ascertaining credit standing. With scoring, we use the relevant data we have on you or which you have given us, taking account of the statutory provisions. Important data generally taken account of in different ways in our scoring procedure, as well as depending on the legal form of the customer, include the following:
  - Financial situation, e.g., income and expenditure;
  - Experience from former business relationships, e.g., your payment history;
  - Information from credit agencies, e.g., about other payment obligations you have;
  - Contract-related data, e.g., leasing instalments.

We evaluate the aforementioned and other information, assign various weightings to it, and incorporate it into a common numerical value. This numerical value is called a "score", and it indicates the how likely it is that payment obligations can be fulfilled. The score is partly calculated by way of an automated process. It supports us in the decision of whether we can approve the leasing application and what form this application can take. In the scoring process, a decision is not arrived at based on the individual pieces of information. It is rather the combination of all underlying factors that is decisive. Scoring enables us to make an objective decision on leasing. It guarantees that we assess each leasing enquiry by applying the same standards. To ensure that the scoring criteria remain informative, precise and up-to-date, we continuously review the processes and develop them further. Scoring is therefore a living system which enables us to make a neutral and reliable decision. If in an individual instance a customer receives a rental vehicle based on the leasing contract, Alphabet has a justified interest in checking customers' credit quality in advance. Alphabet therefore uses the credit quality information that has already been obtained for the leasing transaction.

**(b) Prevention and defence against criminal offences:** Furthermore, Alphabet is obliged to set in place internal security measures aimed at avoiding criminal offences as defined in the Banking Act, as well as to check sanctions lists. In this context, we process personal data and, if appropriate, transfer them to the authorities.

**(c) Purposes of data security:** Our statutory obligations to ensure the security of your data are very important to us. Where applicable, we will also process your data when taking measures to review and ensure data security, e.g. when performing a hacker attack simulation.

**(d) Legal obligations and legal defence:** Alphabet is subject to a series of other legal obligations, for instance in the area of banking supervision. In order to comply with these obligations, we process your data within the scope required and transfer them if necessary in the context of reporting requirements to the competent authorities. Furthermore, we process your data in the event of litigation if such litigation necessitates the processing of your data.

**(e) Submission of enquiries to the Federal Central Tax office**  
In certain cases, Alphabet is required by law to query certain personal data (church tax, tax ID) at the Federal Central Tax Office (BZSt) in the case of account holders and other authorised parties and economic beneficial owners.

#### 4.4 Processing based on legitimate interest

We process some of your data based the legitimate interests, provided that your interests are not overriding.

**(a) Advertising and marketing:** We use your data for the purpose of direct advertising activities which are not based on any explicit prior consent, as well as for marketing measures.

We also process your data to inform you about offers which may be of interest to you and to contact you through various communication channels.

**(b) Business intelligence and reporting:** With a view to continuously improving our products and services, we carry out certain automated analyses of contractual information and prepare relevant reports. Based on these analyses, we derive new products or measures to improve customer processes, for instance. Similar to sales management, we always prepare the aforementioned analyses and reports in an aggregated and anonymous form.

**(c) Administrative tasks within the BMW Group:** Alphabet is a member of the BMW Group. We process your data partly to ensure that the various companies within the BMW Group are managed as efficiently and successfully as possible. This applies, for example, to joint consolidated accounting in line with international accounting standards for companies (such as the International Financial Reporting Standards (IFRS)) as well as to the subsidising of individual leasing contracts by BMW AG.

**(d) Managing incentives for sales personnel and dealers:**  
To incentivise BMW franchise dealers and their sales personnel to sell the products of Alphabet and its partners, such as leasing and rental services or add-on products, Alphabet uses the "allstarlounge" incentive platform operated by the BMW Bank. Its primary purpose is to offer sales personnel at the dealers incentives to sell the products based on a defined system of points, along with gifts or prizes, i.e. Incentive schemes for sales teams. Incentives are based among other things on contractual information on active customer contracts to the necessary extent.

**(e) Use as part of the IT change management process:** We continually develop our system environment. We do this in order to comply with regulatory requirements and to make the contractual relationship as easy as possible for you by optimising our systems on an ongoing basis. As part of these activities, we process your personal data where appropriate as part of crosssystem integration tests in order to ensure data integrity within our application.

**(f) Transfer of positive data to credit agencies:** So-called positive data is transferred to credit agencies during the contractual relationship. These data include personal data regarding amendments to or ordinary implementation or termination of a contractual relationship with financial default risk.

**(g) Transfer of negative data to credit agencies:** Provided that the legal requirements for the transfer of receivables-related data are met, we may also transfer data in the event of anticipated payment default we may also transfer data to credit agencies.

**(h) Vehicle location (BMW and MINI):** In the cases described below, in order to carry out vehicle location we reserve the right to obtain technical data from the vehicle and from the databases of BMW AG, and to process those

data and use them in order to implement the contract. In the case of leasing contracts, vehicle location may be carried out if the leasing contract ends and the vehicle has not been surrendered to Alphabet Fuhrparkmanagement GmbH after an appropriate deadline has elapsed. Furthermore, any case in which vehicle location has to be carried out may constitute grounds for suspecting conduct that may have consequences under criminal law. That also forms the basis for our legitimate interest in seizing vehicles which are owned by us and where there are grounds for suspecting criminal conduct.

## 5. How long do we keep your data?

In accordance with Art. 17 GDPR, we will keep your data only as long as is necessary for the respective purposes for which we process your data. In the event that we process data for several purposes, they are automatically deleted or stored in a format that does not permit conclusions to be drawn directly as regards your person as soon as the last specific task has been performed. To ensure that all of your data are deleted in line with the principle of data minimization and Art. 17 GDPR, Alphabet uses an internal scheme for deletion of data. The basic principles of the scheme for deletion of your personal data are described below.

If no contract is drawn up after your application has been submitted, we will generally delete your data no earlier than six years after the date of the application due to legal obligations to retain the data. At the end of the contract term, we will generally delete your data after 5 years at the earliest due to obligations to retain the data under banking law. If we are required by law to archive some of your data for a longer period, for instance because of obligations under tax law, we will delete these data as a rule 10 years after the end of the contract.

## 6. How are your data protected?

Along with actual data protection, Alphabet also places great importance on the topic of data security. We will process your personal data in accordance with the requirements, regarding secure processing as described in Art. 32 GDPR. To this end, we deploy extensive technical and organisation security measures which reflect recognised IT standards and which are subject to continuous monitoring. This enables us to ensure that your data are appropriately safeguarded at all times against improper use or any other form of unlawful data processing.

Alphabet uses a safe transmission process which is currently based on the TLS protocol (Transport Layer Security Protocol). Information which you enter on our websites via dialogue and application forms are transmitted through this safe procedure and used exclusively for specific purposes.

The TLS protocol facilitates the encryption of the entire data traffic between your browser and Alphabet's server. Your data are therefore protected during transmission against manipulation and unauthorised access by third parties.

## 7. With whom will we share your data?

We will share your data for the purposes described in this Data Privacy Notice with third parties external to Alphabet. When transferring your data, we will always take suitable steps to ensure that your data are processed, protected and submitted in accordance with the applicable legal requirements.

### 7.1 Data transfer within the BMW Group Financial Services

Your personal data will remain in the possession of Alphabet to the extent possible. With that in mind, we also observe the principle of data minimisation. Alphabet is, however, part of the BMW Group Financial Services (hereinafter referred to as "**BMW FS**") which maintains more than 50 companies across the globe. Your data will therefore be transmitted where appropriate in the individual case to one or several subsidiaries of BMW FS or the BMW Group. A transfer of this kind may be feasible particularly in the circumstances described below:

- If you have given us your explicit prior consent to sharing your data for advertising or marketing purposes with other companies of BMW FS or of the BMW Group.
- In principle, we generally report anonymised or aggregated data to BMW AG and BMW FS. It may be the case, however, that information pertaining specifically to contracts and/or chassis numbers are transferred in an internal report of this kind.

### 7.2 Data transfer within the BMW Group

- As part of BMW FS, Alphabet is also a member of the BMW Group. We transfer your data in part to other companies of the BMW Group who process your data fully on our behalf and in accordance with our instructions. Order processing of this kind is performed for example at BMW AG's BMW Group IT. Where appropriate, we will also transfer your data to other companies of the BMW Group which will process the data under their own responsibility. Data transfers of this kind may take place under the following circumstances and for the following purposes, for instance: If you have given us your explicit prior consent to sharing your data for advertising or marketing purposes with other companies of the BMW Group.
- As part of the process of consolidated reporting, we transfer data to BMW AG, where appropriate, an example being information on the respective chassis numbers relevant for billing to BMW AG in the case of leased vehicles in the context of evaluating the residual value.

### 7.3 Data transfer to Alphabet authorized dealers

Authorized dealers through whom you draw up a customer contract will be granted access to certain specific data by Alphabet,

for the duration of the contract. Your authorized dealer will be granted access, in particular so that they can serve you as the individual customer and to allow them to implement and process your contract until the end of the relationship. In doing so, the authorized dealer will carry out the following tasks (NB: this is not a complete or exhaustive list of data transfer procedures within the BMW Group; it merely provides examples, to ensure transparency regarding data transfers):

- arrange financial products and submission of applications (leasing, financing, insurance)
- legitimization as defined in the Money Laundering Act
- support for claims management (vehicle)
- end-of-contract management (return of vehicle; sale of vehicle)

## 7.4 Data transfer to credit agencies

### – Data transfers to SCHUFA

Within the scope of this contractual relationship, Alphabet Fuhrparkmanagement GmbH transfers data on behaviour in breach of contract and on fraudulent behaviour to SCHUFA Holding AG, Kormoranweg 5, 65201 Wiesbaden. The exchange of data with SCHUFA also serves the purpose of compliance with legal obligations to conduct checks on customers' creditworthiness (Section 505a of the German Civil Code (BGB), Section 18a of the German Banking Act (KWG)).

SCHUFA processes the data it receives and also uses it for scoring in order to provide its contractual partners in the European Economic Area and in Switzerland and, if appropriate, in other non-EU countries (provided adequacy decisions have been approved by the EU Commission in respect of these countries), with information to facilitate assessing the creditworthiness of natural persons, among other aspects. More detailed information on SCHUFA's activities can be found in the SCHUFA Information Sheet pursuant to Art. 14 GDPR or viewed online at [https://www.schufa.de/en/schufa-information/schufa-information\\_en.jsp](https://www.schufa.de/en/schufa-information/schufa-information_en.jsp).

### – Data transfers to Creditreform

Alphabet transfers data on applications for credit services (name, address, date of birth, address, where appropriate, and reason for application) to credit agency Creditreform München Ganzmüller, Groher & Kollegen KG, Machtfinger Str. 13, 81379 Munich, as well as to Verband der Vereine Creditreform e.V. (Federation of Credit Reform Associations), Hellersbergstraße 11, 41460 Neuss, for the purpose of credit assessment. The legal basis for these data transfers are Art. 6 (1) part b) and Art. 6 (1) part f) GDPR. Transfers based on Art. 6 (1) f) GDPR may only be made to the extent that this serves the purpose of upholding the legitimate interests of Alphabet or of third parties, and provided that the interests or fundamental rights and freedoms of the data subject requiring the protection of personal

data do not override. The exchange of data with Creditreform also serves the purpose of fulfilling legal obligations to conduct checks on customers' creditworthiness (Section 505a German Civil Code (BGB), Section 18 a German Banking Act (KWG)). You can obtain further information on data processing by Creditreform at <https://www.creditreform-muenchen.de/datenschutz>.

Alphabet obtains information from the aforementioned credit agencies regarding payment history, existing customer associations and credit quality on the basis of mathematical-statistical procedures using address data. The credit agencies only supply their contractual partners with personal data if in an individual instance the contractual partner can credibly demonstrate a legitimate interest in the transfer of the data. The information on you held by the respective credit agency is transferred to Alphabet. The credit agencies will not inform you separately again about data transfers to Alphabet. You can ask the credit agencies to supply information about the personal data about you which they hold.

## 7.5 Data transfer to other third parties

Under certain circumstances, we will transfer your data to other third parties, such as external service or IT providers, payer's payment service providers, external consultants or cooperation partners for the purposes cited in Section 4, as well as in the context of disclosure and reporting obligations. Alphabet will ensure that these third parties guarantee the confidentiality of your data.

## 7.6 Data transfer to countries outside the EU

If your data are processed in countries outside the EU or the European Economic Area ("EEA") for the data processing procedures described in Sections 7.1, 7.2, Alphabet will ensure that your data are processed in accordance with European standards on data protection. To the extent necessary, and with a view to securing the data transferred to recipients in countries outside the EU or the EEA, we will make use of data transmission agreements based on EU standard contractual clauses or other rules and regulations under data protection law, which also includes suitable technical and organisational measures for safeguarding the data transferred.

A number of countries outside the EU have already been officially recognised by the EU as having an appropriate and comparable level of data protection. Consequently, data transfer in these countries does not require any special official consent or agreement under the applicable data protection law. If as you would like to access the technical safeguards for transferring data to other countries, please contact us using the contact options listed in Section 10.



## 8. Your rights as a data subject and your right to lodge a complaint with the supervisory authority

As the data subject, i.e. the person affected by the processing of your data, you can assert certain rights in relation to us under the GDPR as well as under other applicable data protection provisions. The following section contains explanations of your rights as defined by the GDPR.

### 8.1 Data subject rights

Under the GDPR, you as the data subject have the following rights in relation to Alphabet:

- **Right to access stored data (Art. 15 GDPR):** You can ask us to provide you with information on any data we keep on you at any time. This information concerns, among other things, the data categories we process, for what purposes we process them, the origin of the data if we did not acquire them directly from you and, if applicable, the recipients to whom we have sent your data. You are entitled to copy of your data covered in this agreement free of charge. If you need further copies, we reserve the right to charge for the additional copies.
- **Right to correction (Art. 16 GDPR):** You can ask us to correct your data. We will initiate appropriate measures to ensure that the data about you which we process are correct, complete, up to date and relevant, based on the latest information available to us.
- **Right to deletion (Art. 17 GDPR):** You can request that we delete your data provided that the relevant legal requirements have been met. In accordance with Art. 17 of basic EU data protection regulations, this may be the case if
  - The data are no longer required for the purposes for which they were acquired or otherwise processed;
  - You revoke your consent, which is the basis of the data processing, and there is no other legal basis for the processing;
  - You object to the processing of your data and there are no legitimate reasons for the processing, or you object to data processing for the purposes of direct advertising;
  - The data has been processed unlawfully;
  - to ensure compliance with a legal obligation that requires us to process your data, in particular with regard to legal retention periods;
  - To establish, exercise or defend against legal claims.
- **Right to restriction of processing (Art. 18 GDPR):** You can request that we restrict the processing of your data if
  - You dispute the correctness of the data, specifically for the period of time we need to check the correctness of the data;
  - The processing is illegal but you do not wish to have your data deleted and request a restriction of use instead;
  - We no longer need your data, but you need these data to establish, exercise or defend against legal claims;
  - You have filed an objection to the processing provided it has not yet been determined whether our legitimate grounds override yours.
- **Right to data transferability (Art. 20 GDPR):** At your request, we will provide you with your data in a portable form to enable you to transfer your data to another controller (to another leasing company, for instance). However, this right only applies if the data processing is based on your consent or is required to implement a contract.
- **Right to objection (Art. 21 GDPR):** You can object to the processing of your data at any time for reasons that arise from your special situation provided the data processing is based on your consent or our legitimate interest or that of a third party. In such cases, we will no longer process your data. The latter does not apply if we are able to prove there are compelling, defensible reasons for the processing that override your interests or we require your data to establish, exercise or defend against legal claims.

### 8.2 Time limits for compliance with data subject rights

As a general principle, we make every effort to comply with all requests within 30 days. This period can, however, be extended for reasons related to the specific data subject right or to the complexity of your request.

### 8.3 Restricted provision of information when fulfilling the data subject's rights

In certain situations, pursuant to certain legal provisions we may refrain from supplying you with information about all of your data. If we have to refuse your request for information in such a case, we will inform you of the reasons for refusal at the same time.

### 8.4 Complaints to supervisory authorities

Alphabet takes your concerns and rights very seriously. If you are of the opinion that we have not dealt with your complaints or concerns adequately, you have the right to lodge a complaint with the relevant data privacy protection authorities.

## 9. Access to legislation

You can access the text of the GDPR on the following homepage:

<http://eur-lex.europa.eu/>.

Other legislation relevant to Germany can be found at:

<http://www.gesetze-im-internet.de>

With regard to the processing of personal data, the following legislation is applicable to Alphabet:

- Federal Data Protection Act (BDSG)
- Germany's Banking Act (KWG)
- Money Laundering Act (GWG)

## 10. Contact information

Please send written enquiries/applications to us:

Alphabet Fuhrparkmanagement GmbH, Datenschutz,  
Lilienthalallee 26, 80939 Munich

Please feel free to contact our Data Protection Officer directly  
at the following email address:

[alphabet\\_datenschutz@alphabet.de](mailto:alphabet_datenschutz@alphabet.de)