



## PRIVACY STATEMENT

DOCKR B.V. considers the protection of personal data to be of vital importance. We therefore process your data with the greatest possible care. This Privacy Statement explains how we deal with your personal data.

### Who is responsible for processing your personal data?

In this Privacy Statement, DOCKR B.V. (hereafter: 'DOCKR' or 'we') explains how it deals with your personal data as the party responsible for processing the data when you utilise our services, such as a subscription for the use of our vehicles or this website.

### What is 'personal data'?

Information about an identified or identifiable natural person is considered to be 'personal data'. Whether certain information should be considered as personal data depends in part on whether DOCKR possesses legal means by which it can reasonably be assumed that such means can be used to identify the person in question.

### The personal data we process

We process your personal data because you have provided them to us when entering into an agreement with us, or when you use this website.

#### Data generated by your use of our services and/or website

When you utilise the services offered by DOCKR, such as a subscription for the use of a vehicle, or have other forms of contact with us, we will process the following personal data depending on the service that you utilise:

- Data that are necessary to facilitate the lease of a vehicle, such as your contact details, name and address;
- Data that are necessary for the financial administration, such as your bank account number, name and address;
- Your communications preferences and settings;
- Internet surf behaviour, as determined through our own observations or cookies (see also Article 9 of this Privacy Statement);
- Data pertaining to your peripherals, such as a MAC address, IP address or other number;
- Data on your use of our customer service.

### Processing: grounds and justified interests

The processing of personal data takes place on the following legal grounds:

1. Permission;

2. Implementation of an agreement with you;
3. Legal obligation;
4. Performance of a task in the general interest;
5. Justified interest of DOCKR or a third party.

Justified interests include: security, (crime) prevention, IT management, research and analysis into the company's products and services, business administration, legal affairs and internal administration.

### **Purposes for processing personal data**

We take the utmost care when processing your personal data. We only use the data necessary to provide our services. DOCKR processes your personal data for the purposes listed below. The number behind each purpose corresponds with the grounds listed in Article 4 of this Privacy Statement.

#### A) Purposes for providing our services

- The issue, receipt and maintenance of the vehicle [grounds 2];
- Maintaining DOCKR's administration for financial and fiscal obligations, including the (collective) invoicing for our services [grounds 2 or 3];
- The lost-and-found process for lost or stolen vehicles, and via tracking in the event of non-payment [grounds 2];
- Communicating with and informing you, and providing services such as customer service [grounds 2 or 5];
- Providing service, such as maintenance, repairs and/or replacement of the vehicle [grounds 2].

#### B) General purposes

- Building and maintaining a relationship with the customer [grounds 2];
- Providing customer service, including purchasing services and processing complaints and requests [grounds 2];
- Processing personal data into management information [grounds 2];
- Conducting market research, including measuring customer satisfaction, in order to improve our operations, brands, services and products [grounds 5];
- The continued development and improvement of new and existing products and services [grounds 5];
- Compliance with legal obligations, dispute mediation and enforcing our rights and agreements [grounds 2, 3 or 5];
- Analysing cookies on our website. We do this to attune the contents of our communications as much as possible to your personal preferences [grounds 1 or 5].

### **No processing of personal data on persons under the age of 16**

We do not intentionally collect data on persons under the age of 16. We advise parents to be involved in their children's online and offline activities, in order to prevent their personal data from being processed by DOCKR.

## Sharing with third parties

DOCKR shares your personal data with third parties in the following situations, and for the following reasons. The number behind each purpose corresponds with the grounds listed in Article 4 of this Privacy Statement.

- If we are legally required or authorised to provide personal data to third parties [grounds 3];
- If we suspect criminal activity, misuse or a violation of the rights of third parties, we may provide personal data to third parties that have a justified interest, or to authorities that serve the general interest. These may be enforcement authorities, such as the Public Prosecutor's Office or supervisory bodies [grounds 3, 4 or 5];
- DOCKR may share your data with others in the implementation of an agreement with you, or due to justified business interests such as maintaining a central administration or customer service and analysing the services we provide to you [grounds 5];
- With parties that assist DOCKR in providing its services, which are not processors themselves, such as accountants and (legal) advisors [grounds 5];
- For commercial purposes, such as the sale of business activities or shares, or a reorganisation [grounds 5];

DOCKR also utilises the services of third parties that act as 'processors', such as hosting service providers. If these third parties can be designated as a processor in accordance with applicable data protection legislation, then DOCKR will enter into written agreements with these third parties. These service providers will only process personal data in accordance with the instructions given by DOCKR, and under DOCKR's supervision.

If personal data are sent to a recipient in a foreign country, then it is usually only sent to a recipient in a country that the European Commission has determined to offer a suitable level of protection for personal data. If personal data are sent to a recipient in a country that does not offer a suitable level of protection, then DOCKR will ensure that the legally required protective measures are taken. If you would like to receive further information about the provision of your personal data to countries outside the European Economic Area, you may contact the Data Protection Officer at DOCKR (see Article 12).

## Storing your personal data

We will only store your personal data for as long as necessary or permitted for the purposes described in this Privacy Statement, and in accordance with the applicable legislation. The criteria used to determine this storage period include:

- The duration of the period in which we have an ongoing relationship with you and provide you services (for example; as long as you continue to utilise our services);
- Whether there is a legal obligation that we must meet (for example, certain laws require us to store our transactions for a specific period before we can delete them);
- or
- Whether storing the data is desirable due to our legal position (for example, with regard to expiration terms, disputes or investigations by regulatory agencies).

### 9. Analysing website visits

When you visit our websites or purchase our services, we may use cookies, web beacons or other similar technologies to store information with the purpose of personalising advertising

messages and offering you a better, faster and safer customer experience. You can state whether or not you would like to use cookies. For more information about the use of cookies, please refer to our cookie statement (<https://DOCKR.nl/cookies/>). Visitors to our website may find links to other websites. We are not responsible for how these websites deal with your personal data. For more information, please consult the privacy statement for the website you are visiting.

### **Your rights, including the right of objection**

You have the right to know which of your personal data we process, and to whom we have provided your personal data. If you have granted permission for the processing of your personal data, then you also have the right to withdraw that permission.

If you would like to view, correct, edit, limit or delete the personal data that we process, object to the processing of personal data or direct marketing, or if you would like to receive a digital copy of your personal data to provide it to another company (inasmuch as applicable legislation gives you the right to transfer the data), then you can contact the Service Desk using the contact details provided in Article 12. We ask that you describe in as much detail as possible the personal data that your request refers to. We will reply to your request as quickly as is reasonably possible, or at most within the period required by law. Finally, you have the right to submit a complaint to the Data Protection Authority.

You may only exercise those rights which are granted to you by law. In order to ensure that you were the person making a request, we may ask that you send a copy of proof of identification with your request. We will only do so if we believe it is necessary to identify you, and we will also ask that you make the photo, MRZ (machine readable zone; the line of numbers at the bottom of the passport page), passport number and Citizen Service Number illegible. We will destroy the copy of your proof of identification immediately after we have identified you.

### **Security and data protection**

DOCKR has taken suitable security measures to prevent as much as possible the misuse, loss, unauthorised access, unwanted publication and unauthorised changes of your data. DOCKR has implemented both technical and organisational measures to secure your personal data, including the use of encryption technologies. These security measures are revised periodically based on current threats.

### **Contact**

DOCKR has its registered office in Amersfoort. If you have any questions and/or comments about this Privacy Statement, please feel free to contact:

DOCKR B.V.  
Attn.: Privacy  
Stationsplein 19A  
3818 LE Amersfoort  
E-mail: [privacy@pon.com](mailto:privacy@pon.com)

Our Data Protection Officer can be reached via e-mail at [privacy@pon.com](mailto:privacy@pon.com), or per post via the address provided above. Please include 'Attn.: Data Protection Officer' in the subject line of your e-mail or letter.

### **Edit history**

The manner in which we process personal data, and the composition or volume of the data we process, may change over time. We therefore reserve the right to amend this Privacy Statement as needed. You will be notified of any changes if necessary.

*This statement was last revised on 4 June 2020.*