

Personal Data Processing Policy

This document will show you the purpose of our collecting your data and what we do with them.

1. Who is responsible for processing your data and who can be contacted?

Your data controller is Santander Leasing S.A. (hereinafter: "the Company") and it that may be contacted:

- in writing, any correspondence to be posted to the address: Santander Leasing S.A., at: ul. Kolorowa 8, 60-198 Poznań,
- by phone, at: +48 61 850 35 25,
- by e-mail: kontakt@santanderleasing.pl
- otherwise, as specified on the website: www.santander.pl/santander-leasing.

We have appointed a data protection officer who may be contacted on data protection issues:

- in writing, to the address: Santander Leasing S.A., ul. Kolorowa 8, 60-198 Poznań, with a note: "Data Protection Officer"
- and by e-mail, to the e-mail address: iod@santanderleasing.pl

2. Why and on what basis we process your data

We process your data pursuant to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the Protection of Natural Persons with regard to the Processing of Personal Data and on the Free Movement of such Data, and Repealing Directive 95/56/EC (GDPR) and the relevant Polish provisions which govern personal data protection.

We may process your data:

- to conclude or perform contracts concluded with you or in which you participate,
- to fulfil legal obligations,
- for the purposes of our legitimate interest,
- to carry out tasks in the public interest,
- based on your consent.

3. In what situations we process your data

- We process the data in order to carry out our leasing or lending operations and to render other services to perform contracts concluded with you or to perform measures taken up at your request before or after a contract is concluded.
- We process the data to carry out the tasks involved in concluding or performing a contract, in connection with which the data were provided to us, e.g. in order to enter into a relationship under an agency agreement, intermediary services agreement, cooperation agreement or other business contracts, as the case may be, and for recruitment purposes.
- We also process the data when we fulfil numerous legal obligations imposed by law or regulatory requirements. The relevant regulations include those on preventing money laundering and terrorist financing, fiscal legislation, labour law and social security regulations, and other. We may also be obliged to carry out tasks in the public interest, in particular, for purposes involving crime prevention and ensuring the security of economic transactions.

Moreover, we may process your data in order to, in particular: verify your identity and the identity of the persons you represent, assess your creditworthiness, analyse credit risk, accept security for the debts due to us, fulfil tax obligations, including monitor and report under the tax law, monitor the timely repayment of debts and properly manage the risk, prevent mis-selling, which is, not to offer you products which mismatch your needs.

In certain situations, we process your data for the purposes which arise from legitimate interests pursued by us or a third party. This is what we do e.g.

- to determine the level of involvement of entities within the Santander Bank Polska Group or Erste Group in cooperation with you,
- to establish claims, to assert them, defend against them,
- to examine if you are satisfied with our services,
- in direct marketing of the products and services provided by us, the entities making up the Group of Santander Bank Polska and Erste Group, and other entities for which we render services,
- for our internal administrative purposes and to optimise internal process, including through the use of trusted IT tools based on artificial intelligence (AI) technology for the analysis, aggregation or summarisation of data,
- to be able to manage employment-related issued or issued connected with cooperation or relations with you and our contractors,
- to analyse the credit portfolio, prepare statistics and report for our own use and the use of the Group of Santander Bank Polska and Erste Group,
- when you act for the benefit of our clients or contractors or on their behalf,
- when we use video surveillance for security purposes,
- when we submit information to authorities or institutions as part of administrative obligations or in response to queries received,
- when we act for the prevention of crime committed to the detriment of financial institutions, banks, lending institutions, payment institutions and their clients,
- when we act to ensure information security.

We process your data also on the basis of your consent. We are granted the consent for specific purposes, e.g. so that we can process specific categories of personal data, send the data for marketing purposes within the Group of Santander Bank Polska¹ and Erste Group². You can withdraw the consent any time. Withdrawing the consent has no effect on the compliance of our processing of your data by the time the consent is withdrawn or in the circumstances in which we process your data on a basis other than your consent.

4. To whom we may transmit the data or make them available

Your data may be made available or transmitted to other recipients in order to perform a contract concluded with you, in order to perform a legal obligation imposed on the Company, based on your consent or for the purposes arising from the legitimate interests of the

¹ By the Santander Bank Polska Group we mean Santander Bank Polska S.A. and entities related by capital or organization, including entities that may be established in the future. The list of entities is available on the website <https://www.santander.pl/o-banku/o-nas>

² By the Erste Group we mean a universal banking group headquartered in Austria. More information is available at <https://www.erstegroup.com/en/about-us/corpgov>

controller or a third party.

The recipients may include in particular:

- our authorised employees and other persons authorised by us,
- the Financial Supervisory Authority, the Ministry of Finance, the Office of Competition and Consumer Protection, the Personal Data Protection Office, the General Inspector of Financial Information, the Financial Ombudsman, public administration authorities and the Credit Information Bureau (Biuro Informacji Kredytowej S.A),
- international financial institutions, (e.g. European Investment Bank, Europe Development Bank), clearing houses, tax authorities, labour law and social security institutions,
- the Polish Leasing Association, business information bureaus, banks, lending and payment institutions, participants of payment systems, fuel suppliers, national insurance institutions, insurance agents and brokers, as well as other institutions authorised to receive your data under applicable legal regulations, entities within the Santander Bank Polska Group and Erste Group.

The data are also transmitted to entities processing data as mandated by the Company and the persons acting under their authority, such entities processing data based on a contract with us and only as instructed by us and provided that they maintain confidentiality, professional and insurance secrecy. In particular, they are entities providing services in banking, IT, debt collection, legal, postal, insurance (including insurance intermediary services), agency, intermediary services, marketing, supporting the process of repair and servicing of financed objects or loss adjustment.

5. In what situations and how we can transmit your data outside the European Economic Area (EEA)

We can transmit your data to recipients in countries outside EEA, the so-called third countries, including USA, in the following cases:

- it is necessary for us to perform a contract we concluded with you or to take up measures before the conclusion for the purposes of concluding it,
- as part of the Company's using the IT infrastructure (computing cloud, electronic mail),
- when we are granted your consent.

In case the data processing involves transmitting the data outside the European Union, such a transfer will be effected when the European Commission (EC) concludes that the third country or an international organisation ensures an appropriate level of protection or adequate safeguards are in place, e.g. by concluding with the recipient the standard data protection clauses approved by the European Commission (EC).

In other situations, your data may be transmitted to third countries in the cases stipulated in GDPR. To obtain a copy of the data transmitted to a third country, please request it from the data protection officer.

6. How long your data will be processed (including stored)

We will process your data as long as it is necessary. It depends on the purpose of processing. Your data will be processed for a period necessary to meet the purposes of processing specified in items 2 and 3, i.e.:

- to perform a contract we concluded with you by the time the performance ceases, and thereafter, to assert out claims, if any, or defend against claims, subject to the limitation period for claims stipulated by law and for a period required by law,

- to fulfil our legal obligations with regard to our pursuing business operations and performing contracts we concluded, for as long as our obligations remain unfulfilled,
- to fulfil obligations arising from regulations on the prevention of money laundering and the financial terrorism, for the period required under those regulations,
- in situations where we process the data only based on your consent - until you withdraw your consent,
- as long as we have a legitimate interest in processing the data or by the time you object to such processing, if there are no legal grounds for us to continue processing the data.

7. What rights you have

You are entitled:

- to obtain access to your personal data, rectify them, and also demand that we restrict their processing or erase them,
- to object against data processing when you are in a particular situation and we process the data for purposes which arise from our legitimate interests or when we do it for marketing purposes, profiling included. Profiling means automated processing of data for the purpose of creating individual customer profiles, thereby inferring their characteristics and predicting behaviours, such as the likelihood of purchasing a given product or assessing creditworthiness.
- at any time, to withdraw your consent to processing with regard to the scope to which the consent pertains. However, your withdrawing the consent will have no effect on the compliance of the processing which took place on the basis of the consent before it was withdrawn. The foregoing also pertains to withdrawing consent to contacting by phone or e-mail for marketing purposes;
- to transfer the data you provided us with and which we process on the basis of your consent or in order to conclude and perform a contract. If you request so, we can send the data to another data controller, if technically possible. The data portability right does not pertain to data being our trade secret.
- to lodge a complaint with a supervisory authority, i.e., the President of the Personal Data Protection Office, if you find that we process your data contrary to GDPR.
- If the foregoing is necessary for your rights to be exercised, we may need further information from you that will be necessary to confirm your identity.

8. Are you obliged to provide the data?

If you do not provide us with your data, we will not be able to conclude nor to perform a contract with you. Your providing the data is voluntary, yet necessary for the purposes of concluding a contract with us and performing it. In such a situation we need and we are obliged to identify you and to collect and record your data. We will use the data to pursue our legitimate interest (e.g. for credit assessment or asserting claims) or to fulfil the obligations arising from regulations. Such an obligation is imposed on us in certain situations, including by the regulations on preventing money laundering and financing terrorism.

9. Where do we obtain your data from and what are the data categories?

Most of the data we process comes directly from you, from the person representing you or acting on your behalf, or from an entity that represents you.

- Some of the data may come from, inter alia: business information bureaus, Biuro Informacji Kredytowej S.A. [credit reporting agency], the PESEL Reservation Register, the Electronic System of Land and Mortgage Registers, publicly available sanctions lists, entities who obtained your consent to provide data, from public records and registers. These sources also pertain to data such as: client identification data, contact data, socio-demographic data (e.g. data regarding employment, education, marital status), data on your liabilities.
- If you are a business entity, some data may be obtained from other public sources, such as: National Court Register (Krajowy Rejestr Sądowy), Central Registration and Information on Business (CEiDG), the Central Register of Beneficial Owners (CRBR), publicly available sanctions lists published by the relevant government authorities and international organisations, the Central Statistical Office (Główny Urząd Statystyczny) or similar sources located in other countries, and from private entities specialised in collecting and sharing information on business entities.
- In the case of the data of persons representing you or acting on your behalf, we obtain the data both from the above mentioned sources, and from you.

10. When and to what extent we use automated decision-making, including profiling

When we process your data, we may make automated decisions. It pertains to:

- assessing your creditworthiness when we conclude a contract with you. In such a situation, we assess: the data provided in an application you file for any products or services we offer; or the information about we hold in connection with your use of any products and services; or information obtained in the course of report analysis (including reports obtained from Credit Reporting Agency (Biuro Informacji Kredytowej S.A) and any business information bureaus and interbank lists of bad debtors. Such verification is conducted on the basis of a defined set of rules and algorithms we developed to assess the creditworthiness the best way possible. The assessment may result in: automatic consent or an automatic refusal to concluding the contract, or an individual decision.
- Concluding whether you meet the conditions for us to be able to offer you certain services. In such a case, we analyse the data we hold or we obtained from other entities, e.g. how actively you use some services. We specify the conditions on a case-by-case basis in the documents regarding a given service, e.g. a contract, rules, or the principles for rendering a given service. The assessment may result in: automatic consent to or an automatic refusal to providing the service to you, or an individual decision.
- The risk of money laundering, terrorism financing and other crimes. In making the assessment, we take into account the information and the data from the documents you provided while concluding the contract or ordering a transaction. We assess this risk on the basis of specified criteria: economic, geographical, factual, behavioural. We also analyse data, such as those pertaining to payment transactions, for your security as well. Consequently, you are qualified for a risk group. In case it is an unacceptable risk group, we may be automatically blocked from entering into a relation with you.

When we make decisions automatically, you have the right to seek the intervention of our employee to express your opinion and to challenge such a decision. It pertains to decisions which are necessary for us to conclude a contract with you or to perform it, or which are based on your explicit consent.

We may also process your data partly automatically while profiling. We do this to provide you with information about products adjusted to your needs. **We then use analytical instruments such as market research or opinion polls.** When we process your data for this purpose, we take into account, e.g. your level of income, expenses, liabilities, occupation, length of employment, etc. In such situations, you have the right to object to the processing of your data for marketing purposes.



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