

## U.S. PRIVACY STATEMENT

This Privacy Statement is intended to inform you about the information that our Controlled Affiliates in the U.S. may collect about you, how we use that information, and with whom that information may be shared.

### Categories of Personal Information We Collect

When you interact with us in person, over the phone, in writing, electronically, or through a third party or any of our global affiliates, we may collect a variety of information that we maintain in a manner that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you (“**Personal Information**”). This Personal Information may belong to one of the following categories:

- Identifiers such as a real name, business name, alias, mailing address and physical address, unique personal identifier, online identifier, Internet Protocol address information, email address, account name, date of birth, government-issued (federal or state) identification and number, or other similar identifiers
- Characteristics of protected classifications under applicable law, such as gender, race, ethnicity, national origin, citizenship, marital status, or military status
- Professional or employment-related information, such as business entity information, professional affiliations, or employment history
- Education information, such as education history or degrees obtained
- Commercial information, such as business needs and operational information, records of personal property, products or services purchased, obtained, or considered, payment history, or other purchasing or consuming histories or tendencies
- Biometric information
- Geolocation data
- Internet or other electronic network activity information, such as browser type, operating system, browsing history, search history, user login and authentication data, and information regarding your interaction with a website, application, or advertisement
- Electronic, audio, visual, or similar information, such as records of calls to or from us
- Any other categories of personal information under applicable law, such as financial information, identity verification information, banking information, or credit information
- Inferences drawn from any of the categories listed above

### Sources of Collected Personal Information

We may collect your Personal Information from the following sources:

- You or those authorized to provide your Personal Information on your behalf, including via your transactions with us or as collected through your browser or device when you visit our website or use our applications
- Third parties, including but not limited to, affiliates, joint venture partners, other related parties, manufacturers and vendors, dealers and distributors of goods or services you finance with us, business partners, credit bureaus, employee benefit providers, and suppliers who provide goods and services to us

- Public records
- From equipment you finance with us – we take reasonable steps to destroy Personal Information from equipment you finance with us, though we may collect information about equipment usage if it cannot reasonably identify, relate to, describe, be capable of being associated with, or linked, directly or indirectly, to you or your household

When you visit our website or use our applications, we may automatically collect information using cookies, pixel tags, web beacons, and other similar or related technologies. Some of this information is not capable of identifying you but some information can be associated with you, your browser, or your device. We may have relationships with third-party advertising companies to help track and report on usage of our website and applications. These advertising companies may place cookies on your device to display targeted advertisements to you.

### **Use of Collected Personal Information**

We may collect, use, process, or disclose your Personal Information for the following purposes:

- Performing services on your behalf, processing your requests, fulfilling our obligations to you, assessing your eligibility for our products and services, verifying your identity and information, completing transactions for which your information was collected, maintaining or servicing your accounts, providing customer service, and communicating with you, or providing other goods or services you requested or that are reasonably anticipated within the context of our ongoing business relationship with you
- Advertising or marketing additional products and services to you that are related to products and services you request or that are offered by us, our affiliates, or a nonaffiliated third party
- Administering promotions, surveys, pools, sweepstakes, and contests
- Providing employment benefits and other employment-related services
- Conducting audits, internal research, product quality, safety, and development, risk modeling, data analysis, demonstration purposes and other solely internal uses that are reasonably aligned with your expectations based on your relationship with us or the context in which you provided your information to us
- Debugging to identify and repair errors that impair existing intended functionality
- In connection with securitizations, syndications, or loan or lease participations
- Facilitating the sale, transfer, merger, reorganization, or other change to a business line or legal entity
- Detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Processing privacy rights requests
- Investigating fraud
- Handling current or prospective legal claims
- Complying with all local, state, federal, and international laws and other legal and regulatory requests and obligations

## **Disclosure of Collected Personal Information**

We may share your Personal Information on a confidential basis with our affiliates, joint venture partners, other related parties, manufacturers and vendors, dealers and distributors, business partners, credit bureaus, employee benefit providers, suppliers, and other third parties for all of the purposes described above.

We may also disclose your Personal Information to third parties if it cannot reasonably identify, relate to, describe, be capable of being associated with, or linked, directly or indirectly, to you or your household.

We do not sell your Personal Information to third parties.

## **Cross-Border Transfers of Collected Personal Information**

We do business in multiple locations throughout the U.S. We also have affiliates located in various countries throughout the world. Your Personal Information may be accessed, processed, and transferred to affiliates and other third parties in the U.S. and elsewhere in the world for the purposes described in this Privacy Statement.

## **Links to Third-Party Websites**

Our website may include links to blogs, social media, and other third-party websites. These third-party websites may have their own privacy policies and terms of use and are not controlled by this Privacy Statement.

We are not responsible for the privacy or security of any information you provide to a third-party website or the information practices used by any third-party website, including links to any third-party site from our website. We make no representations, express or implied, concerning the accuracy, privacy, safety, security or the information practices of any third-party website. The inclusion of a link to a third-party website on our website does not constitute any type of endorsement of the linked website by us.

## **Do Not Track Disclosures**

Various third parties are developing or have developed signals or other mechanisms for the expression of consumer choice regarding the collection of information about an individual consumer's online activities over time and across third-party websites or online services. Currently, we do not monitor or take any action with respect to these signals or other mechanisms.

## **Policy on Protection of Social Security Numbers**

We collect Social Security Numbers for lawful purposes in accordance with applicable law, including to process financing documents, and have established a policy to protect and maintain the confidentiality of Social Security Numbers. We implement commercially reasonable administrative, technical, and organizational safeguards and controls designed to protect and secure Social Security Numbers, prevent unlawful disclosure, and protect against unauthorized access. In addition, access to Social Security Numbers is limited to authorized employees and third parties with a need to know and who are under an obligation of confidentiality. We do not share your Social Security Number with third parties for advertising or marketing purposes.

## **How We Protect Collected Information**

We are committed to protecting your Personal Information. We have implemented and maintain appropriate and reasonable security procedures and practices appropriate to the nature of the information to protect your Personal Information from inadvertent or unauthorized access, exfiltration, theft, or disclosure.

However, no electronic transmission of data can be guaranteed as completely secure. As a result, we cannot guarantee or warrant the security of any information you transmit to or receive from us.

## **Notice to Minors**

Our website is not designed to attract minors and is not directed at or intended to be visited by minors. No visitor to our website who is a minor or under the age of eighteen (18) should provide any Personal Information to us. If you are a minor, do not visit our website and do not send any Personal Information to us.

In the event that we become aware that we have collected Personal Information from a child under the age of thirteen (13), we will take steps to dispose of that information as permitted by law and in accordance with the Children's Online Privacy Protection Act and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of thirteen (13) has provided us with Personal Information without your consent, please contact us at [usprivacyoffice@leasedirect.com](mailto:usprivacyoffice@leasedirect.com).

## **Updates**

This Privacy Statement was last updated on March 23, 2020. We may update this Privacy Statement from time to time. We will post the updated Privacy Statement on our website.

## **How to Contact Us**

If you have any questions or comments about our Privacy Statement, please contact us at [usprivacyoffice@leasedirect.com](mailto:usprivacyoffice@leasedirect.com).