

Based on Art. 13 para. 1 and para. 2 as well as Art. 14 para. 1 and para. 2 of the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 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 95/46/EC (hereinafter: "General Data Protection Regulation" or "GDPR") applied as from 25 May 2018, we would like to inform you about the manner and objective of your personal data processing (hereinafter: "the data"), and also about your rights in connection with the data protection.

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

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

- in writing, any correspondence to be posted to the address: Santander Leasing S.A., ul. Kolorowa 8, 60-198 Poznań
- by phone, at the phone number: +48 61 850 35 25,
- by electronic mail, at the e-mail address: kontakt@santanderleasing.pl and in other ways indicated on the website: www.santanderleasing.pl

The Company has appointed a data protection officer who may be contacted in writing, any correspondence to be posted to the address: Santander Leasing S.A., ul. Kolorowa 8, 60-198 Poznań, with a note: "Data Protection Officer", and by electronic mail at the e-mail address: iod@santanderleasing.pl.

2. Why, for what purpose and on what legal basis do we process your data?

We process your data in accordance with the provisions of GDPR and the Polish legal regulations regarding personal data protection.

We do that because we fulfil:

- our contractual obligations and take steps at the request of the data subject prior to entering into a contract (Art. 6 para. 1 item b GDPR),
- legal obligations (Art. 6 para. 1 item c GDPR),
- tasks carried out in the public interest (Art. 6 para. 1 lit. e GDPR).

What does that mean?

- The data are processed in order to carry out the tasks involved in concluding or implementing a contract, in connection with which the data were provided to the Company, e.g. in order to carry out a recruitment process, enter into a relationship under an agency agreement, cooperation agreement or other business contracts, as the case may be.
- The data are processed so that the Company can carry out its leasing or lending activities and provide other services within the framework of contracts concluded with its customers or in order to carry out tasks performed at the customer's request before or in connection with concluding a contract.
- As a Company, we have to meet a number of legal obligations resulting from e.g. the regulations on counteracting money laundering and terrorist financing, fiscal legislation, labour law and social security regulations, and other regulatory requirements. Moreover, we may be obliged to carry out tasks in the public interest, in particular with regard to counteracting criminal offences. If need be, we will be processing your data in order to meet any requirements imposed by, inter alia, the above mentioned regulations.
- Moreover, your data may be processed for purposes such as: assessing your creditworthiness, credit risk analysis, verifying the identity of customers and persons representing them, fulfilling the obligations connected with monitoring the repayments timeliness and with risk management in the Company, fulfilling the obligations resulting from the fiscal legislation.

Moreover, it is important that:

- we process the data, when it is necessary, for the purposes of the legitimate interests pursued by the Company or by a third party (Art. 6 para. 1 item f GDPR).

This is what we do e.g. when we process the data of the persons acting for and on behalf of our customers and contracting parties, when we act to prevent criminal offences committed to the detriment of financial institutions, banks, credit institutions, loan institutions, payment institutions and their customers, in order to ensure IT security for the Company; in order to examine the customers' satisfaction, pursue claims and defend against claims, in direct marketing of the Company's products and services, for internal administrative purposes of the Company, such as: employee-related issues or issues connected with cooperation, analysis of a loan portfolio, preparing the statistics and internal reporting in the Company and within the Santander Group to which the Company belongs.

- we process your data on the basis of your consent (Art. 6 para. 1 item a GDPR), granted for specific purposes (e.g. sending marketing data within Santander Group).

The consent may be withdrawn at any time. Withdrawing the consent has no effect on the compliance of the processing of your data by the Company:

- **until the withdrawing of the consent or**
- **in the circumstances when the Company processes your data on a basis other than your consent.**

3. Who may we transfer the data to?

Your data may be made available to other recipients in order to enable implementation of a contract concluded with you, in order to carry out a legal obligation imposed on the Company, based on your consent or for the purposes resulting from the legitimate interests of the controller or a third party.

Recipients may include in particular: authorised employees of the Company and other persons authorised by the Company, the Financial Supervisory Authority, the Ministry of Finance, including the General Inspector of Financial Information, Biuro Informacji Kredytowej S.A. [credit reporting agency], the European Investment Bank, clearing houses, the Polish Leasing Association, credit reference agencies, banks, credit and payment institutions, participants of payment systems, tax offices, labour law and social security institutions, national insurance institutions and other institutions authorised to receive your data under applicable legal regulations, entities from the Santander and Santander corporate groups.

The data are also transferred to entities that are commissioned by the Company to process data and to persons authorised by them, where such entities process the data under a contract concluded with the Company and in strict compliance with the Company's instructions and on the condition of keeping business secrets and insurance confidentiality (i.e. specific obligations to protect information, resulting from the relevant legal regulations). Entities carrying out tasks for and on behalf of the Company include service providers, in particular in the area of banking, IT, debt collection, legal advice, insurance (including insurance agency services), as well as agency, intermediary and marketing services.

4. Will your data be transferred to a third country (outside the European Union)?

The data may be transferred to recipients in countries outside the European Union ("third countries"):

- if it is necessary to carry out a contract concluded between you and the Company or to take actions before concluding such a contract so as to be able to conclude it,
- in the course of using by the Company any IT infrastructure (cloud computing, electronic mail).

In case the data processing involves transferring the data outside the European Union, such a transfer will be effected using the standard contractual clauses or Privacy Shield regulations approved by the European Commission, in order to ensure an appropriate level of personal data protection required by the regulations.

In other situations, your data may be transferred to third countries in the cases stipulated in GDPR. To obtain a copy of the data transferred to a third country, please request it from the data protection officer. The data may be transferred to a third country also upon obtaining your consent. Pursuant to the above, your data will be transferred to a third country on the basis of Art. 49 para. 1 item a and Art. 49 para. 1 item b GDPR.

¹ Santander Group means Santander Bank Polska S.A. as well as the entities related by equity or in terms of organisation, including any entities to be established in future. The list of entities is published at www.santander.pl.

5. How long will your data be processed (stored)?

Your data will be processed for a period that is necessary for achieving the processing objectives indicated in item 2 i.e.:

- with regard to implementing a contract concluded with the Company – until its completion, and after that time for a period required by the legal regulations or necessary to handle any claims;
- with regard to fulfilling any legal obligations imposed on the Company in connection with running its business activity and implementing the contracts concluded by the Company – until the time of fulfilling the duties by the Company;
- with regard to processing done exclusively on the basis of your consent – until the time of prompt removal of the data, effected in response to a request filed by you;
- until the time of fulfilling any legitimate interests of the Company, being the basis of the processing, or until the time of submitting by you an objection to such processing, provided that there are no legitimate bases for further processing of the data.

6. What rights are you entitled to in order to ensure appropriate protection of your data?

You have a right to:

- request access to your data, and also request their rectification, restriction of processing or erasure;
- withdraw, at any time, the previously granted consent for personal data processing within the scope to which the consent pertains, however, 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.
- request a relocation of the data provided by you to the Company, processed in order to conclude and implement the contract or processed under your consent. A relocation means that the Company provides you with your data in a structured, commonly used format that is machine-readable, and you are entitled to send them to another data controller, as long as it is technically possible, however, this right does not extend to the data which are a business secret of the Company;
- file a complaint with supervisory authorities (in the Republic of Poland this function is performed by the President of the Personal Data Protection Office), if you think that processing of your data infringes the regulations, including GDPR.

Moreover, you are entitled to object, at any time, to your data being processed by the Company:

- on grounds relating to your particular situation, when the Company processes the data for purposes resulting from legitimate interests (Art. 21 para. 1 GDPR);
- for direct marketing purposes, which includes profiling for marketing purposes, to the extent that the data processing is related to such direct marketing (Art. 21 para. 2 RODO).

For the purposes of implementing your rights, the Company may request additional information necessary to confirm your identity.

7. Are you obliged to provide your data?

To the extent your data are processed in order to carry out the requested tasks or to conclude and implement a contract with the Company, providing your data is a condition for carrying out the requested actions or concluding the contract. Provision of your data is voluntary, however, it is necessary for the purposes of performing the requested actions or to conclude and implement a contract with the Company. Additionally, where applicable, under the regulations on counteracting money laundering and terrorist financing, we are particularly required to identify you and to gather and record your data. To enable us to fulfil the duties, the regulations require that we are provided with necessary information or documentation and that we are promptly notified of any changes. If you don't provide the Company with the necessary information or documents, the Company will be unable to perform the requested actions or conclude and implement contracts and provide services.

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

- Most of the data processed by the Company comes directly from the interested entity, particularly the customer;
- Some of the data may come from, inter alia: credit reference agencies, Biuro Informacji Kredytowej S.A. [credit reporting agency], the Polish Bank Association, the Electronic System of Land and Mortgage Registers, from entities who obtained your consent to provide data, from persons representing you (also on the basis of granted authorisations), from public records and registers; these sources also pertain to data such as: customer identification data, contact data, socio-demographic data (e.g. data regarding employment, education, marital status), data concerning any existing liabilities;
- Some data – this regards the data of entrepreneurs – are obtained by us also from other public sources, i.e. from: the National Court Register, Central Register and Information on Economic Activity or similar sources located in other countries and from private entities specialised in gathering and sharing information on entrepreneurs;
- In the case of the data of persons representing entrepreneurs or otherwise acting on their behalf, we obtain the data both from the above mentioned sources and from the entrepreneurs themselves.

9. To what extent do we use automatic decision-making, including profiling?

Your data may be processed automatically, which may be connected with automatic decision-making. This regards:

- Assessing your creditworthiness for the purposes of concluding a contract with the Company, when the assessment is based on: the data provided to the Company representative or declared in an application for any products or services offered by the Company; information about you held by the Company in connection with your use of any products and services; information obtained in the course of the credit analysis (inter alia, reports obtained from Biuro Informacji Kredytowej S.A. [credit reporting agency] and any credit reference agencies and interbank lists of bad debtors). Verification is effected on the basis of a defined set of rules and algorithms in accordance with the specified process of creditworthiness assessment, approved by the Company. The assessment may result in: automatic consent to entering into the contract, automatic refusal to enter into the contract, or a need for the Company to make an individual decision.
- Assessing fulfilment of the conditions necessary for the Company to provide specific services to you, when the assessment is made on the basis of the data held by the Company or obtained from other entities, regarding e.g. active use of specific services, or inflows of cash into bank accounts. The conditions regarding the services are specified on an individual basis in the documentation connected with the specific service, e.g. the agreement, rules or principles of providing such services. The assessment may result in: automatic consent to providing the services, automatic refusal to provide the services or a need for the Company to make an individual decision.
- Assessing the risk of money laundering, terrorism financing and other criminal offences, when the assessment is made on the basis of the data provided to the Company representative or contained in the documents presented for the purposes of concluding the contract or filing an order to perform a transaction, on the basis of established (economic, geographic, factual, behavioural) criteria. The assessment may result in: automatic qualifying to the appropriate risk group; where qualifying to the group of unacceptable risk may lead to a refusal to enter into a relationship. In the context of this assessment, data analyses are carried out, e.g. regarding business relationships, which also serves your security.

Moreover, your data may be processed semi-automatically in order to examine some personal aspects (profiling). This serves the purpose of providing you with customised information on products or services. To that end, we also use analytical tools that ensure the Company an appropriate level of information (e.g. market research or public opinion poll). For example, the research may be based on the following factors: income level, expenses, any existing liabilities, other financial data, occupation, employment duration, professional experience, etc.