

Information on data processing

(according to Articles 13 and 14 GDPR)

The following information serves to inform you about the processing of your personal data and the data protection claims and rights to which you are entitled. This information does not change your contractual or legal rights or obligations. The content and scope of the data processing are largely based on the products and services you have contractually agreed to or requested.

1. Who is responsible for data processing and who can I contact?

Your data is collected and processed by:
RBI Leasing GmbH
Mooslackengasse 12
1190 Vienna
E-mail: datenschutz@rl.co.at

You can reach the data protection officer appointed by us at:
Mag. Daniela Bollmann, LL.M.
Am Stadtpark 9
1030 Vienna
E-Mail: datenschutzbeauftragter@rbinternational.com
Telefon: +43-1-71707-8603

2. Which data do we process and from which sources does this data come?

We process personal data that we receive from you directly, data that we have legitimately received from business information services (CRIF GmbH), address services, creditor protection associations (KSV 1870), data from publicly accessible sources (e.g. company register, register of associations, land register, media), as well as data legitimately received from other companies affiliated with us.

We process your personal and contact details (such as name, address, e-mail, date of birth), household data and family circumstances (such as the number of children and other dependents), identification data from public authorities (such as ID card data), creditworthiness data (such as the type and amount of income), financial identification data (such as your bank details and customer numbers), insurance data, image and sound recordings (such as recordings in the course of an online identification), data on the business relationship, data on marketing and sales, AML (Anti Money Laundering) and compliance data, if applicable, Tax data (such as VAT numbers) and, if applicable, electronic log and identification data (such as your electronic signature, logging data or cookies), as well as other data comparable to the categories mentioned.

3. What is the purpose and legal basis of our data processing?

We process your personal data in accordance with the provisions of the European General Data Protection Regulation (GDPR) and the Austrian Data Protection Act 2018 so as to ...

a) Fulfill contractual obligations (Art. 6 para. 1 lit. b GDPR):

The processing of personal data (Article 4 No. 2 GDPR) takes place

- for the provision of leasing transactions including hire purchase and fleet management services and may include the preparation of offers, conclusion and management of contracts, as well as the administration and sale of financing objects and fleets and the associated vehicles;
- for the conclusion and arranging of insurance policies;
- to process funding applications;
- in particular for the implementation of our contracts with you and the execution of your requests, as well as for the implementation of pre-contractual measures.

The specific details on the purpose of data processing depend on the respective product and can be found in the respective contract documents and terms and conditions.

b) Fulfil legal obligations (Art. 6 Para. 1c DS-GVO):

Processing of personal data may be necessary for the purpose of fulfilling various legal obligations (e.g. from the Banking Act, Financial Market Money Laundering Act, Consumer Credit Act, etc.) as well as regulatory requirements (e.g. the Austrian Financial Market Authority, etc.) to which, as an Austrian financial institution our company is subject. Examples of such cases include:

- Legally prescribed measures to combat money laundering and the financing of terrorism, combating fraud and compliance with financial sanctions and, if necessary, obtaining the necessary information and making reports (e.g. reporting to the Austrian money laundering agency in certain suspected cases);
- Credit check (scoring) when financing is approved – In this scoring, the default risk of those seeking financing is evaluated with the help of statistical comparison groups. The calculated "score value" is intended to enable a forecast to be made as to the probability of a requested financing being repaid. To calculate this "score value", your master data (marital status, number of children, duration of employment, employer), information on general financial circumstances (income, assets, monthly expenses, amount of liabilities, collateral, etc.) and payment history (proper funding repayments, reminders, credit bureau data). If the default risk is too high, the application for financing will be rejected;
- Maintenance of statutory accounting and business records;
- Internal and external company reviews, such as reviews by the Financial Market Authority, auditors or internal auditing.

c) Protect legitimate interests (Article 6 (1) (f) GDPR) in general:

If necessary, in the context of balancing interests in favour of our company or a third party, data processing can take place beyond the actual fulfilment of the contract to protect our legitimate interests or those of third parties. Examples of data processing to protect legitimate interests include:

- Consultation of, and data exchange with, business information services and creditor protection associations (e.g. CRIF GmbH and Kreditschutzverband 1870);
- General information mails and newsletters on services and products and related market information;
- Credit and risk assessments and calculation of rating classifications and probabilities of default and other risk management activities;
- Testing and optimization of processes for needs analysis and direct customer contact;
- Telephone recordings (for quality assurance measures or in the event of complaints);
- Measures for business management and further development of services and products;
- Measures to protect employees, customers, and the property of our company;
- Measures to prevent and combat fraud, and to combat money laundering, terrorist financing and property-endangering crimes;
- Measures for debt collection and legal prosecution;
- Assertion of legal claims and defence in legal disputes;
- Ensuring the IT security and IT operations of our company;
- Prevention and investigation of criminal offenses;
- Joint group risk management.

These processing activities serve to ensure the diligent management of our company.

d) Protect legitimate interests (Art. 6 Para. 1 lit. f GDPR) in the marketing of our services:

The evaluation of your data processed by us for the following purposes:

- To provide you with or transmit information and offers from our company that are suitable for you, and to develop services and products that are tailored to your interests and life situation, based on our legitimate interest in marketing our services. The evaluation of the data for this purpose takes place in an anonymous form and only as long as you have not objected to it.

The following data, which we have collected ourselves or which you have made available to us, can be evaluated for this purpose:

Personal data / master data

Gender, title, name, date of birth, country of birth, citizenship, marital status, education, occupation, employer, identification data such as driving license data, income data, address and other contact data such as telephone number or e-mail address and postal address, family relationships (without personal data of these persons), number of people in the household, internal ratings such as our assessment of the income and expenditure situation, and the asset and liability situation

e) Be within the scope of your consent (Art. 6 para. 1 lit. a DSGVO)

In some cases we need your consent so that we can carry out data processing. Such consent is given in separate declarations of consent and not in these data processing instructions. If you give us your consent to data processing for specific purposes, the data will also be processed for the purposes and to the extent contained in your declaration of consent. Such consent can be revoked by you at any time with effect for the future.

4. Who receives my data?

We forward your data, insofar as is necessary, to ...

- a) Insurance companies to insure against risks in connection with your leasing, hire purchase contract, your financed object or the managed fleet;
- b) Current and potential risk partners, liability partners and securities providers (e.g. guarantors, lien holders) for risk assessment and for the fulfillment of information obligations;
- c) Re-financers to assess any collateral provided and to fulfill disclosure obligations;
- d) Creditor protection associations (Kreditschutzverband 1870 Holding AG) and credit agencies (CRIF GmbH) for data exchange in connection with risk assessments, anti-money-laundering, terrorist financing, fraud prevention and default in payment;
- e) Securitization companies, where applicable, to carry out the securitization of claims from your business relationship with us, whereby in this context there is also a transfer to rating agencies, security or data trustees, service providers and buyers of securities;
- f) The European Investment Bank and the European Investment Fund, where applicable, for the assessment, granting and processing of subsidies and for reporting to the competent authorities;
- g) Sales cooperation partners and their authorized dealers, where applicable, so as to carry out evaluations in connection with sales cooperations;
- h) Raiffeisen Bank International AG, Vienna, the Austrian regional Raiffeisen banks and Raiffeisen banks for risk assessment and to combat money laundering and terrorist financing and fraud prevention;
- i) Group companies, where applicable, for risk assessment and group management;
- j) Service providers who provide services for us in connection with the conclusion and processing of the business relationship (such as First Leasing Service Center GmbH, Raiffeisen-Leasing Gesellschaft mbH) and processors who process your data for us upon our request;
- k) Dealers, suppliers and service providers for the provision of services in connection with the financed object;
- l) If necessary, debt collection/intervention agencies for debt collection and the provision of related services;
- m) Authorities, at their request, insofar as they are legally authorized to do so, or if there are reporting obligations.

5. Is data transferred to a third country or an international organization?

Data will only be transferred to third countries (countries outside the European Economic Area - EEA) if this is necessary for the execution of your requests or is required by law, or if you have given us your consent to do so.

6. How long will my data be stored?

We store your data during our business relationship (from the initiation, through processing to the termination of a contract) as well as in accordance with the statutory storage and documentation obligations, which result from the German Commercial Code (UGB), the Financial Market Money Laundering Act (FM-GwG) and the Federal Fiscal Code (BAO).

In addition, the statutory limitation periods, which according to the General Civil Code (ABGB), can be three years in most cases but up to 30 years in certain cases, must also be taken into account with regard to the storage period.

7. Am I obliged to provide my data?

As part of the business relationship, you must provide the personal data that is required for the establishment and implementation of the business relationship and that we are legally obliged to collect. If you do not provide us with this data, we will usually have to refuse to conclude the contract or will not be able to carry out an existing contract, and hence cancel it. However, you are not obliged to give your consent to data processing with regard to data that is not relevant for the conclusion of the contract or the fulfilment of the contract, or that is not required by law and/or regulation.

8. What data protection rights do I have?

In accordance with the General Data Protection Regulation, you have the right to information about the personal data that we process from you; to the correction, deletion or restriction of the processing of this data; a right to object to this data processing and a right to request the transfer of the data you have provided.

If you believe that we are infringing your rights when processing your data, you have the right to lodge a complaint with the Austrian Data Protection Authority, Barichgasse 40-42, 1030 Vienna, www.dsb.gv.at. If you live or work in another member state of the European Union, you can also lodge your complaint with the supervisory authority responsible for data protection there.

9. Is there automated decision-making?

In principle, we do not use fully automated decision-making to establish and implement the business relationship, in accordance with Article 22 GDPR. With respect to the online purchase of products, the online purchase may be automatically rejected if the information you provide does not meet the requirements defined for the online purchase. In such cases, please contact our customer service. We will inform you separately if we use these procedures in other individual cases, if this is required by law.

10. Information on the consumer credit register

We report the following to the consumer credit register of the credit protection association of 1870:

- conclusion or rejection of a leasing contract with a natural person living in Austria,
- the assumption of liability or a guarantee by such a person, and
- payment arrears from such a leasing contract.

The consumer credit register is available to banks, lending insurance companies and leasing companies based in the European single market for the purposes of creditor protection and risk minimization. Data from the consumer credit register is only passed on to banks, lending insurance companies and leasing companies based in the European single market, insofar as they have a legal obligation to correctly assess the credit risk posed by a credit applicant.

You have the right to access information about the personal data that we process from you; to the correction, deletion or restriction of the processing of this data; a right to object to this data processing and a right to request the transfer of the data you have provided. You can assert these rights to Kreditschutzverband von 1870, Wagenseilgasse 7, 1120 Vienna, email: kvs.sa@kvs.at.

The Credit Protection Association of 1870 is responsible for the operation of the consumer credit register and data protection law processor for the transmission of data to the consumer credit register.

You are also entitled to lodge a complaint with the data protection authority. If you live or work in another member state of the European Union, you can also lodge your complaint with the supervisory authority responsible for data protection there.

11. Information on cooperation with CRIF GmbH

You will be informed that your application/order data that you make available to us will be sent to CRIF GmbH, Vienna, to check your identity, your creditworthiness and to prevent fraud. You can find more information on the CRIF GmbH website at www.crif.at.

12. Customer mailings

In order to keep you informed about the products and services you have applied for or purchased from us, we will send you information about these products and services by post or e-mail, unless you object or have objected to this. We will use your name and your contact details, which you have provided to us as part of your business relationship with us, for these communications. The legal basis for data processing is our legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR. You have the option of informing us of your objection to this at any time, e.g. by sending an email to produktinfo@lsc.co.at.

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