

# Information Regarding Personal Data and How it is Processed



## **1. Data Processing and Responsibility**

By 'processing', we mean every operation we carry out on data, such as collecting, saving, storing, consulting, using, sending, deleting, archiving, and destroying data.

D'Ieteren Automotive SA/NV, head-quartered at Rue du Mail, 50, 1050 Brussels, is the entity responsible for processing your personal data (the Data Controller). Any questions you may have on this matter can be sent to us by mail at the above address or by e-mail at the following address: [customercare@dieteren.be](mailto:customercare@dieteren.be).

## **2. What is D'Ieteren Automotive?**

D'Ieteren Automotive SA/NV imports and distributes Volkswagen, Audi, SEAT, Cupra, ŠKODA, Bentley, Lamborghini, Bugatti, Porsche, RIMAC and Microlino vehicles – as well as spare parts and accessories – across Belgium. The company manages a network of independent dealers throughout the country and owns sites located chiefly on the Brussels-Malines-Antwerp axis (Sopadis s.a.).

For D'Ieteren Automotive, your vehicle is not just a product: it is a suite of mobile and connected services supporting your lifestyle. D'Ieteren Automotive has pioneered the development of new mobility services, collaborating for example in the launch of micromobility solutions such as Microlino (D'Ieteren Micromobility s.a.) and of shared and multi-mode mobility services such as Poppy or mbrella (Lab Box s.a.).

D'Ieteren Automotive has various subsidiaries:

- Sopadis (which in turn owns subsidiaries: Autonatie, Kronos, AC Bornem, Rietje, ACM, Porsche Centre Liège, Bruynseels, ACP, Porsche Centre Paal, Porsche Centre Mechelen, Don Bosco Garage, Thuy, Overijse Automotive, D'Ieteren Centers, PC Antwerp and PC Brussels)
- Wonderauto NV
- Wondergroup NV
- Lab box (which also has subsidiaries: EDI, Poppy, skipr, MyMove, Husk, Ush, Lizy, mbrella, mobvious, Mob box, Joule & Taxis Verts)
- D'Ieteren Micromobility s.a.

### **3. What personal data do we process?**

By 'personal data', we mean any information regarding any identified or identifiable person.

We process the personal data that you send us – such as user data (e.g. first and last name, sex, language, address, telephone number, email address, age, bank account number and similar information, copies of ID cards, hobbies), technical data regarding your vehicle (e.g. your chassis number, vehicle numberplate), location data where applicable (e.g. if your vehicle is equipped with a geolocation system and you have consented to this service), professional contact information and workplace information (e.g. last name, first name, mailing address, e-mail address, landline or mobile phone number, department, cost centre, duties), IT information (e.g. user ID, rights, login times, workstation name, IP address) – and the data we collect when you use our services (e.g. your vehicle's mileage, how often you visit our dealerships, how often you visit our websites).

We only use automatically processed data to make decisions when this is necessary to enter into or perform a contract (e.g. when issuing a loan) or if you have provided consent.

We will only carry out profiling if you have provided consent. To this end we will therefore request your specific consent. We may then suggest offers and personalised services by combining the data we have about you and/or that we obtain by analysis of our systems (e.g. analysing your visits to our workshops/garages so as to notify you of the best time to service your vehicle ('predictive maintenance')).

We do not process 'sensitive' data relating, for example, to race or ethnicity, political opinions, religious or philosophical convictions, sexual activity and/or orientation, or your health. If it were necessary to process such data, we would only do so after having received your express permission, and only for specific purposes that we would explain to you in advance, or if it were necessary to process it for the purposes of labour law, social security, preventive medicine, or workplace medicine.

### **4. For what purposes and on what basis do we use the data that you send us?**

We use the personal data that you provide for a variety of purposes, such as:

- Managing our **contractual** relationship and the associated services, e.g.
  - using your telephone details to notify you that requested work on your vehicle is complete
  - using your personal data to prepare and issue invoices, purchase orders, etc.)
- For purposes to which you have given us your **consent**, e.g.
  - using your email address if you have opted to receive newsletters on our products via email
  - to offer you personalised services, based on your habits only if you have given us specific permission to do so (e.g. suggesting you visit one of our garages based on your vehicle's behaviours, your mileage and the frequency of your visits to our workshops) (for more detail see section 5 below)
  - using your surname, first name and digital contact details in providing support to you via 'chats' on our websites
- To **satisfy legal or regulatory obligations** with which we are required to comply. E.g.:
  - sending your personal data to the official Belgian data bank (Banque Carrefour) for vehicles when we supply you with one of our vehicles;

- providing the Authorities with your personal data when we are required to do so for a legal investigation
- When we have a **legitimate interest** in doing so, while balancing this interest with protecting your privacy, e.g.
  - in the context of fighting and preventing fraud,
  - to improve our products and services, particularly in the context of feedback requests and satisfaction surveys
  - to remind you of an appointment you made when your vehicle was serviced
- When processing your data is essential to protect your safety and your **vital interests**, e.g.
  - particularly in the context of recalls by order of the authorities and relating to the safety of your vehicle
- Anonymously, or using pseudonyms, for commercial purposes with no link your personal data (e.g. for statistical analysis of visit frequency to our workshops/garages)
- Jointly with other data controllers when agreements have been made to that effect (e.g. to provide you with servicing for your vehicle when you are travelling and leave your vehicle with a parking company)
- Using your surname, first name, address and email as collected for a competition, for the purpose of informing you of the result;

D'Ieteren Automotive does not carry out processing that might be characterised as an automated decision process. Automated decision making is the ability to make decisions using technology and without human intervention.

We may sometimes need to transfer your data to other companies within our corporate group (sister companies, subsidiaries like Lab Box, Wondercar, D'Ieteren Lease, Volkswagen D'Ieteren Finance or D'Ieteren Micromobility) for the above purposes.

We will not transfer it to third parties, except:

- To members of the distribution network for the makes that we distribute (manufacturers and their associated finance companies, dealerships);
- When we are legally required to do so (e.g. the Credit Register of the National Bank of Belgium, when issuing a loan);
- When we are legally authorised to do so (e.g. if we transfer our rights and obligations to a loan, or if we transfer all or part of our business)
- To subcontractors, when this is needed to provide our services (e.g. digitally archiving invoices)
- To keep it up to date (providing it to BPost when mail is returned following a change of address)
- When you provide prior consent

If processing the data via a subcontractor requires it to be transferred outside of the European Union, we will ensure that your data is protected in accordance with applicable European Union law.

We ensure that any third party to whom we transfer your data processes it, as we do, with the highest standard of security, with every necessary safeguard in place to protect it.

As noted in section 2 above, D'Ieteren Automotive has a number of subsidiaries:

- Sopadis (which in turn has subsidiaries: Autonatie, Kronos, AC Bornem, Rietje, ACM, Porsche Centre Liège, Bruynseels, ACP, Porsche Centre Paal, Porsche Centre Mechelen, Don Bosco Garage, Thuy, Overijse Automotive, D'Ieteren Centers, PC Antwerp and PC Brussels)
- Wonderauto NV
- Wondergroup NV
- Lab box (which also has subsidiaries: EDI, Poppy, skipr, MyMove, Husk, Ush, Lizy, mbrella, mobvious, Mob box, Joule & Taxis Verts)

D'Ieteren Micromobility s.a.

In this context we transfer and may share your personal data with our subsidiaries. The table below shows the various types of processing, their purpose, the applicable legal basis and categories of personal data involved:

PROCESSING TYPE	PURPOSE	DATA TYPE	LEGAL BASIS
Sharing contact data collected at one operator/dealership with our other operators/dealerships and D'Ieteren Automotive	Ensuring data quality within the D'Ieteren Automotive ecosystem	Contact data	Contractual
Sharing vehicle data with our operators/dealerships and D'Ieteren Automotive	Ensuring proper servicing/repair of the vehicle	Technical information/data	Contractual
Sharing contact and vehicle data collected at an operator/dealership with a D'Ieteren Automotive subsidiary	Ensuring data quality and proper tracking when a subsidiary's products and services are bought	Contact data and technical information/data	Contractual Legitimate interest

## 5. More information about consent

D'Ieteren Automotive and its subsidiaries obtain consent for two different levels of processing:

- **A standard consent** is obtained for our general business. By this we mean communication by newsletter, invitations to take part in events, information about new models of vehicle we are distributing, promotions, and so on. You will only receive communications on the basis of information we have obtained directly from you (and so not derived or calculated). For example: if you have requested a Volkswagen Golf catalogue and provided a standard consent, you will receive information about Volkswagen vehicles.
- If you give a standard consent, you will also have the option of giving **a personalised consent**. This personalised consent means that D'Ieteren Automotive and the other beneficiaries that you select may create a customer profile for you on the basis of all the information we hold, so as to be able to send you personalised communications.

Taking the above example again: if you have requested a Volkswagen Golf catalogue and provided a personalised as well as a standard consent, you will receive the Volkswagen newsletter. On the basis of your customer profile we will, for instance, make a 'best guess' at the moment when we should send you an email about the new Golf. Personalised consent means you will receive communication that is specific and based on your profile.

## 6. How do we protect your data, and how long do we store it?

We implement all technical and organisational measures needed to protect your personal data.

Your data is stored for the time needed for the processing associated with the purpose for which it was collected. For example:

- 30 days for your contact details when you take part in a live 'chat' on our websites;
- 6 months when preparing an offer for the purchase of a vehicle or an online specification;
- 1 year for your contact details when you test drive one of our vehicles, in case there are any fines to be paid;
- 1 year for your contact details when you register at reception in one of our showrooms;
- 7 years for accounting/tax documents;
- 8 years after the end of the contractual relationship to retain evidence for disputes or claims;
- 8 years after a sales interaction with no outcome.

This time period can sometimes be longer, to comply with legal requirements or in the event of a dispute.

At the end of these storage periods, personal data is deleted or rendered anonymous or unusable.

## 7. What are your rights?

You have the following rights with regard to the personal data that we collect/that you provide:

- *Right to access and transfer your data:*  
You have the right to access all personal data that concerns you. You have the right to receive confirmation as to whether your personal data is or is not being processed, and to be informed of the purposes for which we process it, the type of data that is processed, the persons and entities who receive the data, and how long your data is stored. You also have the right to receive a copy of the personal data that you have provided, and to send it (or ask us to send it) to another entity responsible for processing personal data.
- *Right to correct/delete data – right to be forgotten*  
You have the right to ask for data concerning you to be corrected if you realise that it is inaccurate or incomplete. You also have the right to ask for your personal data to be deleted if it is no longer needed for the purposes for which it was collected. If you gave us permission to process your personal data, you have the right to withdraw this permission at any time.
- *Right to object to the processing of data for marketing purposes*  
You have the right to refuse permission for your data to be processed for direct marketing or prospecting purposes. No reason need be provided if you decide to refuse.
- *Right to limit processing*  
You have the right to limit how your data is processed when you dispute its accuracy, when you are opposed to its deletion and instead require that its processing is limited, or when - while we no longer need to process it - you have a need for it in order to assert, exercise or defend a legal right.
- *Right to file a complaint with the oversight authority*  
You may if you choose file a complaint concerning the processing of your data with the Data Protection Authority (formerly the Privacy Commission) at the following address: Autorité de la Protection des Données, Rue de la Presse, 35, 1000 Bruxelles - [contact@apd-gba.be](mailto:contact@apd-gba.be) .

You can exercise the first four rights by contacting us at the addresses mentioned in the section ‘Data Processing and Responsibility’

## 8. How to Contact Our Data Protection Officer

To ensure that the way in which we process personal data complies with applicable legislation, we have appointed a Data Protection Officer (D.P.O. - email: [DPO@dieteren.be](mailto:DPO@dieteren.be) – Address: rue du Mail, 50, 1050 Brussels).