

VVCR EUROPE PRIVACY POLICY

VVCR Europe B.V ("we") are committed to protecting and respecting your privacy and how we do this is explained below.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting the websites appearing at URL driverportal.org ("driver portal") and/or vvcr.nl (together the "website") you are consenting to the practices described in this policy.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Information you give us.** The information you give us on the driver portal may include your name and e-mail address and details about your driving history and attitudes.
- **Information we collect about you.** The information that we may collect on the driver portal includes name, e-mail address, whether online assessments have been completed, fuel consumption and damage statistics.

With regard to each of your visits to our website we may also automatically collect the following:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); assessments you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors, and fuel card suppliers) and may receive information about you from them.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- to carry out our obligations arising from any contracts we have entered into for the provision of services including (without limitation) risk management, driver profiling and driving training;
- to allow you to participate in interactive features of our services, when you choose to do so;
- to communicate with our third party platforms and service providers;

- to notify you about changes to our service;
- to ensure that content from our website is presented in the most effective manner for you and for your computer;
- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- as part of our efforts to keep our site safe and secure.

DISCLOSURE OF YOUR INFORMATION

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

We may share your information with selected third parties including:

- Business partners, suppliers, sub-contractors and other third parties involved in delivering all or part of the services requested (including without limitation provision of driver training, both theory and practical).
- Line managers, regional managers or other selected managers who require access to the information.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience. (This only applies to use of the VVCR Europe site at vvcr.nl, not the driver portal).

We may also need to disclose your information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If VVCR Europe or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use and other agreements; or to protect the rights, property, or safety of VVCR Europe, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at other locations within the European Economic Area ("EEA") and also at destinations outside the EEA.

The data may also be processed by staff operating at other locations within or outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take reasonable steps to ensure that your data is transferred in accordance with applicable data protection laws.

SECURITY

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use reasonable steps to protect the information in accordance with applicable data protection laws.

LINKS TO OTHER SITES

Our website may, from time to time, contain links to and from other websites including our partner networks, advertisers, social networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. By continuing to browse the website, you are agreeing to our use of cookies.

We may use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose. These cookies are only relevant to use of the VVCR Europe site (vvcr.nl), not the driver portal.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to make changes to this Privacy Policy and we will endeavour to post any changes on our website. Please check back frequently to see any updates or changes to our Privacy Policy

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@vvcr.nl