



# Privacy Statement

DOCKR B.V. considers the protection of personal data to be essential. We therefore process your data with the greatest possible care. With this privacy statement we inform you about how we manage personal data.

## 1. Who is responsible for processing your data?

In this privacy statement, DOCKR B.V. ('DOCKR' or 'we') describes how we, as the data controller, manage your personal data when you use the services of DOCKR, a vehicle (equipped with a IoT device) or this website.

## 2. What constitutes personal data?

Information about an identified or identifiable natural person constitutes personal data. DOCKR equips its vehicles with IoT devices (see under B below). Even though the data of a vehicle are not *personal* data as a general rule, the vehicle is always used by a person. Because the data of a person can be combined with the data of a vehicle, we treat all data as personal data.

## 3. Personal data we process:

We process personal data about you (and/or the users of a vehicle) because you provide us with data yourself when entering into a contract with us, when using a vehicle or when using this website.

### *A) Data generated by your use of our services and/or website*

If you make use of DOCKR services, such as a lease agreement for the use of a vehicle or otherwise have contact with us, we process the following personal data as part of our services – depending on the exact use you make of them:

- data required to facilitate the lease of a vehicle, such as your contact details, name, address;
- data required for financial administration, such as your bank account number, name and address;
- your communication preferences and settings;
- surfing behaviour, determined on the basis of our own observations or cookies (see also Article 9 of this privacy statement);
- data that relate to your peripherals, such as a MAC address, IP address or other number;
- data on your use of our customer service.

### *B) Data processed via an IoT device in the DOCKR vehicles*

Every vehicle issued by DOCKR is fitted with an IoT device. When you enter into a lease agreement with DOCKR, it is technically possible to read specific information from the vehicle. Data collected and processed from the vehicle via an IoT device include the following:

- ODO/mileage counter, speed, usage settings of the vehicle, remaining battery life and support, battery usage and status, engine temperature, usage time, time stamp, vehicle identification data, vehicle GPS data and data from the IoT device itself.

The processing of this data is necessary for our services and the scheduled maintenance of the vehicles. DOCKR has chosen to install an IoT device in the vehicles partly because of the high

replacement value of these vehicles. In this way, DOCKR aims to offer its vehicles to you at the most competitive price and to make their use as trouble-free as possible.

#### **4. Processing: principles and legitimate interests**

Personal data are processed on the basis of the following legal principles:

1. Consent;
2. Execution of an agreement with you;
3. Legal obligation;
4. Fulfilment of a public-interest task;
5. Legitimate interest of DOCKR or a third party.

Legitimate interests include security, crime prevention, vehicle maintenance, IT management, research and analysis of own products or services, business administration, legal matters and internal management.

#### **5. Purposes of processing personal data**

We are careful when processing personal data. We only use data that are necessary for our services. DOCKR processes personal data for the purposes listed below. The numbers after each purpose corresponds with the basis mentioned in Article 4 of this privacy statement.

##### ***A) Purposes of processing personal data***

- The delivery and interim maintenance of the vehicle [basis: 2 and 5];
- Taking care of the administration of DOCKR for financial and tax obligations, including the collected invoicing for our services [basis: 2 or 3];
- The 'lost and found' process of stolen or lost vehicles and in case of non-payment via tracking [basis: 2 and 5];
- Communicating with and informing you and providing service (e.g. via customer service) [basis: 2 and 5];
- Providing service, for example in the case of maintenance, repair and/or replacement of the vehicle [basis: 2 and 5].

##### ***B) General purposes***

- To build and maintain customer relationships [basis: 2];
- Providing customer support including service around the purchase of services and handling complaints and requests [basis: 2];
- The processing of personal data into management information [basis: 2 and 5];
- Conducting market research, including measuring customer satisfaction, in order to improve our business operations, brands, services and products [basis: 5];
- The further development and improvement of new and existing products and services [basis: 5];
- To fulfil legal obligations, settle disputes and enforce our rights and agreements [basis: 2, 3 or 5];
- The analysis of cookies from our website, in order to best tailor the content of our communication to your personal preferences [basis: 1 or 5].

#### **6. No processing of data of persons under 16 years of age**

We have no intention of collecting data from persons under the age of 16. We advise parents to be involved in the online activities of their children to prevent DOCKR from processing their personal data.

## 7. Sharing with third parties

DOCKR shares your personal data with third parties in the following cases and for the corresponding reasons. The numbers after each purpose correspond with the basis stated in Article 4 of this privacy statement:

- To ensure that we can properly perform the agreements made. For example, the maintenance of a vehicle by a Service Partner, arranging for transport or breakdown assistance and all other activities designed to ensure that you are and remain satisfied with us [basis: 1, 2 and 5];
- If we are legally obliged or authorized to provide personal data to third parties [basis: 1, 2, 3 or 5];
- If we suspect a violation of the rights of third parties, of criminal offences or of abuse, we can provide personal data to third parties that have a legitimate interest in doing so or to bodies that serve the public interest. This may also include enforcement authorities such as the Public Prosecution Service or regulators [basis: 3, 4 or 5];
- DOCKR may also share your information for the purpose of legitimate business interests, such as central administration or customer service and to analyse our service to you [basis: 2 and 5];
- With parties that assist DOCKR in its services and are not processors (for example, accountants and legal or other advisers) [basis: 5];
- For business purposes (such as the sale of company operations or shares or a reorganisation) [basis: 5].

DOCKR also uses services of third parties that act as ‘processors’, for example hosting service providers. If these third parties are designated as processors in accordance with applicable data protection legislation, DOCKR will make written agreements with these third parties. These service providers will process personal data only in accordance with the instructions and under the control of DOCKR.

If personal data are sent to a recipient abroad, this is generally only done to a recipient in a country that, according to the European Commission, offers an adequate level of protection for personal data. If personal data are sent to a recipient in a country that does not offer an adequate level of protection, DOCKR will ensure that the legally required safeguards are put in place.

If you wish to receive further information about the transfer of your personal data to countries outside the European Economic Area, please contact the Data Protection Officer of DOCKR (see Article 12).

## 8. Retention of your data

We will retain personal data for as long as is necessary or permissible within the scope of the purposes described in this privacy statement and in accordance with applicable law. The criteria used to determine our retention period include the following:

- The length of time we have an ongoing relationship with you and provide services to you (for example, as long as you continue to use our services);
- Whether there is a legal obligation that we must fulfil (for example, certain laws require us to retain our transactions for a certain period of time before we can delete them); or
- Whether retention is appropriate in light of our legal position (such as regarding statutes of limitations, disputes, or regulatory investigations).

## 9. Mapping online activities

When you visit our website or purchase services, we may use cookies, web beacons and other similar information storage technologies in order to personalise advertising and provide you with a better, faster and more secure customer experience. If you do not want cookies, you can indicate this. For more data on the use of cookies, please refer to our cookie statement (<https://dockr.nl/cookies/>). Our website may contain links to other websites. We are not responsible for how these websites

manage your personal data. Please consult the privacy statement of the website you are visiting for more information.

DOCKR offers its customers the possibility of using a Service Portal. In this online Service Portal, customers can submit service reports, collect overviews and contact DOCKR and external parties (see Chapters 5 and 7). Customers are responsible for managing their login data carefully and not sharing them with third parties.

#### **10. Your rights, including the right to object**

You have the right to know which of your personal data we are processing and to whom we have provided your personal data. If you have given permission for the processing of your personal data, you also have the right to withdraw this permission. If you wish to access, correct, update, limit or remove your personal data that we process, or object to the processing of personal data or to direct marketing, or if you wish to receive an electronic copy of your personal data in order to transfer it to another company (insofar as this right to data transfer is provided to you by the applicable legislation), please contact the service desk using the contact data given in Article 12.

Please describe as clearly as possible in your request the personal data to which your request relates. We will respond to your request as quickly as reasonably practicable and in any event within the legally required time limits. Finally, you have the right to lodge a complaint with the Dutch Data Protection Authority.

You can exercise your rights only to the extent that the law grants you these rights. To ensure that you yourself make a request, we may ask you to enclose a copy of your proof of identity with the request. We only ask this if we deem it necessary to identify you and we also request that the passport photo, MRZ (machine readable zone; the strip with numbers at the bottom of the passport), passport number and Citizen Service Number (CSN) are made unrecognisable on this copy. We destroy the copy of your ID immediately after we have identified you.

#### **11. Data security and protection**

DOCKR applies appropriate security measures to prevent abuse, loss, unauthorized access, unwanted disclosure and unauthorized changes as much as possible. DOCKR has taken both technical and organizational measures to protect your personal data, such as the use of encryption techniques. These security measures are regularly reviewed on the basis of threats.

#### **12. Contact**

DOCKR has its registered office in Leusden. For questions and/or comments regarding this privacy statement, please contact:

DOCKR B.V.  
Attn: Privacy  
Zuiderinslag 2  
3833 BP Leusden  
The Netherlands  
Email: [info@dockrmobility.com](mailto:info@dockrmobility.com)

#### **13. Amendments**

The way in which we process personal data, and the composition or quantity of data that we process, may change. We therefore reserve the right to amend this privacy statement. If necessary, we will inform you of any changes.



This statement was most recently revised on 25 July 2022.