

## MOBOX Privacy Policy

This Privacy Policy outlines the aims and methods used by Webfleet Solutions Sales BV and Bridgestone Mobility Solutions BV, as Data Controllers, in the collection and processing of personal data relating to customers' subscribing to Mobox services (hereinafter **User** or **Users**).

The information in this Privacy Policy is provided in accordance with article 13 of the General Data Protection Regulation no. 2016/679 of 27 April 2016 (hereinafter **Regulation**).

### 1. Data controller

The data controllers are Webfleet Solutions Sales BV and Bridgestone Mobility Solutions BV, for the purposes of this policy represented by their Mobox division, Beethovenstraat 503, 1083 HK Amsterdam, The Netherlands. The data controllers may together be called MOBOX in this Privacy Policy and elsewhere.

### 2. Data processing methods

MOBOX processes User data applying appropriate security measures designed to prevent the unauthorised access, publication, modification or destruction of data. Processing is carried out using manual, automatic and/or electronic methods, with organisational methods and logic strictly linked and limited to the purposes indicated.

### 3. The Service

MOBOX has commercialized Mobox as a mobility solution providing Users with a set of tyres against the payment by monthly instalments. The User's subscription to the Mobox service entails the processing of User's personal data needed to register the User as a customer, to verify the User's creditworthiness and identity, and to communicate with the User in regard to contract execution, tyre maintenance scheduling, invoicing and payment matters

### 4. Purpose of data processing and legal basis

MOBOX processes User data for the following purposes:

- a) **Registration of the User as a Mobox customer:** when subscribing to a Mobox service at one of Bridgestone's participating dealers or online, the User will be asked to provide basic identification and contact data to create a customer account.
- b) **Tyre supply and maintenance:** once the User has subscribed to a Mobox Service, we need to make arrangements for the supply of the tyres, and schedule service appointments for the User from time to time.
- c) **Customer service:** to provide the User with general customer service we need to process certain personal data such as contact information, data relating to the User's use of the Service and the products provided under that service.
- d) **Accounting:** we process User's data in regard to any credit matter or delayed payment.

- e) **Verification of User's identity:** we require User's to provide as at the time of registration with a copy of their ID card, passport or driver's license, in order to verify their Identity and place of residence. Immediately upon verification of the accuracy of provided data, Bridgestone will destroy the copy. User will also be required to apply an e-signature to the Mobox contract as part of the registration process.
- f) **Direct marketing:** we may send User from time to time direct marketing relating to Mobox offers and similar services.

The processing for purposes (a) through (d) are carried out on the lawful basis that these processing activities are necessary to fulfil our obligations and exercise our rights under the Mobox contract.

The processing for purpose (e) is carried out on the basis of our legitimate interest, as a provider of services on payment by instalments, to verify the User's identity and domicile.

The processing for purpose (f) is carried out on the basis of our legitimate interest to keep our customers informed of Mobox offers or similar products or services.

## 5. Categories of processed data

Bridgestone will receive and collect the following information from Users:

First name, last name, data of birth, domicile, telephone number , e-mail address , license plate number , bank account number , copy of ID card, passport or driver's license.

## 6. Necessity of the data processing

The User's provision of the personal data are a requirement necessary to enter into the Mobox contract. The User is obliged to provide the personal data in order to conclude the Mobox contract. MOBOX will refrain from concluding a Mobox contract if the necessary data provided by the User is inaccurate or incomplete.

## 7. Recipients of the Data

Data recipients are:

- Employees of MOBOX's Mobox division and accounting department
- The dealer which User has selected for the supply of the products and the services.
- The service provider that MOBOX has contracted for verification of User's identity.
- Cloud service providers for User data storage.
- Marketing agency for the communication of direct marketing.
- E-signature services provider.

## 8. Data storage

MOBOX retains the personal data for a period of 7 years from the expiry of the User's Mobox contract, to meet its legal retention obligation relating to accounting records.

## **9. Data Transfers outside the UK**

MOBOX will process the User's personal data at its headquarters in Brussels, and will export some personal data to its e-signature provider located in the United States. Transfers of personal data to the European Economic Area, in the absence of an adequacy decision regarding the level of data protection by the UK Government, which is pending the Brexit agreement, and to the United States occur on the basis of contractual agreements using standard contractual clauses adopted by the UK Government. Users have the right to obtain a copy of the appropriate or suitable safeguards relating to the data transfer to the EEA or the US, by using the contact means listed in §11.

## **10. User rights**

Users can exercise the rights set out in the Regulation in the cases provided for by legislation, and where applicable. In particular, Users have the right to request the following:

- confirmation that their personal data is being processed, and if so, to ask MOBOX for access to information on the processing itself (e.g. purpose, categories of processed data, recipients or data recipient categories, storage period etc.);
- for incorrect or incomplete data to be amended;
- verify that the data controller has deleted the data (e.g. if personal data are no longer necessary for the purposes stated, if consent on which processing is based is withdrawn etc.);
- that processing be restricted (e.g. if the User challenges the accuracy of the data; if treatment is illegal or deleting personal data is opposed; if the data are necessary to exercise or defend user rights in court, even if MOBOX no longer needs the data; in the case of exercising the right to object, for the time required to check the existence of legitimate reason);
- Users also have the right to object to receiving direct marketing at the outset by stating their objection at registration date or anytime during the contract.

These rights can be exercised by emailing [privacy@webfleet.com](mailto:privacy@webfleet.com).

Finally, if Users believe their data are being processed in breach of the provisions of the Regulation and applicable legislation on protecting personal data, they have the right to complain to their national Data Protection Supervisory Authority as set out in article 77 of the Regulation, or to take action through the appropriate legal channels (article 79 of the Regulation).

## **11. Contact**

Users can contact MOBOX in regard to this privacy policy by writing to MOBOX, Beethovenstraat 503, 1083 HK Amsterdam, the Netherlands, or by leaving a message to MOBOX's data protection organisation at [privacy@webfleet.com](mailto:privacy@webfleet.com)

## **12. Changes to the Privacy Policy**

MOBOX reserves the right to amend this Privacy Policy at any time, through notification to Users by e-mail.

*Privacy Policy last updated on 1 December 2021.*