

DATA PROTECTION NOTICE

ARVAL DEUTSCHLAND

ARVAL DEUTSCHLAND GMBH



ARVAL
BNP PARIBAS GROUP

For the many journeys in life

DATA PROTECTION NOTICE

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Preliminary section: Main amendments

As a trusted companion, the protection of your personal data is important to the [BNP Paribas Group](#). We have enhanced our Privacy Notice by being more transparent on the following information on:

- processing activities relating to commercial prospection
- processing activities relating to anti-money laundering and countering the financing of terrorism, and international sanctions (freezing of assets)

Introduction

We take the protection of your personal data very seriously; accordingly, the BNP Paribas Group has adopted strong principles in its Personal Data Protection Charter available at [Personal Data Privacy Charter](#).

Arval Deutschland GmbH ("We"), as a controller, is responsible for collecting and processing your personal data in relation to its activities.

Our mission is to support all our clients – individuals, entrepreneurs, small and medium-sized enterprises, large corporations and institutional investors.

As a member of an integrated banking-insurance Group in collaboration with the various entities of the Group, we provide our customers with a complete range of banking, investment, savings, insurance and leasing products and services.

The purpose of this Privacy Notice is to explain how we process your personal data and how you can exercise your associated rights.

1. ARE YOU SUBJECT TO THIS NOTICE?

This Privacy Notice applies to you if you are ("You"):

- one of our customers or in a contractual relationship with us;
- a member of our customer family. For example, because our customers occasionally provide us with information about their family when it is necessary to offer them a product or service;
- a person interested in our products or services when you provide us with your personal data (e.B. on our websites and digital applications, at events or sponsorship campaigns or through an agency) so that we can contact you.
- a driver of our corporate customers.

When you provide us with personal data related to other people, please make sure that you inform them about the disclosure of their personal data and invite them to read this Privacy Notice. We will ensure that we will do the same whenever we have the person's contact details.

2. HOW CAN YOU CONTROL THE PROCESSING ACTIVITIES WE DO ON YOUR PERSONAL DATA?

You have rights which allow you to exercise control over your personal data and how we process them.

If you wish to exercise the rights listed below, please submit a request by mailing a letter to the following address Arval Deutschland GmbH, Bajuwarenring 5, 82041 Oberhaching or via email to: privacy@arval.de or on our [websites](#).¹ If necessary, we will ask you to submit suitable proof of identity for identification.

If you have any questions relating to our use of your personal data under this Privacy Notice, please contact our Data Protection Officer at the following address privacy@arval.de

2.1. You can request access to your personal data

If you wish to have access to your personal data, we will provide you with a copy of the personal data you requested as well as information relating to their processing.

Your right of access may be limited in the cases foreseen by laws and regulations. This is the case with the regulation relating to anti-money laundering and countering the financing of terrorism, which prohibits us from providing information on such processes.

2.2. You can ask for the correction of your personal data

Where you consider that your personal data are inaccurate or incomplete, you can request that such personal data be modified or completed accordingly. In some cases, supporting documentation may be required.

2.3. You can request the deletion of your personal data

If you wish, you may request the deletion of your personal data, to the extent permitted by law.

2.4 You can object to the processing of your personal data based on legitimate interests

If you do not agree with a processing activity based on a legitimate interest, you can object to it, on grounds relating to your particular situation, by informing us precisely of the processing activity involved and the reasons for the objection. We will cease processing your personal data unless there are compelling legitimate grounds for doing so or it is necessary for the establishment, exercise or defense of legal claims.

2.5 You can object to the processing of your personal data for commercial prospecting purposes

You have the right to object at any time to the processing of your personal data for commercial prospecting purposes, including profiling, insofar as it is linked to such prospecting.

2.6. You can suspend the use of your personal data

If you question the accuracy of the personal data we use or object to the processing of your personal data, we will verify your request. You may request that we restrict the processing of your personal data for the duration of this audit.

2.7. You have rights against an automated decision

As a matter of principle, you have the right not to be subject to a decision based solely on automated processing based on profiling or otherwise that has a legal effect or significantly affects you. However, we may automate

¹ <https://www.arval.de/dokumente-und-kundenformular>

such a decision if it is necessary for the entering into or performance of a contract with us, authorised by regulation or if you have given your consent.

In any event, you have the right to challenge the decision, express your views and request the intervention of a competent person to review the decision.

2.8. You can withdraw your consent

If you have given your consent to the processing of your personal data, you can withdraw this consent at any time.

2.9. You can request the portability of part of your personal data

You may request a copy of the personal data that you have provided to us in a structured, commonly used and machine-readable format. Where technically feasible, you may request that we transmit this copy to a third party.

2.10. How to file a complaint with the supervisory authority

In addition to the rights mentioned above, you may lodge a complaint with the competent supervisory authority. The address of the supervisory authority responsible for us is, Bayerisches Landesamt für Datenschutzaufsicht, Promenade 18, 91522 Ansbach, Germany.

3. WHY AND ON WHICH LEGAL BASIS DO WE USE YOUR PERSONAL DATA?

3.1. Your personal data are processed to comply with our numerous regulatory obligations

Your personal data are processed where necessary to enable us to comply with the regulations to which we are subject, including banking and financial regulations.

3.1.1. We use your personal data to:

- manage and report risks (financial, credit, legal, compliance or reputational risks etc.) that the BNP Paribas Group could incur in the context of its activities;
- assist the fight against tax fraud and fulfil tax control and notification obligations;
- record transactions for accounting purposes;
- prevent, detect and report risks related to Corporate Social Responsibility and sustainable development;
- detect and prevent bribery;
- comply with the provisions applicable to trust service providers issuing electronic signature certificates;
- exchange and report different operations, transactions or orders or reply to an official request from a duly authorized local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, law enforcement, state agencies or public bodies.

3.1.2. We also process your personal data for anti-money laundering and countering of the financing of terrorism purposes

As part of a banking Group, we must have a robust system of anti-money laundering and countering of terrorism financing (AML/TF), as well as a system for applying local, European and international sanctions.

In this context, we are joint controllers with BNP Paribas SA, the parent company of the BNP Paribas Group.

The processing activities performed to meet these legal obligations are detailed in Appendix 1.

3.2. Your personal data are processed to perform a contract to which you are a party or pre-contractual measures taken at your request

Your personal data are processed when it is necessary to enter into or perform a contract to:

- provide you with the products and services subscribed to under the applicable contract;
- provide you with products, services, specific installation (such EV charging station) or mobility solutions;
- to register you as a new client, enter into a contract and perform it with you;
- handle billing, invoicing and recovery;
- provide you with services related to the preparation, delivery or use and the management of vehicles:
- configure and quote your vehicle;
- deliver your vehicle at the place of your choice, possibly with equipment related to electric Vehicle charging devices in partnership with selected providers;
- for insurance purposes;
- in the context of OEMs recall campaigns in case of defect;
- provide reporting;
- Handling accidents and claims;
- manage vehicle tax and public broadcasting contributions;
- provide consulting services;
- manage maintenance, breakdown, vehicle inspection, claim repair request with respect to the Vehicles;
- provide roadside assistance;
- provide a relief vehicle when needed:
- provide you with fuel cards (to pay for your fuel) or to provide mobility cards (to charge your electric vehicle), to carry out transactions with regard to the fuel cards and to bill the contractual partner in detail for consumption. On behalf of the customer we carry out details of refueling transactions such as location, time, date are transmitted (in particular for billing purposes and for the creation of reports);
- provide you with other mobility solutions subscribed to under the applicable contract;
- raise your awareness of the impact of your driving on the environment or if you want to improve your safety on the road (driver training);
- manage traffic and parking fines and offences related to the use of the Vehicle as part of the “Fines Management” service to the extent legally authorised;
- provide you with an access to our digital platforms. We may process personal data when you use our digital platforms for several purposes (to manage your personal information or data related to Vehicles or to get an access to travel information for example);
- communicate with you. We may process personal data when you contact us, when you request us some information about our company or our services or when the contract needs to be updated;
- manage existing debts (identification of customers with unpaid debts);
- respond to your requests and assist you;
- manage the end of the contract.

3.3. Your personal data are processed to fulfil our legitimate interest or that of a third party

Where we base a processing activity on legitimate interest, we balance that interest against your interests or fundamental rights and freedoms to ensure that there is a fair balance between them. If you would like more information about the legitimate interest pursued by a processing activity, please contact us privacy@arval.de.

3.3.1. In the course of our business as a provider of mobility services, we use your personal data to:

3.3.1.1. If you are a customer or prospect:

- manage the company risks to which we are exposed:
 - internal controls;
 - we keep proof of operations or transactions, including in electronic evidence;
 - we monitor your transactions to manage, prevent and detect fraud;
 - we determine your credit risk rating and assess your ability to repay, and to develop appropriate individual statistical models;
 - we identify our customer;
- we assess (e.g. on the basis of your credit risk rating) whether we can offer you a product or service and on what terms (e.g. pricing);
- carry out financial operations such as debt portfolio sales, securitizations, financing or refinancing of the BNP Paribas Group.
- enhance cyber security, manage our platforms and websites, protect our company assets and ensure business continuity;
- implement information technology solutions;
- maintain information systems in operational conditions;
- use video surveillance to prevent personal injury and damage to people and property;
- enhance the automation and efficiency of our operational processes and customer services (e.g., automatic filling of complaints, tracking of your requests and improvement of your satisfaction based on personal data collected during our interactions with you such as phone recordings, e-mails or chats);
- for the preparation of offers and development of products tailored to the needs of our customers;
- for the efficient management of contract documents;
- we handle legal claims and defences in the event of litigation;
- conduct statistical studies and develop predictive and descriptive models for:
 - commercial purpose: to identify the products and services that could best meet your needs, to create new offers or identify new trends among our customers, to develop our commercial policy taking into account our customers' preferences
 - safety purpose: to prevent potential incidents and enhance safety management;
 - compliance purpose (e.g., anti-money laundering and countering the financing of terrorism) and risk management;
 - anti-fraud purposes;
- to ensure the best possible state of preservation of the vehicle and repair management;
- to ensure the safety of vehicle occupants;
- to evaluate the refueling/charging behavior (in the legitimate interest of the customer - for consulting purposes);
- to compare driving behavior with other drivers (can only be viewed pseudonymized for information purposes via the My Arval app);
- for the creation and presentation of pseudonymized survey results and statistical evaluations;
- to review and comply with ethical codes and internal company policies;
- for compliance with applicable sanction provisions, see in particular Appendix 1;

- to implement more extensive support measures for our customers in vehicle use (in particular e-mobility installation of charging stations);
- raise your awareness of the impact of your driving on the environment or if you want to improve your safety on the road;
- provide access to the Arval premises and assets. We may process personal data when you visit us in our premises in order to maintain appropriate access and security control;
- organize contests, lotteries, promotional operations, conduct opinion and customer satisfaction surveys.

3.3.1.2. If you are a driver of our customer:

- provide you with services related to the preparation, delivery or use and the management of vehicles including:
 - to configure and quote your vehicle;
 - to deliver your vehicle at the place of your choice, possibly with equipment related to electric vehicle charging devices in partnership with selected providers;
 - to assist OEMs recall campaigns in case of defect;
 - to ensure Vehicle repair, maintenance and replacement of tyres;
 - for accident management and insurance purposes;
 - for roadside assistance;
- provide you with fuel cards (to pay for your fuel) or to provide mobility cards (to charge your electric vehicle), to carry out transactions with regard to the fuel cards and to bill the contractual partner in detail for consumption. On behalf of the customer we carry out details of refueling transactions such as location, time, date are transmitted (in particular for billing purposes and for the creation of reports);
- manage contracts for the provision of electric vehicle charging infrastructure, and in particular:
 - determine your eligibility for our offers;
 - make appointments for the installation and removal of charging infrastructure;
 - provide breakdown assistance.
- raise your awareness of the impact of your driving on the environment or if you want to improve your safety on the road;
- provide driver training (e.g., to improve your knowledge of the environmental impacts of your driving or if you want to improve your safety on the road);
- manage traffic and parking fines and offences related to the use of the vehicle as part of the “Fines Management” service;
- manage our customers’ accounts, manage the contractual relationship with our customers of whom you are an employee or to keep you informed about the development of our mobility products, services and solutions;
- provide fleet management services and reports to our customers in relation with the Vehicles’ habits (kilometres travelled, fuel or alternative energy consumption, etc.);
- provide you with an access to our digital platforms. We may process personal data when you use our digital platforms for several purposes (to manage your personal information or data related to Vehicles or to get an access to travel information for example);
- manage resolution of disputes and assist you and answer your requests and complaints;
- provide access to the Arval premises and assets. We may process personal data when you visit us in our premises in order to maintain appropriate access and security control;
- communicate with you. We may process personal data when you contact us, when you request us some information about our company or our services or when the contract needs to be updated;
- provide reporting to our customers;
- manage vehicle tax and public broadcasting contributions;
- provide consulting services to our customers;
- handle billing and invoicing;

- send severe weather alerts when the driver or customer provides us with the necessary contact information.

3.3.2. We use your personal data to send you offers by electronic mail and by post

As part of the BNP Paribas Group, we want to be able to offer you access to the full range of products and services that best meet your needs.

Once you are a customer and unless you object, we may send you these offers electronically for our products and services and those of the Group if they are similar to those you have already subscribed to.

We will ensure that these commercial offers relate to products or services that are relevant to your needs and complementary to those you already have to ensure that our respective interests are balanced.

We may also send you, by phone and post, unless you object, offers concerning our products and services as well as those of the Group and our trusted partners.

3.3.3. We analyse your personal data if applicable in order to create a standard profile to better personalise our products and offers

To enhance your experience and satisfaction, we need to determine to which customer group you belong. For this purpose, we build a standard profile from relevant data that we select from the following information:

- what you have directly communicated to us;
- resulting from your use of our products or services, e.g. in connection with your accounts, including account balance, regular or atypical movements, the use of your card abroad, as well as the automatic categorization of your transaction data [(e.B. the distribution of your expenses and income by category as visible in your Customer Area)];
- from your use of our various channels: websites and applications (e.g., if you are digitally savvy, if you prefer a customer journey to subscribe to a product, or service with more autonomy (selfcare));

In this way we may go further to better meet your needs by performing a tailor-made customization as described below.

3.4. Your personal data are processed if you have given your consent

For some processing of personal data, we will give you specific information and ask for your consent. Of course, you can withdraw your consent at any time.

In particular, we ask for your consent for:

- tailor-made customization of our offers and products or services based on more sophisticated profiling to anticipate your needs and behaviours;
- any electronic offer for products and services not similar to those you have purchased or commissioned, or for products and services from other companies in the Group or our trusted partners;
- use of your navigation data (cookies) for commercial purposes or to enhance the knowledge of your profile.

You may be asked for further consent to process your personal data where necessary.

4. WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

We collect and use your personal data, meaning any information that identifies or allows one to identify you.

Depending among others on the types of product or service we provide to you and the interactions we have with you, we collect various types of personal data about you:

- **Identification information:** e.g., full name, gender, place and date of birth, nationality, identity card number, passport number, driving licence number, vehicle registration number, photograph, signature);
- **Contact information:** (private or professional) postal address, e-mail address, phone number;
- **Information relating to your financial and family situation:** e.g., marital status, matrimonial regime, number of children and age, study or employment of children, composition of the household, property you own: apartment or house;
- **Information related to your vehicle rental agreement:** e.g. contract number, vehicle make and model, fuel card number, energy card number, toll pass data (e.g. time and location);
- **Information related to the energy or fuel consumption of the vehicle leased from Arval:** e.g. consumption, costs, time and location of fueling/transactions made with cards, details of total costs to justify the total cost;
- **Information related to your home (regarding charging infrastructure):** type of home, data about your electrical installation, photograph of your electrical installation;
- **Lifestyle:** hobbies and interests, travel, your environment (nomadic, sedentary);
- **Economic, financial and tax information:** e.g., tax ID, tax status, country of residence, salary and other income, value of your assets;
- **Education and employment information:** e.g., level of education, employment, employer's name and remuneration;
- **Banking and financial information related to the products and services you hold:** e.g., bank account details, products and services owned and used (credit, insurance, savings and investments, leasing, home protection), credit card number, money transfers, assets, profile of declared investor, credit history, payment incidents;
- **Transaction data:** transactions including beneficiary's data such as full names, addresses and contact details as well as details of bank transactions, amount, date, time and type of transaction (credit card, transfer, cheque, direct debit);
- **Data relating to your habits and preferences in relation to the use of our products and services;**
- **Data collected from our interactions with you:** e.g., your comments, suggestions, needs collected during our exchanges with you in person in our Agencies (reports) and online during phone communications (conversation), discussion by e-mail, chat, chatbot, exchanges on our social media pages and your latest complaints. Your connection and tracking data such as cookies and tracers for non-advertising or analytical purposes on our websites, online services, applications, social media pages;
- **Data collected from the video protection system (including CCTV) and geolocation:** e.g., showing locations of withdrawals or payments for security reasons, or to identify the location of the nearest branch or service suppliers for you;
- **Data about your devices (mobile phone, computer, tablet, etc.):** IP address, technical specifications and uniquely identifying data;
- **Personalized login credentials or security features used to connect you to the Arval website and apps.**

If you are a driver of our corporate customer/prospect, we collect:

- **Identification information:** e.g., full name, gender, place and date of birth, nationality, identity card number, passport number, driving licence number, vehicle registration number, photograph, signature);
- **Contact information:** (private or professional) postal address, e-mail address, phone number;
- **Information related to your vehicle rental agreement:** e.g. contract number, vehicle make and model, fuel card number, energy card number, toll pass data (e.g. time and location);
- **Information related to the energy or fuel consumption of the vehicle leased from Arval:** e.g. consumption, costs, time and location of fueling/transactions made with cards, details of total costs to justify the total cost;
- **Information related to your home (regarding charging infrastructure):** type of home, data about your electrical installation, photograph of your electrical installation;
- **Data relating to your habits and preferences in relation to the use of our products and services;**
- **Data collected from our interactions with you:** e.g., your comments, suggestions, needs collected during our exchanges with you in person in our Agencies (reports) and online during phone communications (conversation), discussion by e-mail, chat, chatbot, exchanges on our social media pages and your latest complaints. Your connection and tracking data such as cookies and tracers for non-advertising or analytical purposes on our websites, online services, applications, social media pages;
- **Data collected from the video protection system (including CCTV) and geolocation:** e.g., showing locations of withdrawals or payments for security reasons, or to identify the location of the nearest branch or service suppliers for you;
- **Data about your devices (mobile phone, computer, tablet, etc.):** IP address, technical specifications and uniquely identifying data;
- **Personalized login credentials or security features used to connect you to the Arval website and apps.**

We may process sensitive data such as health data, biometric data or data related to criminal offences, provided that the strict conditions of the data protection regulations are complied with.

5. WHO DO WE COLLECT PERSONAL DATA FROM?

We collect personal data directly from you; however, we may also collect personal data from other sources.

We sometimes collect data from public sources:

- publications/databases made available by official authorities or third parties (e.g., the Official Journal of the French Republic, the Trade and Companies Register, databases managed by the supervisory authorities of the financial sector);
- websites/social media pages of legal entities or business clients containing information that you have disclosed (e.g., your own website or social media page);
- public information such as that published in the press.

We also process personal data from third parties:

- from other BNP Paribas Group entities;
- from our customers (companies or individuals);
- from our business partners (including car manufacturers/OEMs, car dealers, cooperation partners, energy companies);
- from service providers of payment initiation and account aggregators (service providers of account information);

- from third parties such as credit reference agencies (e.g. SCHUFA Holding AG, Kormoranweg 5, D-65201 Wiesbaden, Verband der Vereine Creditreform e.V., Hammfelddamm 13, 41460 Neuss) and fraud prevention agencies;
- from data brokers who are responsible for ensuring that they collect relevant information in a lawful manner.

6. WHO DO WE SHARE YOUR PERSONAL DATA WITH AND WHY?

a. With BNP Paribas Group's entities

As a member of the BNP Paribas Group, we work closely with the Group's other companies worldwide.

Your personal data may therefore be shared between BNP Paribas Group entities, where necessary, to:

- comply with our various legal and regulatory obligations described above;
- fulfil our legitimate interests which are:
 - to manage, prevent, detect fraud;
 - conduct statistical studies and develop predictive and descriptive models for business, security, compliance, risk management and anti-fraud purposes;
 - enhance the reliability of certain data about you held by other Group entities;
 - offer you access to all the Group's products and services that best meet your needs and wishes;
 - customize the content and prices of products and services;
 - further purposes listed under point 3.

Our financing and refinancing also constitute a legitimate interest implying your personal data may be shared with entities of the BNP Paribas Group which are providing our refinancing.

For clients insured with Greenval Insurance DAC ("Greenval"), your data may be shared with Greenval acting as a controller, for the purposes of Greenval managing insurance claims, policies and premiums. For more information on how Greenval is processing your personal data, please see the Greenval Data Protection Notice [here](#).

Your personal data may also be shared between Arval Group companies to conduct statistical studies and develop predictive and descriptive models for business, security, compliance, risk management and anti-fraud purposes.

In this context, We and such other Arval Group companies may act as joint controllers by using a joint tool, through which there is shared access to and mutual use of the personal data of customers and drivers.

Requests from data subjects regarding data subject rights may be submitted to either of the joint controllers. The joint controllers inform each other about such requests and support each other in order to address them.

The processing is based on the joint controllers' legitimate interest of improving their products and services by conducting such statistical studies.

b. With recipients outside the BNP Paribas Group and processors

In order to fulfil some of the purposes described in this Privacy Notice, we may, where necessary, share your personal data with:

- processors which perform services on our behalf (e.g., IT services, logistics, printing services, telecommunication, debt collection, advisory and distribution and marketing).

- banking and commercial partners, independent agents, intermediaries or brokers, financial institutions, counterparties, trade repositories with which we have a relationship if such transmission is required to allow us to provide you with the services and products or execute our contractual obligations or transaction;
- Insurances and cooperation partners for certain products;
- Credit bureaus/rating agencies;
- local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, public authorities or institutions (e.g., the *Banque de France*, *Caisse des dépôts et des Consignations*), to which we, or any member of the BNP Paribas Group, are required to disclose pursuant to:
 - their request;
 - our defence, action or proceeding;
 - complying with a regulation or a recommendation issued from a competent authority applying to us or any member of the BNP Paribas Group;
- service providers of third-party payment (information on your bank accounts), for the purposes of providing a payment initiation or account information service if you have consented to the transfer of your personal data to that third party;
- certain regulated professions such as lawyers, notaries, or auditors when needed under specific circumstances (litigation, audit, etc.) as well as to our insurers or to an actual or proposed purchaser of the companies or businesses of the BNP Paribas Group.
- Cooperation partners (especially vehicle manufacturers/OEMs) - in case our customer expresses interest in offers from this manufacturer.

7. INTERNATIONAL TRANSFERS OF PERSONAL DATA

In case of international transfers originating from the European Economic Area (EEA) to a non-EEA country, the transfer of your personal data may take place. Where the European Commission has recognised a non-EEA country as providing an adequate level of data protection, your personal data may be transferred on this basis.

For transfers to non-EEA countries where the level of protection has not been recognized as adequate by the European Commission, we will either rely on a derogation applicable to the specific situation (e.g., if the transfer is necessary to perform our contract with you, such as when making an international payment) or implement one of the following safeguards to ensure the protection of your personal data:

- Standard contractual clauses approved by the European Commission;
- Binding corporate rules.

To obtain a copy of these safeguards or details on where they are available, you can send a written request as set out in clause 2.

8. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will retain your personal data over the period required to comply with applicable laws and regulations or another period with regard to our operational requirements, such as proper account maintenance, facilitating customer relationship management, and responding to legal claims or regulatory requests.

9. HOW TO FOLLOW THE EVOLUTION OF THIS PRIVACY NOTICE

In a world where technologies are constantly evolving, we regularly review this Privacy Notice and update it as required.

We invite you to review the latest version of this document online, and we will inform you of any significant amendments through our website or through our standard communication channels.

10. HOW IS MY PRIVACY PROTECTED WHEN I HAVE AN ARVAL CONNECTED MOTOR VEHICLE?

The connectivity function allows data to be transmitted from the vehicle (telematics capability). Electronically recorded vehicle data is processed as follows:

- Arval obtains vehicle data from the following manufacturers: Stellantis (Citroën, DS Automobiles, Peugeot, Opel, Vauxhall, Abarth, Fiat, Lancia, Alfa Romeo, Maserati, Chrysler, Dodge, Jeep, Ram, Mopar), Ford, Mercedes Renault/Dacia, BMW).
- In a few cases, Arval installs its own box. We will inform you of this separately (in particular by means of a sticker—QR code—in the vehicle).
- In addition to the data processing described above, Arval offers its customers its own service for collecting and evaluating vehicle data – Arval Connect. In this case, the customer has access to the vehicle data and is responsible for data processing. The details are governed by a separate contract for order processing in accordance with Art. 28 GDPR. The customer, as the employer, will provide separate information on this as an independent controller under data protection law.

We would like to inform you about the details of the manufacturer data transmitted in the following table. It lists the individual data categories and Arval's respective legitimate interests. The purposes of processing are strictly limited to the information listed below.

When your vehicle is an Arval connected Motor Vehicle, some data is collected by Arval via remote data transmission from the telematics equipment installed in the Motor Vehicle (the "Device"). Arval may process such data to serve its legitimate interests as described in the table below. The purposes of processing and the data retention time will not exceed the indications provided below.

Data	Legitimate interests, Art. 6(1)(f) GDPR	Notes
Mileage of the vehicle	Proactive information from the lessor regarding necessary contract adjustments	The data is transmitted by the manufacturer.
	For fleet customers: Overview of fleet performance and proactive advice on fleet usage and electrification potential	
Geolocation capture	Locating the vehicle in the event of theft or other misappropriation of the vehicle	The geographical position is transmitted from the vehicle only after a theft report has been

		made. No data is retrieved without this report. The data is transmitted by the manufacturer.
Current maintenance dates	Maintaining the vehicle in the best possible condition, proactive notifications to the contractual partner/driver	The data is transmitted by the manufacturer.
Vehicle dashboard alerts	Maintaining the vehicle in the best possible condition, proactive notifications to the contractual partner/driver	The data is transmitted by the manufacturer.
Fuel level and consumption/battery level for electric vehicles	Statistical evaluations of consumption behaviour	Processing only takes place if this data is transmitted by the manufacturer.
	For fleet customers: Overview of fleet consumption and proactive advice on fleet usage and electrification potential	
CO2 consumption of vehicles	Statistical evaluations of CO2 consumption, for example for the purposes of compliance with the Corporate Sustainability Reporting Directive (CSRD) and the CSR Directive Implementation Act	The mileage per trip and consumption are processed – determined by consumption data transmitted by the manufacturer or evaluation of Arval fuel card transactions (recorded refuelling quantity, tank volume or battery capacity or fuel type of the vehicle)
Plug-in hybrid charging data, in particular charging frequency	Statistical evaluations of charging behaviour, for example for the purposes of compliance with the Corporate Sustainability Reporting Directive (CSRD) and the CSR Directive Implementation Act, optimisation of the charging infrastructure and charging behaviour, improvement of fleet management	Transmitted charging processes from the manufacturer or evaluation of Arval fuel card transactions (recorded battery capacity, battery level, vehicle fuel type) are processed



Vehicle identification number (VIN), model specifications	Assignment of data to a specific vehicle or model or to a contract	The data is transmitted by the manufacturer.
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If you are a driver/employee of our corporate customer:

Arval provides the following data to our business customers via MyArval. The data is processed on the basis of the legitimate interest listed.

Data	Legitimate interests, Art. 6(1)(f) GDPR	Notes
Mileage	Evaluation of the mileage of fleet vehicles	Daily mileage with time stamps from OEMs, OBD systems or GPS devices is used as the basis for calculation (no individual data available for evaluation purposes).
Monthly mileage below 100 km	Fleet utilisation review	The evaluation is carried out on a fleet-based and vehicle-based basis.
Calculated mileage and maintenance dates	Checking and adhering to maintenance dates, maintaining the vehicle in the best possible condition	The evaluation is fleet-based and vehicle-based.
Checking daily mileage categorised by 200 km, 300 km and 400 km	Checking the electrification potential within the fleet	The evaluation is based on averages, fleet-based and vehicle-based; the specific daily mileage is not available
Actual mileage compared to contractually agreed mileage	Overview of necessary contract adjustments	The evaluation is fleet-based and vehicle-based in relation to the contractually agreed mileage
Actual or estimated CO2 emissions of the vehicles	Review and evaluation of the fleet's carbon footprint	The evaluation is fleet-based and vehicle-based.
Charging frequency of PHEV vehicles	Checking the charging frequency to optimise charging behaviour	The evaluation is carried out on a fleet-based and vehicle-based basis.
Monthly fuel consumption or estimated monthly fuel consumption	Statistical evaluation of consumption behaviour	The evaluation is fleet-based and vehicle-based.

11. WILL MY DATA BE USED FOR AUTOMATED DECISION MAKING INCLUDING PROFILING (SCORING)?

a. Automated decision making

In principle, we process your personal data without the use of automated decision-making. Only in some cases, we use automated decision-making to speed up business processes in the following cases.

As part of the business initiation process, we assess your creditworthiness, known as scoring. In this process, we calculate the probability with which a customer will meet his payment obligations in accordance with the contract. This calculation takes into account various factors, such as income, expenses, existing liabilities, occupation, employer, length of service, experience in previous business relationships, repayment of previous loans in accordance with the contract, and other information from credit agencies. The scoring is based on a statistically recognized and proven calculation method. The calculated score values form the basis for automated decision-making.

You have the rights listed under 2.7 with regard to this automated decision-making process.

b. Profiling

We process your data automatically in some cases with the aim of evaluating certain personal aspects (profiling). We use profiling in the following cases:

- To customize our offers and products or services based on your needs and past behaviour;
- to evaluate customer satisfaction and increase customer satisfaction;
- Ongoing review of credit risks of our cooperation partners;
- Timeliness review as part of our "Know Your Customer" (KYC) program, see also Appendix 1;
- Screening of customer database and transaction filtering, see also Appendix 1;
- Processing of pseudonymized data for evaluation of driver behaviour, see also 10;
- Screening of electronic communications to prevent crime and protect our assets.

Appendix 1

Processing of personal data to combat money laundering and the financing of terrorism

We are part of a banking Group that must adopt and maintain a robust anti-money laundering and countering the financing of terrorism (AML/CFT) programme for all its entities managed at central level, an anti-corruption program, as well as a mechanism to ensure compliance with international Sanctions (i.e., any economic or trade sanctions, including associated laws, regulations, restrictive measures, embargoes, and asset freezing measures that are enacted, administered, imposed, or enforced by the French Republic, the European Union, the U.S. Department of the Treasury's Office of Foreign Assets Control, and any competent authority in territories where BNP Paribas Group is established).

In this context, we act as joint controllers together with BNP Paribas SA, the parent company of the BNP Paribas Group.

To comply with AML/CFT obligations and with international Sanctions, we carry out the processing operations listed hereinafter to comply with our legal obligations:

- A Know Your Customer (KYC) program reasonably designed to identify, verify and update the identity of our customers, including where applicable, their respective beneficial owners and proxy holders;
- Enhanced due diligence for high-risk clients, Politically Exposed Persons or "PEPs" (PEPs are persons defined by the regulations who, due to their function or position (political, jurisdictional or administrative), are more exposed to these risks), and for situations of increased risk;
- Written policies, procedures and controls reasonably designed to ensure that the Bank does not establish or maintain relationships with shell banks;
- A policy, based on the internal assessment of risks and of the economic situation, to generally not process or otherwise engage, regardless of the currency, in activity or business:
 - for, on behalf of, or for the benefit of any individual, entity or organisation subject to Sanctions by the French Republic, the European Union, the United States, the United Nations, or, in certain cases, other local sanctions in territories where the Group operates;
 - involving directly or indirectly sanctioned territories, including Crimea/Sevastopol, Cuba, Iran, North Korea, or Syria;
 - involving financial institutions or territories which could be connected to or controlled by terrorist organisations, recognised as such by the relevant authorities in France, the European Union, the U.S. or the United Nations.
- Customer database screening and transaction filtering reasonably designed to ensure compliance with applicable laws;
- Systems and processes designed to detect and report suspicious activity to the relevant regulatory authorities;
- A compliance program reasonably designed to prevent and detect bribery, corruption and unlawful influence pursuant to the French "*Sapin II*" Law, the U.S FCPA, and the UK Bribery Act.

In this context, we make use of:

- services provided by external providers that maintain updated lists of PEPs such as Dow Jones Factiva (provided by Dow Jones & Company, Inc.) and the World-Check service (provided by REFINITIV, REFINITIV US LLC and London Bank of Exchanges);
- public information available in the press on facts related to money laundering, the financing of terrorism or corruption;
- knowledge of a risky behaviour or situation (existence of a suspicious transaction report or equivalent) that can be identified at the BNP Paribas Group level.

Due to the objective – combating money laundering and terrorist financing – we may need to process special categories of personal data or data on criminal convictions and offences.

We carry out these checks when you enter into a relationship with us, but also throughout the relationship we have with you, both on yourself and on the transactions you carry out. At the end of the relationship and if you have been the subject of an alert, this information will be stored in order to identify you and to adapt our controls if you enter into a new relationship with a BNP Paribas Group entity, or in the context of a transaction to which you are a party.

In order to comply with our legal obligations, we exchange information collected for AML/CFT, anti-corruption or international Sanctions purposes between BNP Paribas Group entities. When your data are exchanged with countries outside the European Economic Area that do not provide an adequate level of protection, the transfers are governed by the European Commission's standard contractual clauses and adequate additional measures. When additional data are collected and exchanged in order to comply with the regulations of non-EU countries, this processing is necessary for our legitimate interest, which is to enable the BNP Paribas Group and its entities to comply with their legal obligations and to avoid local penalties.

For the purpose of combating money laundering and terrorist financing, the companies of the BNP Paribas Group exchange data of data subjects related to companies which are clients of the BNP Paribas Group. In the event of such an exchange of data between the companies, we are jointly responsible for the data processing.