

Privacy And Data Protection Policy

Toyota Motor Finance (Netherlands) B.V. ("TMFNL")

1. Introduction

This data protection policy aims to outline the rules with respect to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (PbEU 2016, L 119) (Implementation Act General Data Protection Regulation), which regulation entered into force on 25 May 2018.

TMFNL respects your privacy. Whether you deal with TMFNL as an investor, a customer, an employee, a member of the general public, etc., you are entitled to the protection of your Personal Data. Personal data are all data that are directly about someone or that can be traced back to someone. This data may relate to your name, identification number, telephone number, email address, photographs etc.

In this **Privacy and Data Protection Policy ("this Policy")** we describe how we collect your Personal Data and why we collect it, what we do with your Personal Data, with whom we share it, how we protect it, and the choices you can make about your Personal Data.

This Policy applies to the processing of your Personal Data in the framework of various services, tools, applications, websites, portals, etc. that are provided or operated by us or on our behalf.

This Policy applies to all your Personal Data collected by (or on behalf of) TMFNL, together referred to in this Policy as "**TMFNL**", "**we**", "**us**" and "**our**".

At the end of this Policy, you will find some definitions of certain key concepts used in this Policy.

2. Who is responsible for the processing of your personal data?

The entity which is responsible for the processing of your Personal Data is:

Toyota Motor Finance (Netherlands) B.V.
Zuidplein 90
1077XV Amsterdam
The Netherlands

3. Who can you contact in case you have questions or requests? The data protection contact point

We have organised a Data Protection Contact Point which will handle your questions or requests relating to this Policy, any specific privacy notice, your Personal Data (and its Processing).

For any questions or requests or complaints concerning the application of this Policy or to exercise your rights, as described in this Policy, you may contact us at the Data Protection Contact Point (*not being a data protection officer as described in privacy law as TMFNL does not meet the privacy law conditions that would require such an officer*):

- Toyota Motor Finance (Netherlands) B.V.
Attention: TMFNL Data Protection Contact Point
Zuidplein 90
1077XV Amsterdam
The Netherlands
- E-mail: shirley.pimentel@toyota-fs.com

4. Key principles

We value your Personal Data entrusted to us and we are committed to processing your Personal Data in a fair, transparent and secure way. The key principles TMFNL applies are as follows:

- **Lawfulness:** we will only collect your Personal Data in a fair, lawful and transparent manner.
- **Data minimisation:** we will limit the collection of your Personal Data to what is directly relevant and necessary for the purposes for which they have been collected.
- **Purpose limitation:** we will only collect your Personal Data for specified, explicit and legitimate purposes and not process your Personal Data further in a way incompatible with those purposes.
- **Accuracy:** we will keep your Personal Data accurate and up to date.
- **Data security and protection:** we will implement technical and organisational measures to ensure an appropriate level of data security and protection considering, among others, the nature of your Personal Data to be protected. Such measures provide for the prevention of any unauthorised disclosure or access, accidental or unlawful destruction or accidental loss, or alteration and any other unlawful form of Processing.
- **Access and rectification:** we will process your Personal Data in line with your legal rights.
- **Retention limitation:** we will retain your Personal Data in a manner consistent with the applicable data protection laws and regulations and no longer than is necessary for the purposes for which they have been collected.
- **Protection for international transfers:** we will ensure that any of your Personal Data transferred outside the EEA is adequately protected.

- **Safeguards towards third parties:** we will ensure that Personal Data access by (and transfers to) third parties are carried out in accordance with applicable law and with suitable contractual safeguards.

5. Processing of your personal data: Which personal data do we collect and on which legal grounds?

Whenever we require your Personal Data, we will always clearly inform you which of your Personal Data we collect. This information will be provided to you through a separate privacy notice, if applicable depending on the type of contact, or through registration on our website, or through direct contact with TMFNL.

Please note that in accordance with applicable data protection law, your Personal Data can be processed if:

- you have given us your consent for the purposes of the Processing (as described in the privacy notice related to that particular Processing). For the avoidance of doubt, you will always have the right to withdraw your consent at any time; or
- it is necessary for the performance of a contract to which you are a party; or
- with such Processing, we pursue a legitimate interest that is not outbalanced by your privacy rights; or
- it is required by law.

When you create an account with us, we may process certain personal data to enhance your customer experience and complete your profile. The personal data we may process includes categories such as identity information, contact information, curriculum vitae, private or business email address or sound or images files that you upload onto the platform or the account IP address. We understand the importance of privacy and want to assure you that we do not store pictures or images of our contacts.

Please note that while some categories of personal data are optional for you to upload, providing them can help us tailor our services to better meet your needs.

6. For which purposes we process your personal data

We will only process your Personal Data for specified, explicit and legitimate purposes and we will not process your Personal Data further in a way that is incompatible with those purposes.

Such purpose can be the improvement of your visit on one of our websites or portals, the improvement of our financial products and services more generally, the offering of services or applications etc. This privacy notice will be accessible, for example, on a website or portal, on an application, in an electronic newsletter, etc.

7. Keeping your personal data accurate and up-to-date

It is important for us to maintain accurate and up-to-date records of your Personal Data. Please inform us of any changes to or errors in your Personal Data as soon as possible by contacting us at the Data Protection Contact Point (see section 3 “Who can you contact in case you have questions or requests?”). We will take reasonable steps to make sure that any inaccurate or outdated Personal Data is deleted or adjusted accordingly.

8. Access to your personal data

You have the right to access your Personal Data which we are processing and, if your Personal Data is inaccurate or incomplete, to request the rectification or erasure of your Personal Data. If you require further information in relation to your privacy rights or would like to exercise any of these rights, please contact us at the Data Protection Contact Point (see section 3 “Who can you contact in case you have questions or requests?”).

9. How long do we keep your personal data

We will keep your Personal Data in a manner consistent with applicable data protection law. We will only keep your Personal Data for as long as necessary for the purposes for which we process your Personal Data or to comply with the law. For information on how long certain Personal Data is likely to be kept before being removed from our systems and databases, please contact us at the Data Protection Contact Point (see section 3 “Who can you contact in case you have questions or requests?”).

10. Protecting your personal data

We have a set of technical and organisational security measures in place to protect your Personal Data against unlawful or unauthorised access or use, as well as against accidental loss or damage to their integrity. They have been designed taking into account our IT infrastructure, the potential impact on your privacy and the costs involved and in accordance with current industry standards and practice.

Your Personal Data will only be processed by a third party Data Processor if that Data Processor agrees to comply with those technical and organisational data security measures.

Maintaining data security means protecting the confidentiality, integrity and availability of your Personal Data:

1. **Confidentiality:** we will protect your Personal Data from unwanted disclosure to third parties.

2. **Integrity:** we will protect your Personal Data from being modified by unauthorised third parties.
3. **Availability:** we will ensure that authorized parties are able to access your Personal Data when needed.

Our data security procedures include: access security, backup systems, monitoring, review and maintenance, management of security incidents and continuity, etc.

11. Disclosure of personal data

Depending on the purposes for which we collect your Personal Data, we may disclose it to the following categories of recipients, which will then process your Personal Data only within the framework of these purposes:

1. **Within our organisations and our brand environment:**
 - Our authorised staff members;
 - Our affiliates and subsidiary companies;
 - Our sole shareholder Toyota Financial Services Corporation
2. **Third party business partners:**
 - **Business partners:** for example, trusted companies that may use your Personal Data to provide you with the services and/or the products you requested. We ask such companies to always act in compliance with applicable laws and this Policy and to pay high attention to the confidentiality of your personal information;
 - **Service providers of TMFNL:** companies that provide services for or on behalf of TMFNL, for the purposes of providing such services (for example, TMFNL may share your Personal Data with external providers of IT related services);
3. **Other third parties:**
 - **when required by law or as lawfully necessary to protect TMFNL:**
 - to comply with the law, requests from authorities, court orders, legal procedures, obligations related to the reporting and filing of information with authorities, etc.;
 - to verify or enforce compliance with TMFNL's policies and agreements; and
 - to protect the rights, property or safety of TMFNL and/or its contacts in general;
 - **in connection with corporate transactions:** in the context of a transfer or divestiture of all or a portion of its business, or otherwise in connection with a merger, consolidation, change in control, reorganisation or liquidation of all or part of TMFNL's business.

Please be aware that third party recipients may separately collect Personal Data from you. In such case, these third parties are solely responsible for the control of such Personal Data and your dealings with them will fall under their terms and conditions.

12. Transfers outside the EEA

Your Personal Data may be transferred to recipients which may be outside the EEA, and may be processed by us and these recipients outside the EEA. In connection with any transfer of your Personal Data to countries outside the EEA that do not generally offer the same level of data protection as in the EEA, TMFNL will implement appropriate specific measures to ensure an adequate level of protection of your Personal Data. These measures can for instance consist in agreeing with recipients on binding contractual clauses guaranteeing such adequate level of protection.

13. Your choices and your rights

We want to be as transparent as possible with you, so that you can make meaningful choices about how you want us to use your Personal Data.

- *Your Personal Data*

You may always contact us at the Data Protection Contact Point (see section 3 “Who can you contact in case you have questions or requests?”) to find out what Personal Data we have concerning you and its origin. Under certain conditions, you have the right to receive your Personal Data, which you have provided to us, in a commonly used, structured machine readable format and to transmit your Personal Data to any third party of your choice.

- *Your corrections*

If you find any mistake in your Personal Data or if you find it incomplete or incorrect, you may also require from us that we correct or complete it.

- *Your restrictions*

You have the right to request a restriction on the Processing of your Personal Data (for example, while the accuracy of your Personal Data is being checked).

- *Your objections*

You may also object to the use of your Personal Data for direct marketing purpose (if you prefer, you can also indicate to us through which channel and how frequently you prefer to be contacted by us) or to the sharing of your Personal Data with third party for the same purpose.

You may withdraw your consent at any time to the continued Processing of the Personal Data that you have provided to us by contacting us at the Data

Protection Contact Point (see section 3 “Who can you contact in case you have questions or requests?”).

Moreover, you may require us to erase any data concerning you (except in some cases, for example, to prove a transaction or when required by law).

Finally, please note that you have the right to file a complaint against the Data Controller with the relevant data protection authority (“DPA”).

With respect to TMFNL (as Data Controller), the relevant DPA is the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*).

14. Legal information

The requirements of this Policy do not replace any other requirements existing under applicable data protection law. In case of contradiction between what is written in this Policy and requirements in applicable data protection law, applicable data protection law will have priority.

TMFNL may amend this Policy at any point in time. It was last updated on 21 September 2023. If we change it, the new version will be posted to this website, to keep you fully aware of our processing of your personal data and related matters.

15. Definitions

In this Policy, the following terms have the following meanings:

1. **Data Controller** means the organisation which determines the purposes for which, and the manner in which, your Personal Data is processed.
Unless we inform you otherwise, the Data Controller is TMFNL.
2. **Data Processor** means the person or organisation which processes your Personal Data on behalf of the Data Controller.
3. **Data Protection Contact Point** means the contact point where you can address to the Data Controller your questions or requests regarding this Policy and/or (the Processing of) your Personal Data and which will handle such questions and requests. Unless we inform you otherwise, the Data Protection Contact Point can be reached as described in section 3 “Who can you contact in case you have questions or requests?”).
4. **EEA** means the European Economic Area (= member states of the European Union + Iceland, Norway, and Liechtenstein).
5. **Personal Data** is any data relating to you directly or which allows your identification, such as, for example, your name, identification number, telephone number, email address photographs etc.
6. **Processing** means the collection, accessing and all forms of use of your Personal Data.