

## Privacy Policy

(1) We inform you below about the collection of personal data in business transactions. Personal data is all data that relates to you personally, for example, your name, first name, address, email addresses, payment details, license plates and chassis numbers. The controller in accordance with Art. 4 Paragraph 7 of the GDPR is Garage Krufft; L-6450 Echternach; 96, route de Luxembourg.

(2) The data is collected, stored and may be shared by us, if necessary, to render the contractual services. It is therefore collected, stored and shared for the purpose of performing the contract and on the basis of Art. 6 Paragraph 1 Sentence 1 Letter b of the GDPR. If this data is not provided, it may mean that the contract cannot be concluded.

These contractual services may involve the following purposes, whereby the data that is required in the course of performing the contract is transmitted to the relevant processors:

- To order a new vehicle or in after-sales services, your personal data is transmitted to the importer, the manufacturer and sometimes also to contracted logistics companies.
- For the purpose of returning your old vehicle, your personal data on the vehicle registration form or vehicle invoice may be transmitted, if necessary, to the reseller(s) in order to register the vehicle. Among other things, to enable the registration of the vehicle and the cross-border sale.
- Your personal data is transmitted to the licensing authority when the vehicle is registered or presented, and sometimes also transferred to transport and dispatch service providers.
- Your personal data is given to insurers and their appraisers in order to process claims.
- Your personal data and accident reports are given to your lease company for the purpose of data synchronisation, billing and claims processing.
- Your personal data is given to insurers in order to generate a warranty extension for your vehicle.
- Personal data is transmitted to a service provider for the purpose of determining the residual value and rating of your vehicle. The determined residual value and your personal data are provided to the Leasing companies.
- Your personal data is transmitted to a service provider in order to transmit videos or photographs of damage found on your vehicle.
- Your personal data is given to the contracted superstructure manufacturer or modifier for the purpose of superstructures or modifications on your vehicle.
- Your personal data is given to the relevant service providers for tyre storage or for the collect and return service.
- If we have been requested to arrange financing for you, we disclose your data to the contracted financing company to the extent that this is required to prepare the financing quotation.
- When ordering a charging station, your data will be handed over to authorized companies, service providers and the local energy supply companies for the purpose of checking the requirements and, if necessary, installation on site. The service providers will contact you regarding the on-site appointments

When concluding a rental car contract, the following data will be collected, processed and, if necessary, passed on.

- The rental vehicles are equipped with geo-tracking and other techniques, which could allow an analysis of the driving behaviour, determination of the route and the location.
- We will pass your data on to the insurance company and the investigating authorities in order to ascertain the damage or violations of the Highway Code.
- When concluding a rental car contract, your personal data may be transferred to a service provider. Furthermore, a copy of a photo ID and driver's license will be created and stored.

(3) We process your personal data in order to safeguard our legitimate interests. In addition to the services listed under (2), data processing operations take place with the following interests in mind:

- further development of products, services, services and care offers, as well as other measures to control business transactions and processes;
- Improving product quality, eliminating errors and malfunctions, etc. by analyzing vehicle data and customer feedback;
- Processing of data in a central prospect and customer service platform as well as upstream and downstream systems for customer loyalty and sales purposes for the individual support of customers and prospects;
- processing of warranty and goodwill cases, processing of non-contractual inquiries about prospects and customers as well as concerns;
- Needs analysis and customer segmentation, e.g. Calculation and evaluation of affinities, preferences and potentials;
- Ensuring legally compliant action, prevention of and protection against legal violations (in particular criminal offenses), assertion of and defense against legal claims; to protect businesses;
- Ensuring availability, operation and security of technical systems as well as technical data management.

(4) The recipients of personal data may be third parties acting on our behalf by virtue of specific contractual relationships, manufacturers and importers, distributors belonging to the official network, including banks, insurance companies and accountants.

Any further processing will only be carried out if you have given your consent or if it is permitted by law.

(5) If a data transmission takes place in locations whose seat or place of data processing is not located in a Member State of the European Union or in another Contracting State to the Agreement on the European Economic Area, we ensure before distribution that outside of legally permissible Exceptionally, the recipient either has an adequate level of data protection or you consent to the data transfer.

(6) The transmission of the payment data to the respective payment provider is carried out according to the payment method chosen by the buyer. The responsibility for the payment data lies with the payment provider. The information, in particular the service responsible for the buyer's payment service, the details of data protection officers of payment service providers and the categories of personal data processed by payment service providers, may be obtained from the relevant payment service provider.

(7) We maintain up-to-date technical measures to ensure the protection of personal data. These are always adapted to remain state of the art.

(8) Personal data are only stored as long as is necessary to achieve each purpose, it usually corresponds to the duration of the contract and at least the statutory obligation to preserve, to the extent you have not consented to going beyond storage.

(9) You have the right to request information from us concerning the personal data that we store about you at any time (Art. 15 GDPR). This also relates to the recipients or categories of recipient to which the said data is disclosed and the purpose of storage. Moreover, you have the right to request rectifications under the provisions of Art. 16 GDPR and/or erasure under the provisions of Art. 17 GDPR and/or restriction of processing under the provisions of Art. 18 GDPR. Furthermore, you may request the transmission of the data under the provisions of Art. 20 GDPR at any time. Personal data will only be stored for as long as it is necessary to achieve the respective purpose. This usually corresponds to the duration of the contract and at least the statutory retention obligation.

In the case of processing personal data in order to perform tasks in the public interest, (Art. 6 Paragraph 1 Sentence 1 Letter e GDPR) or to pursue legitimate interests (Art. 6 Paragraph 1 Sentence 1 Letter f GDPR), you may object to the processing of personal data concerning you at any time with effect in the future. In the event of an objection, we must refrain from any further processing of your data for the aforementioned purposes unless:

- there are compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or
- the processing is necessary in order to assert, exercise or defend legal claims.

You may object to the use of your data for the purpose of direct advertising at any time with effect in the future; this shall also apply to profiling to the extent that it is associated with direct advertising. In the event of an objection, we must refrain from any further processing of your data for the purpose of direct advertising.

(10) Please send any requests for information, enquiries about information, withdrawals or objections to data processing to the following email address:

[info.datenschutz@kruft.lu](mailto:info.datenschutz@kruft.lu)

Or by postal mail to:

Garage Kruff  
96, route de Luxembourg  
L-6450 Echternach

Furthermore, you have the option of complaining to the competent regulatory authorities regarding matters concerning your data protection rights.

(11) We reserve the right to modify or modify our Privacy Policy to reflect compliance with changes in legislation, case law, or economic or technical changes. This does not affect the essential provisions of the contractual relationship.