

Information about Data Protection for CLIENTS AND INTERESTED PERSONS at Irizar

Irizar S. Coop. (hereinafter Irizar), is a company in which information transparency is fundamental for establishing relationships of trust with people who are part of our project and with our suppliers and clients. And protecting the personal data of the people who put their trust in us is vitally important. Consequently, with this document we would like to inform you about how we collect and handle or use your data. All of that data is obtained and processed in accordance with European and Spanish data protection regulations.

1. Identity of the Controller of your personal data

Legal name: Irizar S. Coop.

Address: Zumarraga bidea 8 - 20216 Ormaiztegi (Gipuzkoa)

Telephone: 943 80 91 00 - **Email:** irizar@irizar.com

For any issue related with data protection you may contact us at the following email address: lop@irizar.com

2. What kind of data we handle and how we obtain it

Data related with commercial relationships: CLIENTS and PEOPLE INTERESTED in our vehicles and other physical persons related with them who have contact with us. As applicable in each case the data will be:

- Master client data, specifically the company, name, language, job title, sector, affiliations or associations.
- Client identification data: first and last name, data on the national ID card or other equivalent documents, etc.
- Client contact data: Mailing address, email address, telephone number, etc.
- Banking and fiscal data.
- Data related with economic solvency, income and financial situation based on first party statements.
- Vehicle data for accessing our facilities (license number).
- Images obtained with express consent.
- Client interests for marketing activities, in particular events and sending advertising material.
- Vehicle and fleet data for Irizar and other brands.
- Other data related with maintaining a commercial relationship.
- Data for i-Service and online services authentication: In our online services, including websites and applications, we collect data to the extent needed to fulfil our contractual obligations with you. Or you have given your consent.

The term "processing" includes collection, use, sharing and transmitting your personal data that we use, which we obtain directly from the interested parties and which are indispensable for the purposes described in the following paragraph. Accordingly, we will never request or process specially protected data.

We may additionally process personal data we have received legally from other companies in the Irizar Group insofar as needed to fulfil the contract signed with you, for precontractual measures or when you have given your consent to do so.

Furthermore, we obtain data from publicly accessible sources, such as public communication media (the internet, newspapers, magazines) and public registries (Company House). We may also process data provided by the government in order to fulfil our legal obligations.

3. What we use your personal data for (for what purpose)

As a CLIENT or PERSON INTERESTED in Irizar vehicles or services we use the personal data you provide us to provide the services you have hired (coach sales, after sales services), or to provide you with required information including the administrative, fiscal and accounting tasks related with those services. And to keep you up to date about our company, products and services by sending you information and news about our company and business activities, invitations to trade fairs and events.

In addition, and for the sole purpose of building client loyalty and improving the quality of our products and services, personal data may be used for surveys about satisfaction, preferences, hobbies or social networks, etc. and opinions about future improvement and sustainability.

We may also create commercial profiles based on the information you provide that lets us provide products and services that coincide with your needs and interests, collect data about your satisfaction with our products and services or send you personalised messages. In no event will decisions be made automatically based on that profile.

In the event images that you appear in are used, and as long as we have your express consent, we may create advertising or do commercial activities in the sphere related with our industry and spread commercial information about our company.

4. How long we will keep your data

The personal data of physical persons related with clients or potential clients that has been collected using contact forms or information collecting forms will be kept as long as the interested party does not request its deletion.

Data provided directly by our clients will be kept as long as our commercial or mercantile relationship is maintained. In any event, the minimum legal period for keeping the data, depending on the matter, will be respected.

5. What is the legitimate interest for processing your data

The consent of the interested party is the legal basis and legitimate interest to process all personal data provided through contact or information collection forms.

The legitimate interest for data provided for executing contracts and providing services hired, including administrative, fiscal, accounting and billing management is managing our contractual relationship and executing the products or services hired

Data recorded about people who access our facilities for access and security control, on the other hand, is based on the legitimate interest of the management and interests related with evaluating the quality and satisfaction with the products or services received. Nevertheless, we will request your express consent to do so.

6. What third parties will your data be shared with

As necessary for doing our business activities and providing services and solely for the purposes stated in section 3 above, Irizar may share your data with third parties who are physical persons or legal entities, including IT maintenance companies, auditors, accounting, fiscal, financial or other consultants, lawyers or barristers, logistics companies, IT service providers, our network of garages, for guarantees or second hand vehicles, etc. or other foreign or domestic companies in the Irizar Group. We may also share your data to comply with a legal obligation or with authorised government agencies and authorities.

In any event, those third parties must maintain the same level of security as Irizar regarding personal data at all times and, as necessary, they will be bound by legal commitments for the purposes of saving the data in a private and secure way and only use the information under specific instructions from Irizar.

In the framework of the communication specified in the paragraph above, international data transfers may be made to third countries or international organisations for which the European Commission may or may not have made an adequacy decision. International data transfers to countries that cannot guarantee an adequate level of protection will be exceptional and will only be made when it is absolutely necessary to adequately maintain the contractual relationship.

7. What rights do you have over the personal data provided?

Once the personal information is provided, you will have the right to:

- **Right to access:** You can ask any questions and be informed about how we use your data and you can obtain access to it.
- **Right to rectification:** You can rectify your data if it is incorrect or imprecise.
- **Right to erasure:** You can request your data to be erased when, among other reasons, the data is no longer necessary for the purposes for which it was collected.
- **Right to restrict processing:** Your data may only be processed with your consent, except for conserving it and using for exercising or defending against complaints.
- **Right to object:** You may object to the processing of your data. In which case we will stop processing your data, except for compelling legitimate reasons or to exercise or defend against potential complaints.
- **Right to data portability:** You can receive the personal data that belongs to you in a structured commonly used format that is machine readable so you may transmit your data to another data controller.
- You may object to decisions based on the automatic processing of your personal data, such as creating profiles.
- You may withdraw your consent for the purposes stated in section 3 at any time, free of charge and with prospective effect, without that affecting the legality of any processing done with your consent before withdrawing it.

You may exercise these rights at any time by sending a written notice to Irizar S. Coop., en Zumarraga Bidea 8, 20216 Ormaiztegui, Gipuzkoa, or by email at: lop@irizar.com. You must specify which rights you wish to exercise and your request must be accompanied by a photocopy of your national identification card or equivalent document. If you are acting via a legal or voluntary representative you must also include the document that authorises their representation and identification documents for them.

In every commercial message you receive you will have the choice of exclusion by ticking the "Stop receiving commercial communications" option.

In addition, you may lodge a complaint with the control authority, which in this case is the Spanish Personal Data Protection Agency (Agencia Española de Protección de Datos) if you are not satisfied that your rights have been exercised or how they have been exercised. If you want more information about this right and how to exercise it you can contact the AEPD: <http://www.aepd.es/> tel 901100099 and 912663517. C/Jorge Juan, 6 28001-Madrid, Spain