



General Privacy Policy

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Safeguarding the privacy of (the representatives of) our customers, suppliers and visitors of our website www.tip-group.com (the “**Website**”) is important to TIP. This policy (the “**Privacy Policy**”) describes how we collect, use, disclose, transfer and store your personal data. Please take a moment to get to know our privacy practices and let us know if you have questions.

The TIP Trailer Services Group of Companies (“**TIP Group**”) is made up of different legal entities. This Privacy Policy is issued on behalf of TIP Trailer Service Management B.V. (“**TSM**”). Unless otherwise indicated, TSM is the so-called ‘controller’ responsible for the processing of your personal data in this context. For certain processing activities where you interact with a local company affiliated with the TIP Group (a “**TIP Affiliate**”) instead of TSM, the relevant affiliate will be the controller for the processing activities related to such interaction, as further detailed in the table below. The relevant TIP Affiliate is the counterparty mentioned on your signed contract. When we mention “**TIP**”, “**we**”, “**us**”, or “**our**” in the Privacy Policy, we are referring to the relevant company in the TIP Group responsible for processing your personal data, as clarified below.

1. Personal data collection and use

Personal data is information that relates to an identified or identifiable natural person. It does not include anonymous data or data related to legal entities. However, it does include information about individuals who represent or otherwise act on behalf of a legal entity, e.g. employees of our customers and suppliers.

The Website aims to facilitate connections between you and TIP for the provision of its services to you. In that context, you may be asked to provide your personal data to contact TIP or a TIP Affiliate. TIP and TIP Affiliates can exchange personal data and use it for the purposes listed below in accordance with this Privacy Policy. You are not required to provide the personal data we asked for. If you choose not to do this, however, we cannot always offer you (or the legal entity you represent) our products or services, answer any questions you may have or process your application.

2. The personal data collected by TIP

When you create a TIP ID, request a trade credit, purchase a product, download a software update, register for a course at a TIP store, apply for a vacant job position at TIP, contact us or participate in an online survey or use certain other services or website features, we will collect personal data of you.



TIP uses your personal data only for specific purposes. In the table below, you will find an overview of which personal data TIP collects from you, for which purposes we collect the data, on which legal grounds we process your personal data, from which sources it originates and how long we retain your personal data. Note that we may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

In some cases, we may use your personal data to pursue legitimate interests of our own or of third parties, provided your interests and fundamental rights do not override those interests. Where we rely on legitimate interests, we have balanced our interests against your rights and freedoms and are satisfied that our interests do not override your rights.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you separately and we will explain the legal basis which allows us to do so.



Purpose	Personal data	Legal ground	Source	Retention period (*)
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<p>To keep you informed of new product announcements, software updates, and upcoming events from TIP. (TSM and TIP Affiliate purpose)</p>	<ul style="list-style-type: none">• Name• E-mail address• Phone number• Country	<ul style="list-style-type: none">• Your consent (TSM or TIP Affiliate as controller or joint controllers, depending on the marketing initiatives); or• Necessarily for the purposes of our legitimate interests, namely to maintain and develop our customer relationships by providing services meeting our customers' business needs (TSM or TIP Affiliate	<ul style="list-style-type: none">• You;• Salesforce	<p>As long as necessary for the purpose of customer communications</p>
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		as controller or joint controllers, depending on the marketing initiatives).		
To confirm an identity, to identify users and to determine the appropriate services (TSM and TIP Affiliate purpose).	<ul style="list-style-type: none"> • Name • Email • Phone • Role 	Necessary for our legitimate interests, namely allowing customers to access customer facing electronic services (TSM or TIP Affiliate, depending on whether the customer relationship is global or local)	<ul style="list-style-type: none"> • You; • Salesforce 	7 years
To check customers and supplier against watchlists for KYC/KYS and apply our AMLAT policy (TSM and TIP Affiliate purpose).	<ul style="list-style-type: none"> • Customer or Supplier Contact Name • Customer or Supplier E-mail address • Customer or Supplier Phone number • Customer or Supplier Address • Customer or Supplier Location 	Necessary for compliance with a legal obligation (TSM or TIP Affiliate, depending on whether the customer / supplier relationship is global or local)	<ul style="list-style-type: none"> • Customer representatives • Public databases • KYC Solution Service Providers • Public Authorities 	7 years



<p>To send important notifications, such as messages about purchases and changes to our terms and policy (TSM and TIP Affiliate purpose).</p>	<ul style="list-style-type: none"> • Name • Email address • Phone • Country 	<p>Necessary for our legitimate interests, namely for running our business, to keep our records updated and to respond to your questions and comments ((TSM or TIP Affiliate, depending on whether the customer / supplier relationship is global or local).</p>	<ul style="list-style-type: none"> • You; • Salesforce 	<p>7 years after document has lost its notification value[i]</p> <p>[i] See e.g. Section 2:10 DCC, Section 3:15i DCC, Section 52 State Taxes Act</p>
<p>Auditing, data analysis and research to improve products, services and customer communication from TIP (TSM and TIP Affiliate purpose).</p>	<ul style="list-style-type: none"> • Name • Email address • Phone • Country 	<p>Necessary for our legitimate interests, namely to keep our website updated and relevant, to develop our business (TSM or TIP Affiliate, depending on whether the customer relationship is global or local).</p>	<p>Salesforce</p>	<p>7 years</p>



To administer promotions, if you participate in such programs (TSM and TIP Affiliate purpose).	<ul style="list-style-type: none">• Name• E-mail address• Phone number• Address	Necessary for our legitimate interests, namely to study how customers use our products/services, to develop and grow our business (TSM or TIP Affiliate, depending on whether the customer relationship is global or local).	<ul style="list-style-type: none">• You;• Salesforce	As long as necessary for the purpose of customers communications
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<p>For the purposes of job applications, to review and assess the candidate information (TSM and TIP Affiliate purpose)</p>	<ul style="list-style-type: none"> • Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses • Date, country, region and/or city of birth • Gender • Nationality and citizenship status • Disability information (where mandatory / voluntarily disclosed) • Marital status and dependants • Bank account details, payroll records and tax status information. • Salary, annual leave, 	<p>Consent (TSM and TIP Affiliate, for recruitments requiring TIP Group involvement; TSM or TIP Affiliate for local recruitments, depending on which entity is recruiting for the role)</p>	<ul style="list-style-type: none"> • You; • External recruiters; • Social media such as LinkedIn; • Previous employer; • Software and other recruitment tool providers. 	<p>Up to four weeks after your job application is finalized, unless you have given your consent to retain your personal data, in which case we may keep your personal data up to one year after your job application is finalized.</p>
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	<p>pension and benefits information</p> <ul style="list-style-type: none">• Start date, leaving date and your reason for leaving• Location of employment or workplace• Copy of identification documentation• Employment records (including job titles, work history, working hours, holidays, training records and professional memberships)• Compensation history Performance information Disciplinary and grievance			
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<p>To allow customers to access our electronic signature system (TSM and TIP Affiliate purpose).</p>	<ul style="list-style-type: none"> • Personal contact details such as name, e-mail address, phone number, address • Location • Job Title 	<p>Necessary for our legitimate interest to grant access to digital resources needed by the customers to enter into agreements with us (TSM or TIP Affiliate, depending on which entity of the TIP Group the agreement is being entered into with)</p>	<ul style="list-style-type: none"> • Employment documents filled in by you • Workday • DocuSign 	<p>Maximum 7 years</p>
<p>To provide a global Customer Relationship Management (CRM) system whereby key customer and deal data is collected and stored (TSM and TIP Affiliate purpose).</p>	<ul style="list-style-type: none"> • Personal contact details such as name and phone number • Role 	<p>Necessary for the purposes of our legitimate interests, namely to maintain customer relationships and manage sales activities effectively (TSM or TIP Affiliate, depending on whether the customer / supplier relationship is global or local).</p>	<p>Salesforce</p>	<p>Maximum 7 Years</p>
<p>To collect, analyse and distribute statistics and data throughout the TIP group to guide strategic decisions (TSM purpose).</p>	<ul style="list-style-type: none"> • TIP's collector name • TIP Sales Person Name 	<p>Necessary for the purposes of our legitimate interests, namely to collect, analyse and distribute statistics and data to guide strategic business decisions.</p>	<p>Salesforce</p>	<p>Maximum 7 Years</p>



<p>To provide a telematic fleet management system (“FMS”) which relies on data generated by FMS devices installed on the equipment leased by the customer to facilitate the control over, monitoring of and real-time communication with the equipment by the customer. TIP does not have the ability to link the data collected by the FMS devices in any way, directly or indirectly, with an identified or identifiable natural person. The only exception is in the case of truck telematics where confirmation of an appropriate drivers’</p>	<ul style="list-style-type: none"> • geo-location information • driving information relating to speed, direction, harsh braking, harsh accelerating, harsh cornering, mileage, electronic braking system (“EBS”) odometer and/or GPS (or a combination of the EBS odometer and GPS) • activity status information (moving or standing still) • axle load information • volumetric • tyre pressure monitoring system (“TPMS”) information • refrigeration 	<p>Necessary for the purposes of our legitimate interests, namely to monitor and maintain our leased equipment, ensure optimal fleet performance, and provide functional equipment to our customers (TSM or TIP Affiliate, depending on whether the customer relationship is global or local).</p>	<ul style="list-style-type: none"> • Vehicle • OEM • Telematics device 	<p>24 months</p>
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<p>license is required by law to rent the truck (TSM and TIP Affiliate purpose)</p>	<p>engine or other ancillary engine unit running hours</p> <ul style="list-style-type: none"> • geofencing entry/exit alerts general 			
<p>To provide document storage and management tools (TSM and TIP Affiliate purpose)</p>	<ul style="list-style-type: none"> • Personal contact details such as name, e-mail address and phone number • Electronic identifier needed for SSO 	<p>Necessary for the purposes of our legitimate interests, namely to enable efficient business operations and collaboration (TSM or TIP Affiliate, depending on whether the customer relationship is global or local)</p>	<p>Document management system (e.g., SharePoint/similar platform)</p>	<p>Maximum 7 years</p>



<p>To provide a global Automated Leasing System (ALS) which performs check in/check out services and service orders (TSM and TIP Affiliate purpose).</p>	<ul style="list-style-type: none"> • Personal contact details such as name, e-mail address and phone number • Role • Electronic identifier needed for SSO 	<ul style="list-style-type: none"> • Necessary for the purposes of our legitimate interests, namely ensuring the efficient and secure management of our leasing operations (for TSM or TIP Affiliate, depending on whether the leased assets are locally or globally administered). 	<p>ALS</p>	<p>Maximum 7 Years.</p>
<p>To maintain Matrix Supplier side system stored in FleetMaintenance to be able to find the correct contact person for the Supplier contracts (TSM and TIP Affiliate purpose).</p>	<ul style="list-style-type: none"> • Personal contact details such as name, e-mail address and phone number • Role • Electronic identifier needed for SSO 	<p>Necessary for the purposes of our legitimate interests, namely to maintain supplier contact information and manage supplier relationships (for both TIP Affiliate and TSM, depending on whether the supplier relationship is locally or globally administered).</p>	<p>FleetMaintenance System</p>	<p>Maximum 7 Years.</p>



<p>To maintain Matrix Customer side system utilizing Customer Master (TSM and TIP Affiliate purpose).</p>	<ul style="list-style-type: none"> • Personal contact details such as name, e-mail address and phone number • Role • Electronic identifier needed for SSO 	<p>Necessary for the purposes of our legitimate interests, namely to maintain customer contact information and manage customer relationships (for both TSM and TIP Affiliate, depending on whether the customer relationship is locally or globally administered).</p>	<p>Customer Master system</p>	<p>Maximum 7 Years.</p>
<p>Ensure network and information security, including preventing unauthorised access to our systems and infrastructures and prevent fraud (TSM purpose)</p>	<ul style="list-style-type: none"> • Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses • CCTV footage and other information obtained through electronic means such as logs. • Information 	<p>Necessary for the purposes of our legitimate interests, namely to ensure network and information security and prevent unauthorised access to our systems and infrastructure and to prevent fraud.</p>	<ul style="list-style-type: none"> • Electronic monitoring systems • IT systems logs • CCTV systems 	<p>Maximum 1 year. The data may need to be kept longer in cases where this would be necessary to fulfil other legal retention duties.</p>



	about your use of our information and communications systems and infrastructure.			
*Note: the retention periods above are for personal data held by TSM. The retention periods applicable to data held by TIP Affiliates is subject to local laws and will be provided separately.				

3. Marketing

We may use your personal data to send you marketing communications on our products, services and offers that may be relevant for you. You will receive marketing communications from us only if you have given your consent thereto or purchased goods or services from us and, in each case, you have not opted out of receiving marketing communications.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at dataprivacy@tip-group.com.

4. Integrity and retention of personal data

TIP takes appropriate efforts to keep your personal data accurate, complete and current. We will retain your personal data only as long as necessary for the purposes described in this Privacy Policy, unless a longer retention period is required or permitted.

5. Disclosure to third parties

We do not sell, trade, or otherwise transfer your personal data to outside parties unless we provide users with advance notice and an opportunity to consent or opt out. We do share your personal data with our website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users. To the extent that these third parties process your personal data on our behalf, we ensure that we have data processing agreements in place which require such third parties to protect your personal data.



We may also release information when the release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety. We may also disclose your information if we believe it is necessary or appropriate in the context of national security, law enforcement or other matters of public interest. In addition, we disclose your information if we determine that it is reasonably necessary to enforce our terms and conditions or protect our operations or users. Moreover, we may in a reorganization, merger or sale, transfer any personal data we collect to the relevant third party.

6. How do we protect your personal data?

TIP takes the security of your personal data very seriously. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Further, online Services from TIP such as the TIP Web Store and TIP Website or affiliated Web Store process your personal data securely during transmission with encryption such as TLS (Transport Layer Security). If your personal data is stored with TIP, we use computer systems with limited access in locations with physical security. TIP eServices data is stored in encrypted form, even if we have storage facilities of third parties.

If some TIP products, services or programs use messages or post on a TIP forum, a chat room, or on a social network, the personal data and the content you share may be visible to and can be read, collected or used by other users. You are responsible for the personal data you share in this regard. For example, your name and e-mail address displays in a forum post, which information is public. Be careful when using these functions.

We communicate our privacy and security guidelines to all TIP employees and maintain strict privacy safeguards within the TIP Group to ensure the safety of your personal information.

7. Your rights

You have the following rights with regard to your personal data:

The right to request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

The right to request to correct erroneous data. You may also supplement any incomplete data we have, taking into account the purposes of the processing.



The right to request deletion of your data if:

- your personal data is no longer necessary for the purposes for which we collected or processed them;
- you withdraw your consent if the processing of your personal data is based on consent and no other legal ground exists;
- you object to the processing of your personal data and TIP does not have an overriding legitimate ground for processing;
- your personal data is unlawfully processed; or
- your personal data has to be deleted for compliance with a legal obligation.

The right to object to the processing of your personal data. We will comply with your request, unless we have a compelling overriding legitimate interest for processing or we need to continue processing your personal data to establish, exercise or defend a legal claim.

The right to restrict the processing of personal data, if:

- the accuracy of your personal data is contested by you, for the period in which TIP has to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the deletion of your personal data and requests restriction; or
- TIP no longer needs your personal data for the purposes of processing, but your personal data is required by you for legal claims; or
- you have objected to the processing, for the period in which TIP has to verify overriding legitimate grounds.

The right to data portability. You may request us to receive the personal data that concern you. You may also request us to send this personal data to a third party, where feasible. You only have this right if it regards personal data you have provided to us, the processing is based on consent or necessary for the performance of a contract between you and us, and the processing is done by automated means.

The right to withdraw your consent if the processing of your personal data is based on your consent.

You can exercise your rights by submitting a request per e-mail to our Data Protection Officer (DPO), Mr. Curt Fall, who can be contacted by email at dataprivacy@tip-group.com. TIP shall handle this request within one month after receiving the request, but we may extend this term with another two months for complex requests.

All email messages sent to and from TIP may be monitored to ensure compliance with internal policies and to protect TIP's interests.



You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request.

8. Children

Children are not intended to be using or receiving TIP Technology Products or services. Therefore, we will not knowingly collect, use or disclose personal data from children under 16, or equivalent minimum in the relevant jurisdiction, without the explicit consent of the parent. If we discover that we have personal data of a child under 16, or equivalent minimum depending on the jurisdiction, without obtaining explicit parental consent, we will take the appropriate steps to delete this data as soon as possible. Children under 16, or equivalent minimum in the relevant jurisdiction, may not create a TIP ID.

Should a parent wish to exercise their rights with regard to the processing of personal data of their children by TIP, they can contact us at: dataprivacy@tip-group.com.

9. Storage of personal data

We may store your personal data outside the European Economic Area (EEA). To the extent that we transfer and store personal data to a third country, we will implement appropriate safeguards to protect the personal data.

In case of international transfers of your personal data from the EEA to a non-EEA country, such transfers will be conducted on the basis of the determination by the European Commission that the relevant non-EEA jurisdiction, or sector within that jurisdiction, ensures an adequate level of data protection, if any.

For transfers to non-EEA countries or sectors not recognised by the European Commission as providing adequate level of protection, we will either rely on an applicable derogation adapted to the specific circumstances or implement one of the following safeguards to maintain the security of your personal data:

- standard contractual clauses approved by the European Commission; or
- binding corporate rules.

To obtain a copy of these safeguards or details on where they are available, you can send a request to the above contact point.



10. Sites and services of third parties

Websites, products, applications and services of TIP may contain links to websites, products, and services from third parties. Our products and services may also use or offer products or services from third parties, such as a TIP Technology Product program from a third party. We do not control these third-party websites and are not responsible for their privacy policies. We recommend you to take notice of the privacy policies of these third parties.

11. Privacy Questions

If you have questions or concerns about TIP's Privacy Policy or data processing or if you wish to complain about a possible breach of local privacy laws, please contact us using the contact details set out under section 7 above. Alternatively, you can always call us on the phone number listed on the TIP homepage for your country, accessible [here](#).

Our full details are:

Name: TIP Trailer Services Management B.V.

Email: dataprivacy@tip-group.com

Postal address: De entree 33, Alpha Tower, 1101BH Amsterdam

All your complaints are investigated and answered as soon as possible if any.

You have the right to lodge a complaint with the relevant data protection authority. We would, however, appreciate the chance to deal with your concerns before you approach the data protection authority, so please contact us in the first instance.

TIP's Privacy Policy may be changed occasionally. If the policy is amended, we will inform you thereof and a notice will be placed on our website.