

This Privacy Notice explains how personal data (“Data”) of representatives, managers, guarantors, beneficial owners, shareholders (natural persons only) and successors of our Client (“Data Subjects”) is handled by the Controller (“we”, “us”, “our”, “Controller” or the “Company”) listed in section of this Privacy Notice, in compliance with applicable laws and regulations. We are committed to protecting and respecting Data Subject’s privacy.

### **1. HOW WE OBTAIN DATA**

We may collect, process and store some Data, such as:

- a) Identification and Contact Data
- b) Professional Data
- c) Judicial Data
- d) Economic, Property, Financial, Insurance Data

Ordinarily, Data will be provided to us by the Data Subjects, but in some cases, Data may be provided to us by the employees and representatives granted by the power of attorney to act for the Data Subjects, and we may collect Data from a third party or from public records. We protect Data obtained from such third parties according to the practices described in this privacy notice.

### **2. HOW WE USE DATA**

Data collected may be processed by us for the following purposes:

- i. Performing contracts and/or service agreements in place or to be entered into;
- ii. Pursuing our interest to establish, maintain and improve our relationship with our Client, as well as the delivery of our products and services;
- iii. Fulfilling the activities requested by the applicable laws and regulations (such as anti-money laundering checks);
- iv. protecting our interests in case of disputes or complaints.

Data is collected and processed on the basis of the contract for the processing under point (i) and (ii) and our explicit and legitimate interest for the processing under point (iii) and (iv).

Data may be processed electronically within IT systems, and manually, in paper form. Data will be processed and stored for its whole lifecycle, ensuring security and confidentiality of the same in compliance with principles of fairness, lawfulness and transparency and in accordance with the provisions of applicable laws and regulations.

### **3. CONSEQUENCES OF FAILURE TO PROVIDE DATA**

Submitting Data is never mandatory. However, not providing Data that is necessary to meet the purposes described in this Privacy Notice may prevent the Customers to fulfil an agreement with us, or may prevent us from complying with legal obligations.

### **4. HOW WE SHARE DATA**

We are part of the IVECO Group, a global leader in the capital goods sector. Data may be shared and communicated to our subsidiaries and affiliates of the IVECO Group, trusted external parties, service providers, authorized dealers, distributors, external factors, financial institutions and business partners, based in and outside the European Union, which are under specific contractual terms and may use it solely for the fulfillment of the purposes listed in clause 2.i above.

Data may be communicated to third parties for the fulfillment of the purposes listed in clause 2.iii and 2.iv above, to operate and maintain our and the IVECO Group security, protect our and the IVECO Group rights or property, to respond to order of Public Authorities, or to exercise our rights before judicial authorities.

## **5. HOW WE TRANSFER DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)**

In order to perform Data processing activities as detailed above, we may transfer Data in countries outside of the European Economic Area (EEA), including storing such Data in digital or physical databases managed by entities acting on our behalf. Database management and Data processing are limited to the purposes of the processing and are carried out according to applicable data protection laws and regulations.

In case Data are transferred outside of the EEA, the Company will use any appropriate contractual measures to guarantee adequate protection of the Data, including – among others – agreements based on Standard Data Protection Clauses adopted by the EU Commission applicable to the transfer of personal data outside the EEA.

In addition to the adoption of legitimate mechanisms for the data transfer outside the EEA, the IVECO Group's affiliates and subsidiaries in the U.S. participate to the Privacy Shield program and, therefore, are also committed to act in compliance with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks and the CNH Industrial Privacy Shield Policy, available here: [https://www.cnhindustrial.com/en-us/governance/policies\\_and\\_guidelines/Pages/corporate\\_policies.aspx](https://www.cnhindustrial.com/en-us/governance/policies_and_guidelines/Pages/corporate_policies.aspx)

## **6. RETAINING DATA**

We maintain Data in our systems and archives for as long as necessary to pursue the purposes described in this Privacy Notice taking into account, when applicable, legal and contractual requirements.

When Data is no longer necessary for the purposes for which it is processed, Data is deleted or kept in a form which does not permit the identification of data subjects, provided that we are not legally required or permitted to hold such Data. We may continue to store Data for a longer period, as may be necessary to protect our interests related to potential liability connected to the provision of the services or products or the processing of Data.

## **7. DATA CONTROLLERS**

IC Financial Services S.A., with registered office in 16-18 Rue des Rochettes, 91150 Morigny-Champigny, France is the Controller for the Data it collects, processes and stores in the framework of this Privacy Notice.

IC Financial Services S.A. has appointed a Data Protection Officer. The contact information of the Data Protection Officer is as follows:

IC Financial Services S.A.  
Data Protection Officer  
16-18 Rue des Rochettes,  
91150 Morigny-Champigny,  
France

Email: [dataprotection-financialservices@cnhind.com](mailto:dataprotection-financialservices@cnhind.com)

Iveco Capital Solutions S.p.A., with registered office in Via Puglia n. 35, Torino, Italy is the Controller for the Data it collects, processes and stores in the framework of this Privacy Notice.

CNH Industrial Capital Limited, with registered office in Cranes Farm Road, Basildon, Essex, SS14 3AD, United Kingdom is the Controller for the Data it collects, processes and stores in the framework of this Privacy Notice.

If a credit is assigned (factoring) to another company of IVECO Group, the Controller shares and communicates the Data to such a company of IVECO Group, which will act as autonomous controller.

## 8. DATA SUBJECT RIGHTS

Data Subjects may exercise their rights as defined by applicable laws and regulations, among these:

- Right of access: right to obtain from the Controller a confirmation as to whether or not Data is being processed, and, if so, to demand to gain access to this Data.
- Right to rectification: right to obtain from the Controller the rectification of Data considered inaccurate and to have incomplete information being completed, including by means of providing a supplementary statement.
- Right to erasure: right to obtain from us the erasure of Data without undue delay, where the request is made in accordance with the applicable laws and regulations.
- Right to object to data processing: right to object at any time to the processing of Data, unless the Controller demonstrates compelling legitimate grounds for the processing which override this right.
- Right to limit the data processing: right to obtain from the Controller a limitation on the processing activities when the accuracy and the precision of Data is disputed, and for the time necessary for the Controller to verify the accuracy of Data.
- Right to data portability: right to receive the Data provided to the Controller in a structured, commonly used and machine-readable format. Data Subjects also have the right to transmit that Data to another data controller without hindrance from the Controller, especially following these conditions: the processing is based on consent or on a contract and the processing is carried out by automated means.
- Right to make a complaint: without prejudice to any other administrative or judicial dispute, if Data Subjects believe the data processing has been carried out illicitly or not compliant with applicable laws and regulations, they have the right to raise a complaint with the Supervisory Authority of the Member State in which they reside or work habitually, or of the State where any breach has occurred.

Data Subjects can exercise the abovementioned rights by contacting us as follows:

- Filling the online form you can find here: <https://privacy.cnhindustrial.com/it-it/footer/Pages/form.aspx>
- Sending a letter to the Controller at the address indicated in the section 7 of this Privacy Notice, specifying “for the attention of Privacy Compliance”, if possible by attaching the standard form that you can download from here: <http://www.cnhindustrial.com/en-us/footer/Pages/DSRDC.aspx>
- Writing an email to [privacy-compliance@cnhind.com](mailto:privacy-compliance@cnhind.com), if possible by attaching the standard form that you can download from here: <http://www.cnhindustrial.com/en-us/footer/Pages/DSRDC.aspx>

In case a Data Subject submits a request, we may need to obtain additional personal information from Data Subjects to verify their identity and contact them, if necessary. This information, together with other Data we already withhold, will then be processed to meet Data Subject’s request, as required by applicable law. Where necessary, certain information may be transferred to other companies within or outside the CNH Industrial Group that act as data processors, in order to comply with the request. Data will be processed for the necessary amount of time to evaluate and handle the request, after which Data will be archived for a suitable time period allowing us to demonstrate that the request has been handled correctly and timely.

## **9. UPDATES TO THIS PRIVACY NOTICE**

This Privacy Notice was drafted in November 2021. We reserve the right to amend or update the Privacy Notice from time to time to reflect changing legal requirements or our processing activities.

**ANNEX A**  
LIST OF CONTROLLERS

The IVECO Group companies listed below may act as autonomous controller of your Data for the purposes described in this Notice.

| <b>Company Name</b>                   | <b>Registered Office</b>                                     | <b>Data Protection Officer (if any)</b>   |
|---------------------------------------|--|---|
| <b>IC Financial Services S.A.</b>     | Morigny-Champigny, 16-18 Rue des Rochettes 91150 - France    | Délégué à la protection des données (DPO)<br>16-18 rue des Rochettes<br>1150 Morigny Champigny<br>France<br>Email: <a href="mailto:dataprotection-financialservices@cnhind.com">dataprotection-financialservices@cnhind.com</a> |
| <b>Iveco Capital Solutions S.p.A.</b> | Torino, Via Puglia n. 35 - Italy                             |   |
| <b>CNH Industrial Capital Limited</b> | Basildon, Cranes Farm Road, Essex, SS14 3AD - United Kingdom |   |