

## Privacy Policy

Subaru values your privacy and is committed to protect your personal data in accordance with applicable privacy laws.

Subaru Europe NV/SA (hereafter 'Subaru' or 'We') registered at Leuvensesteenweg 555b8, 1930 Zaventem in Belgium, telephone +3227140300, is the data controller of your personal data. The purpose of this Privacy Policy is to inform you on how we collect and use your personal data.

### 1. What categories of personal data do we process?

The categories of personal data that we may collect and process include:

- contact information that allows us to communicate with you, such as your name, e-mail address, mailing address, home and work phone numbers;
- relationship information that helps us do business with you, such as the types of products and services that may interest you, contact and product preferences, languages, creditworthiness, marketing preferences and demographic data;
- website information, such as the type and language of the browser, behavioral information from cookies, your computer operating system, and your computer's Internet Protocol address.

We have no intention to collect any personal data of visitors of our website that are younger than 16 years. We recommend parents to be involved in the online activities of their children to prevent that Subaru processes their personal data.

### 2. Which legal basis do we process your personal data on?

We may collect and process your personal data based on the following legal grounds:

1. Consent
2. Performance of a contract with you
3. Legal obligation
4. Performance of a task of general interest
5. Legitimate interest of Subaru or any third party

When we process personal data based on your consent, you will have the right to withdraw this permission at all times. To exercise this right to withdraw please see section 7 for further details.

### 3. Why do we process your personal data?

Subaru uses your personal data to send you from time to time information or updates on products and services, promotions and other marketing materials.

Your personal data is also used to facilitate Subaru's online operations, to understand our website usability and performance and to maintain and improve the services offered on our website.

We may collect and process your personal data based on the following legal grounds: your given consent or on the legitimate interests of Subaru, which are our usual business activities.

#### **4. Who receives my personal data**

In connection with the purposes described above in section 3, we may need to share your personal data with the following recipients:

- Service providers: Subaru sometimes uses third parties, such as marketing companies or IT service providers, to perform tasks on its behalf and may need to share your personal data with them to provide the services described in article 3. Any processing of that personal data will be on our instructions and in line with the original purposes.
- Authorized distributors or dealers: your personal data might be shared with your nearest Subaru authorized distributor or dealer to establish a quick and more flexible connection to fulfill your request.
- Legal obligations: as required by law, Subaru may disclose your personal data to law enforcement officials, in order to comply with legal requirements, court orders, government or law enforcement agency requests, including to meet national security or law enforcement requirements, and including to agencies and courts in the countries where we operate. Where permitted by law, we may also disclose such information to third parties (including legal counsel) when necessary for the establishment, exercise or defense of legal claims or to otherwise enforce our rights, protect our property or the rights, property or safety of others, or as needed to support external audit, compliance and corporate governance functions.
- Mergers and acquisitions: your personal data may be transferred to a party acquiring all or part of the equity or assets of Subaru or its business operations in the event of a sale, merger, liquidation, dissolution, or other.

#### **5. Do we transfer your personal data outside of the EEA?**

Due to the global nature of our business, we may transfer your personal data to entities (recipients) located in countries outside of the EEA, which do not offer adequate protection of personal data. In such cases, we take measures to ensure that your personal data has an adequate level of protection, which include Standard Contractual Clauses to protect your personal data.

The transfer of your data to third parties as mentioned above will only happen for the purposes mentioned in this Privacy Policy, and only to the extent that this is permitted by this Privacy Policy and applicable laws and regulations, or if Subaru is obliged to provide personal data to a competent authority.

#### **6. How do we keep your personal data secure?**

Subaru applies the necessary technical and organizational countermeasure to protect your personal data from any unauthorized access or disclosure, accidental or unlawful destruction or accidental loss or alteration.

## **7. What are your rights?**

You have at any time the right to object to the use of your personal data for the purposes mentioned in article 2.

Besides, you can make use of the following rights:

- the right to access your personal data;
- the right to rectification of your personal data;
- the right to erasure of your personal data;
- the right to restriction of processing of your personal data;
- the right to object to the processing of your personal data;
- the right to data portability of your personal data;
- the right to open a claim at the privacy commission;
- the right to withdraw any previously given consent.

If you want to exercise any of the afore-mentioned rights, please read in section 8 on how to contact us.

## **8. How can you contact us?**

In case you have any questions regarding this Policy and/or the protection or processing of your personal data, or if you want to exercise any of the rights explained in article 5, please contact us at:

Subaru Europe NV/SA - [privacy@subaru.eu](mailto:privacy@subaru.eu)

In the event that Subaru receives your inquiry, your personal data will only be used for the purposes of responding to your inquiry.

The use of this website is subject to this privacy policy. By providing personal data to us, you understand and agree to the collection, processing, international transfer and use of such information as set forth in this privacy policy. Where required by applicable law we will ask your explicit consent.

## **9. How long do you keep personal data?**

We retain your personal data in accordance with our internal data retention policy and/or no longer than necessary for the purposes for which they were collected (see section 2) or as required by applicable law.

## **10. Do we process cookies?**

If you visit our website we may use cookies, subject to your consent where required, web beacons and other similar technologies to save some information with the goal of personalizing our advertising and to provide you a better, faster and safer customer experience. If you don't want to use cookies, then you can refuse them. For more details

about the usage of cookies on our website, please read our Cookie Policy ([www.subaru.eu/cookies](http://www.subaru.eu/cookies)).

### **11. Changes to this Privacy Policy**

Without limiting your rights as described in this Privacy Policy, Subaru reserves the right to alter or otherwise update this Policy at any time. When Subaru makes changes to this Policy, the date of the occurrence of such changes will be indicated on this website.

Previous versions can be consulted here:

*No previous versions*

This Privacy Policy was last revised on 15/05/2018.