



## **PRIVACY POLICY FOR PNO**

This Privacy Policy has been laid down by PNO Sverige AB, PNO Trailer Oy, PNO Norge AS, PNO Danmark A/S and PNO Nederland B.V. (collectively referred to as "PNO", "we", "us" or "our" in this Privacy Policy) and applies to the PNO business.

### **1. About PNO**

PNO is the Nordic region's leading leaser of trailers, with a fleet of more than 10,000 trailers. Our head office is in Copenhagen, and we have branches in Helsinki, Helsingborg, Oslo, Horsens and Venlo.

As part of the operation of the PNO business, PNO collects and processes personal data for the purposes described in this Privacy Policy. PNO is the controller for the processing of the personal data for such purposes.

If you have any questions relating to this Privacy Policy or the processing by PNO of personal data as part of the operation of our business, please contact us using the following contact details:

PNO Holding A/S  
Sturlasgade 3, 2  
DK-2300 Copenhagen S  
Danish CVR no. 26 10 14 09  
Email: [info@pnorental.com](mailto:info@pnorental.com)

### **2. We care about privacy and data protection**

We consider responsible handling of personal data collected as part of the operation of our business to be essential to our business aim and reputation. This Privacy Policy explains how your personal data are collected and used if you are a customer of PNO and how you may obtain access to your own personal data.

### **3. What are personal data?**

Personal data are any information concerning an identified or identifiable natural person. An identifiable natural person means a person who can be identified, directly or indirectly, in particular by reference to an identifier, e.g. a name, an identification number or one or more factors specific to the identity of a given person.



#### **4. What types of personal data do we process about you and why?**

The data we collect about you will be used for various purposes in connection with your customer relationship and the operation of the PNO business. The data collected may vary depending on whether you are a customer, supplier or business partner, but will generally be data relating to customer management and supplier management and data relating to PNO's rights and obligations.

Any failure by you to provide personal data may mean that we at PNO will be unable to fulfil our obligations relating to your customer or supplier relationship.

PNO collects and processes general personal data only in connection with your customer or supplier relationship with PNO.

PNO will typically collect the following data:

##### **Data about our customers**

Data that you provide to us when becoming a customer of PNO, including contact details (name and address of the enterprise), your marketing or communication preferences, and data that you provide to us when contacting us to ask a question or to report a problem or generally as part of your customer relationship with PNO.

##### **Data about our suppliers and business partners**

Data that you provide to us in connection with the conclusion of a supply or cooperation agreement, including contact details (workplace, job title, first name, middle name(s), last name, address, telephone number and email address), data that you provide to us on your marketing or communication preferences, and data that you provide to us when contacting us to ask a question or to report a problem or generally as part of our cooperative relations.

##### **Data that we collect and process when you visit our website**

Data on the way you navigate to and between our websites and the resources you access, information on your computer, device and browser, including in some instances your IP address, browser type, and other hardware and software information. If you access our website from a mobile device, we may also collect the unique identification number of your device.



## **Data that we collect and process through the GPS on our trailers**

We are installing a GPS tracking device on all our trailers to be able to track the location, and to collect technical information the trailers. In this connection we collect and process data about the trailers' location and to some extent your drivers' location as well as technical information about the trailers'.

## **5. Use of your personal data**

PNO processes your personal data for the purposes set out below. Please note that not all the specified purposes, categories of data, recipients of data or types of processing of data will in all instances apply to you.

PNO processes your personal data solely to the extent necessary in connection with your customer or supplier relationship or cooperative relations (in each case taking any interests into account) or according to current law.

**Customer relationship management** – Creation and management of your customer relationship with PNO as part of the operation of the PNO business, including invoicing, debt collection, marketing, statistics, etc. All statistics and analyses will be prepared in anonymous form and so do not contain data directly attributable to you as a natural person. Furthermore, in connection with the customer relationship management, PNO may process data about our customer contact persons.

**Supplier relationship and cooperative relations management** – PNO processes your personal data as part of the management of supplier relationships and/or cooperative relations where you are a supplier or business partner or a contact person of a supplier or business partner with which PNO has business relations as part of the operation of our business, including the maintenance of our CRM register containing information about our contact persons for our suppliers and business partners.

**Operation and maintenance of our websites** – The provision of our online services at our websites, including to support the ongoing evaluation and improvement of our websites.

**Compliance with current laws and regulations** – The compliance with laws and regulations to which PNO is subject in connection with the operation of the business or to fulfil various duties of reporting or disclosure under current laws and regulations imposed on PNO.

PNO does not use your personal data to make decisions based solely on automatic processing, including profiling.



PNO endeavours to ensure that all personal data processed by us are accurate and up to date. As a result, we request that you always inform us of any change in your data (e.g. any change of address or payment details) to enable us to ensure that the data are always accurate and up to date.

## **6. Legal basis for the processing of your personal data**

PNO generally processes the data about you on one of the following bases: (1) You have given your consent to the processing of your personal data for one or more specific purposes (Article 6(1)(a) of the GDPR), (2) the conclusion or performance of your agreement with PNO (Article 6(1)(b) of the GDPR), (3) the legitimate interests pursued by PNO, i.e. the purposes described above, (Article 6(1)(f) of the GDPR), and/or (4) compliance with a legal obligation to which PNO is subject (Article 6(1)(c) of the GDPR). Moreover, there may be situations in which we process your personal data for the purposes of the legitimate interests pursued by a third party in connection with the purposes described above, except where such interests are overridden by your interests (Article 6(1)(f) of the GDPR).

## **7. Sharing of personal data**

PNO will disclose data only to the extent necessary as part of the operation of our business.

Furthermore, PNO may disclose your personal data and/or make them available to other suppliers and/or service providers in connection with the general operation of our business, e.g. in connection with the external administration of our IT systems, analysis tasks, marketing tasks, debt collection, credit rating, audit, legal assistance, etc.

PNO endeavours, wherever possible, to restrict the disclosure of personal data in a form enabling them to be attributed to a natural person in order to limit the instances of disclosure of data that could be attributed to you personally.

PNO does not disclose your personal data unless such disclosure is necessary in order to perform our activities or fulfil your needs.

Your personal data may be transferred to countries within as well as outside the European Economic Area (EEA).



When transferring your data to third countries, we have ensured that appropriate security measures have been implemented to protect your personal data and that the transfer of your personal data is in compliance with the requirements and obligations under current data protection law.

## **8. Data integrity and data protection**

Personal data are retained for no longer than is necessary in relation to the purpose for which they were collected, unless retention is necessary to comply with national statutory requirements, including statutory retention periods relating to EU-subsidy control, bookkeeping, etc.

PNO's policy is to protect personal data by taking adequate technical and organisational security measures. Once your personal data are no longer needed, we will ensure that they are erased in a secure manner.

## **9. Your rights**

You are entitled at all times to exercise your rights under the data protection legislation in force at any time. You may for example request access to your personal data in PNO's possession and object to the processing of the data. Furthermore, you may request rectification or erasure of any inaccurate data about you, withdraw a consent to processing of your personal data and exercise your right to data portability.

If you wish to exercise one or more of your rights, please contact us at [info@pnorental.com](mailto:info@pnorental.com). Your request will be processed in accordance with the data protection legislation in force at any time.

Any complaint about the processing by PNO of your personal data should be filed with:

The Danish Data Protection Agency  
Borgergade 28, 5th floor  
DK-1300 Copenhagen K  
Email: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)



## **10. Updates**

PNO will evaluate and update this Privacy Policy from time to time. We would therefore recommend that you regularly check this Privacy Policy for any changes which may be relevant for the processing of your personal data.