

PRIVACY NOTICE

This privacy notice has last been updated on 25 November 2022 .

Introduction

This Privacy Notice is intended for Scania Group customers (and individuals connected with Scania Group customers) who have entered into a financing arrangement (a “**Receivable**”) with the Scania Group, to the extent the Scania Group has transferred its interest in that Receivable to a Relevant SPV (a “**Relevant Transaction**”).

“**Scania Group**” means Scania AB and its affiliates, subsidiaries, and parent companies from time to time.

“**Relevant SPV**” means Griffin Lux S.à.r.l..

This privacy notice applies to all personal information received, processed, or otherwise controlled by Relevant SPVs in connection with a Relevant Transaction. It describes how each Relevant SPV (“**we**”, “**us**”, “**our**”), acting through our Corporate Services Provider Circumference FS (Luxembourg) S.A., collects and processes personal information about you, how we use and protect this information, and your rights in relation to our processing of your information.

Personal information is information, or a combination of pieces of information that could reasonably allow you to be identified.

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What personal information do we collect about you?

The information we may collect about you includes:

- Information establishing your identity (for example, name, address, phone number, date of birth, etc.) and personal background;
- Information related to the financing arrangement (such as financing contract number, vehicle chassis number, vehicle registration number, type of financing contract

(balloon/amortising), balloon amount, last instalment date and amount and principal outstanding balance);

- Information related to your financial behaviour and other transactions you have entered into;
- Other Information you or your organisation have provided to the Scania Group, for example on any application form for other Scania products and services; and
- We also keep record of your IP Address.

How do we obtain your personal information?

We obtain this information from the Scania Group member who provided you or your organisation with the financing arrangement, and (if different) the organisation you or your organisation make repayments to.

We may also obtain information about you from other sources, including from financial institutions, registries, any information you or your organisation provide directly to us, and from other sources.

How do we use your personal information?

We may use or process your information for the following purposes:

- To verify your identity;
- To facilitate or otherwise assist in the provision of any services provided by us to you or your organisation;
- To meet our regulatory and/ or legal and/or financial and/or other reporting obligations;
- To comply with laws, regulations, or court orders in any jurisdiction (whether or not the same is strictly binding or capable of being enforced);
- To prevent or detect fraud, money laundering, terrorist financing or other criminal conduct (including, without limitation, compliance with our internal know your client, anti- money laundering and anti-bribery and corruption policies);
- To recover a debt;
- To assess and manage our operations and financial and insurance risks;
- To maintain the accuracy and integrity of information held by a credit reporting agency and to perfect any security interest granted over an account with us.

On what basis do we use your personal information?

- To comply with legal and regulatory obligations;
- To perform our contractual obligations to you or your organisation;
- For legitimate business purposes, except where our interests are overridden by your interest or fundamental rights and freedom as data subject. Using your personal information helps us to operate and improve our business and minimise any disruption to the services that we may offer to you. When we process personal information to meet our legitimate interests, we inform you about these interests and we put in place robust

safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms;

- Because you have given your consent (if we expressly ask for consent to process your personal information, for a specific purpose); and
- To prevent and detect crime, or for reasons of substantial public interest, and for the establishment, exercise or defence of legal claims or proceedings.

With whom do we share your personal information?

We will only disclose or transfer your information for the purposes set out in this document to:

- Our employees, agents, service providers (such as our auditor or our tax advisor), and shareholders, who are required to maintain the confidentiality of this information;
- Companies and organisations that assist us to process transactions including, but not limited to, stock exchanges and clearing houses;
- Regulatory authorities, police authorities or law enforcement and fraud prevention agencies, where we are compelled or permitted or required to do so by order of a court or governmental or administrative tribunal or by law, regulation or any other legal requirement;
- Any person to whom we may assign or transfer our rights and/or obligations under an agreement with you or any third party as a result of a restructuring, sale or acquisition, provided that the recipient uses the information for the same purpose as it was originally supplied to and/or used by us;
- Such persons as we believe are necessary where a failure to make such disclosure would result in damage to our reputation or good standing, or expose us to civil or criminal prosecution in any jurisdiction; or
- Where failure to make such disclosure would in our opinion be prejudicial to us, our nominees, advisors, or agents; or
- To such other person that we believe in good faith have a right to make a request for disclosure; and
- Any other person where disclosure is made at your request or with your consent (including your advisors or agents), or if otherwise permitted under our agreement with you.

Transfers of your personal information outside of your home country

Your personal information may be transmitted through or stored or processed in jurisdictions outside the EU or UK (as relevant), . Some of these jurisdictions may not be regarded as offering an equivalent level of protection for personal information compared to your country of residency.

We will implement appropriate measures to ensure that your personal information remains adequately protected and secure when it is transferred, in accordance with applicable data protection and privacy laws.

The measures include:

- Entering into EU Standard Contractual Clauses, the UK International Data Transfer Agreement or equivalent contractual protection with the recipient of your information.

Further details of EU Standard Contractual Clauses can be found at <https://ec.europa.eu> (use the site search function to search for “model contracts for the transfer of personal data”). Please contact us for further details;

- Ensuring that the jurisdictions into which your personal information is transferred contain equivalent data protection legislation and requirements to those of the EU.

No automated decision-making

We do currently not make use of automated decision-making, such as profiling, in connection with the processing of your personal information. Should this change at any point in the future, we will inform you accordingly and before such automated decision-making processes will be actively used.

How long will we keep your personal information?

We will only retain the information we gather from you only as long as required to fulfil the purposes outlined above in the section “How we use your personal data” unless a longer period may be required from time to time under relevant laws and regulations, including those relating to taxation, record keeping and prescription periods and unless a longer period is explicitly permitted by relevant laws and regulations, such as where a retention of data is required for the enforcement, exercise or defence of our legal claims. Such information may be retained after your information with us has ended, and for client identification purposes in accordance with our record keeping policy.

Your rights

If you believe that any of your personal information is incorrect or inaccurate, you should notify us so that the information can be updated or corrected, as appropriate.

Subject to laws applicable in your jurisdiction, you may have rights to:

- Access your personal information.
- Object to our use of your personal information.
- Request correction, restriction, portability, or erasure of the information that we process about you.

These rights are subject to any applicable exemptions under the data protection laws.

You may seek to exercise these rights at any time by sending a request by email to enquiries@circumferencefs.com. We will contact you if we need additional information from you in order to honour your requests.

You can withdraw your consent to the processing of your personal information (where we are processing your personal information based on your consent). If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

If you feel that we do not comply with applicable privacy rules you have the right to lodge a complaint with a competent data protection authority.

Contact us

We can be contacted at: enquiries@circumferencefs.com.
