

[Latest update: February 2025]

1. What is the purpose of this information notice?

The purpose of this information notice is to provide you with clear, complete information on how your personal data is processed by D'Ieteren Group SA (hereinafter "D'Ieteren Group" or "we/us").

We process your personal data in accordance with General Data Protection Regulation 2016/679 of 27 April 2016 (hereinafter "GDPR") and the Belgian Law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data (hereinafter "Privacy Law").

To enable you to access the relevant information easily, this information notice is organised into several sections:

- [Who is the data controller? \(2.\)](#)
- [What type of personal data do we process? \(3.\)](#)
- [How and why do we process your personal data? \(4.\)](#) In this section, we give a complete overview of the main processing activities, grouped into two main purposes:
 - To promote the activities of [D'Ieteren Group \(4.1\)](#), and
 - To optimise [the operational efficiency of D'Ieteren Group \(4.2\)](#).
- In the following sections, you can access additional information on specific topics: sharing data with [third parties \(5.\)](#), [the location of your data \(6.\)](#), [the duration of the processing activities \(7.\)](#), [data security \(8.\)](#), a reminder of your [rights and how to exercise them \(9.\)](#), how to contact [D'Ieteren Group about the processing of your personal data \(10.\)](#).

2. Who is the controller?

D'Ieteren Group SA/NV is a listed family investment company focused on growth and value creation in the long term by establishing a group of companies that reinvent their sectors in a bid for excellence and a significant impact.

To carry out its activities, D'Ieteren Group processes your personal data.

"Processing" includes all the operations carried out with the data, such as collection, recording, storage, use and erasure.

D'Ieteren Group is the controller when it determines the purpose and methods of data processing. This information notice informs the persons concerned by this processing. If D'Ieteren Group takes these decisions with other entities, they are jointly responsible, in accordance with the GDPR. The notice will therefore include specific information on these joint controls.

3. What type of personal data do we process?

As part of its activities, D'Ieteren Group interacts with several categories of natural persons (hereinafter "data subjects") (3.1.) and processes specific types of personal data (3.2.).

3.1 Categories of data subjects

D'Ieteren Group processes the personal data of different categories of persons. The table below details the categories concerned by this processing.

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Shareholders	The holders of shares in D'Ieteren Group and their agents and representatives
Internet users	Visitors to D'Ieteren Group's websites and social media pages
Visitors	Persons who visit D'Ieteren Group premises or take part in events organised by D'Ieteren Group.
Person interested in the activities of D'Ieteren Group	This means press and media (in particular journalists), potential investors, analysts, etc.

3.2 Categories of personal data processing

D'Ieteren Group processes different categories of personal data. For greater transparency, here is a non-exhaustive overview of the main categories of data processed. The specific categories mentioned in the information notice refer to the details in the table below. In accordance with the GDPR principle of data minimisation, D'Ieteren Group regularly evaluates the need to process these data according to the stated objectives.

Identification data	Surname, first name, sex, language, date and place of birth, nationality
Contact data	Address, email, telephone, mobile phone, login for an online service, communication network account, contact preferences.
Proof of identity	Extract of data from identity card (surname, first name, address), copy of identity card and/or national number (if required by law).
Professional data	Company, position, VAT number (of company).
Access data	Information collected to enable access to the premises of D'Ieteren Group, the place of an event or any building/installation used for the activities of D'Ieteren Group.
Data related to individual requests	Any information you have provided to D'Ieteren Group (by telephone, email) to ask a question, request a service or a partnership
IT data	IP address, login cookies and other logins.
Internet interaction data	Statistical data related to your interaction with D'Ieteren Group accounts on social media or interactions with D'Ieteren Group websites.
Data related to an event	Information on an event (place, type of activity, list of participants, etc.), depending on the nature of each event.
CCTV images	CCTV images and recordings at the premises of D'Ieteren Group, provided that they are supplied by the building manager, on request from D'Ieteren Group.
Financial and economic data	Bank account number, bank identification, information concerning shares held (number and type of shares).
Data related to voting	Voting instructions (in the event of a proxy or postal vote) and/or voting behaviour.

4. How and why do we process your personal data?

D'leteren Group processes personal data for several purposes, principally to promote the activities of D'leteren Group (4.1), and to optimise our operational efficiency (4.2). You will find more details on these personal data processing activities in the tables and sections below.

In accordance with the GDPR, the following information is detailed below:

- Purpose: describes the purpose for which your data are processed by D'leteren Group;
- Legal basis: describes the legal justification applicable to your data processing, in accordance with Article 6 of the GDPR;
- Categories of data subjects: states what type(s) of natural persons the data processed by D'leteren Group belongs to (more details on the categories are given at point 3.1.).
- Data categories: describes the types of personal data processed by D'leteren Group. Generic names are used for the purposes of clarity (more details on the categories are given at point 3.2.); the personal data categories are not intended to be exhaustive;
- Joint controllers: specific processing activities are carried out in collaboration with other data managers, who decide the purposes and processing methods with D'leteren Group. In accordance with Article 26 of the GDPR, additional specific information is provided where necessary.

4.1 To promote the activities of D'leteren Group

D'leteren Group processes your data with your prior authorisation in order to send you communications and invitations to events.

The consent that you give us to process your data can be withdrawn at any time, for example via the unsubscribe links at the bottom of emails.

a. To present the activities of D'leteren Group on the websites

You can visit our websites and find out about our activities without having to provide personal information to us. However, the use of certain cookies is needed to navigate our websites. For more information on this topic, please refer to the cookies policy on the website that you visit.

b. To invite you to events organised by D'leteren Group

Purpose	To send you invitations and welcome participants to events organised by D'leteren Group and its partners
Legal basis	Processing is based on your consent (Article 6, paragraph 1, point a) of the GDPR).
Categories of data subjects	Shareholders, persons interested in the activities of D'leteren Group
Data categories	Identification data, contact data
Joint controllers	Specific events can be organised jointly with partners of D'leteren Group. Where applicable, additional specific information is provided in the information notice on the websites for the event in question.

c. To send you our newsletter, press releases or annual reports

Purpose	To send you our communications related to the development, activities or investments of D'leteren Group
Legal basis	Processing is based on your consent (Article 6, paragraph 1, point a) of the GDPR).
Categories of data subjects	Internet users, persons interested in the activities of D'leteren Group, shareholders
Data categories	Identification data, contact data

d. To inform you about D'leteren Group activities and news via online platforms

D'leteren Group manages its presence on the Internet and social media to inform the public of its activities and news, through dedicated pages. In doing so, documents related to the processing of personal data via pre-existing platforms (Facebook, Instagram, X (formerly Twitter), LinkedIn) apply.

D'leteren Group has no influence on the documents made or the data processing done by these platforms, particularly with regard to the processing carried out to improve their advertising system and to collect audience statistics on pages visited.

However, it is possible that we are viewed as joint controllers with these platforms. In this case, the data you send us when you visit our pages on these platforms are or can be processed jointly by the social network and D'leteren Group (as an administrator of its pages on the social network) for the following purposes:

- the collection of certain data via cookies;
- improvement by the social network of its advertising system;
- to obtain audience statistics for the page.

These data are only processed by the administrator of the page (D'leteren Group) within the framework of its legitimate interest to inform the public about its activities and obtain statistics to promote its pages adequately on the social networks (Article 6.1.f of the GDPR). The audience statistics collected by the social networks are only sent to D'leteren Group in its capacity as an administrator of the page and in anonymised format.

The personal data concerned can be data related to your account, data related to sharing of content or your communications with other persons using the same platform.

These personal data are or can be processed for as long as the page exists and you visit it.

The privacy notice for each social network used by D'leteren Group can be viewed by clicking on the following links:

1. [Facebook](#) & [Instagram \(Meta\)](#)
2. [X \(Twitter\)](#),
3. [LinkedIn](#),

4.2 To optimise our operational efficiency

a. To manage our shareholders

Purpose	To identify the owners of D'leteren Group shares and communicate with these shareholders, their registration/deregistration in our shareholder register, to give them access to any information concerning the company's activity and, generally, to exercise their rights, manage their participation at the D'leteren Group General Meeting and pay dividends and other disbursements to shareholders. The data are also processed for the purposes of due diligence.
Legal basis	Processing is necessary to enable D'leteren Group to comply with its legal obligations (Article 6.1.c of the GDPR), specifically those contained in the Companies and Associations Code, accounting obligations, and obligations concerning anti-money laundering measures. Processing is necessary for the legitimate interests of D'leteren Group to monitor and manage our shareholders (Article 6.1.f of the GDPR).
Categories of data subjects	Shareholders

Data categories	Identification data, contact data, financial and economic data, professional data.
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b. To comply with legal obligations

Purpose	To comply with legal obligations, in particular obligations incumbent on companies listed on the stock exchange, related to data protection, accounting, taxation and to prevent fraud of these legal obligations by third parties.
Legal basis	Processing is necessary to ensure that D'leteren Group complies with its legal obligations (Article 6.1.c of the GDPR). Processing is also necessary for the legitimate interests of D'leteren Group to secure its data and its assets, and the legitimate interest of D'leteren Group personnel, suppliers' personnel, partners' personnel and the general public to prevent fraud or evasion of legal obligations (Article 6.1.f of the GDPR).
Categories of data subjects	Any person whose personal data are processed by D'leteren Group, regardless of their status (shareholders, Internet users, visitors, etc.)
Data categories	Identification data, proof of identity, contact data, data related to individual requests, contractual data, financial data, IT data, data related to activities (insofar as is necessary to comply with the applicable legal obligations and retain proof of compliance, in the event of dispute or suspicion of fraud).

c. To secure the premises, property, tools and events of D'leteren Group

Purpose	To ensure the security of our premises, our infrastructure, our IT tools and infrastructure, our offices or more generally our buildings and/or events (including fraud prevention).
Legal basis	Processing is necessary for the legitimate interests of D'leteren Group to secure its premises, tools and assets, and for the legitimate interest of D'leteren Group personnel, suppliers' personnel and visitors/customers/prospective customers to be safe when they are on D'leteren Group premises or when they use D'leteren Group tools (Article 6.1.f of the GDPR). Where applicable, the use of cameras is indicated by the regulatory pictogram displayed in the premises concerned.
Categories of data subjects	Visitors, customers, shareholders, media and press
Data categories	Identification data, proof of identity, professional data, access data, IT data, CCTV images (provided that these are supplied by the building manager on request).

d. To protect our interests and manage disputes

Purpose	To detect and prevent fraud and illegal activities that might compromise the good functioning and security of our activities, websites or applications. This also includes protecting the interests of D'Ieteren Group in the event of a dispute.
Legal basis	Processing is necessary for the legitimate interests of D'Ieteren Group, namely to maintain the financial and technical balance and conserve all necessary means to protect its interests in the event of a dispute/legal proceeding (Article 6.1.f of the GDPR).
Categories of data subjects	Any person in dispute with us, regardless of their status (shareholders, Internet users, visitors, etc.)
Data categories	All personal data necessary to protect the interests of D'Ieteren Group and to provide proof in the event of a claim (identification data, proof of identity, individually requested data, IT data, etc.).

5. Who do we share your data with?

When this is necessary to achieve the stated objectives, D'Ieteren Group can work with third parties to process your personal data. Depending on the nature of the processing activity concerned, your personal data can be shared with one or more categories of recipients identified below.

a. Subsidiaries of D'Ieteren Group

We can share your personal data with our subsidiaries (including D'Ieteren Automotive).

In this context, D'Ieteren Group shares only strictly necessary data with its subsidiaries, depending on the type of objective.

b. Subcontractors of D'Ieteren Group

To perform its activities, D'Ieteren Group works with external suppliers to benefit from their specific expertise. More precisely, your data can be processed by the following categories of external suppliers, acting on instruction and under the responsibility of D'Ieteren Group:

- IT service providers (hosting, accounting solutions, online platforms, electronic messaging, etc.);
- Consultants responsible for producing specific studies;
- Suppliers of management, security and guarding services (on site and remotely);
- Our subsidiaries, as necessary to meet specific objectives (such as within our service agreements);
- various insurance policies.

These service providers process the data exclusively for the purposes authorised by D'Ieteren Group and in accordance with the instructions of D'Ieteren Group, therefore acting as subcontractors. To ensure optimum protection of personal data, we have taken the necessary contractual measures with the aforementioned subcontractors to guarantee their compliance with

the strictest standards of protection of privacy. In all cases, the subcontractors are required to guarantee the security and confidentiality of personal data. The above list is not exhaustive, as specific subcontractors can be used, depending on the nature of the processing activities.

c. Public authorities

In certain cases and in particular in the event of legal obligations, D'Ieteren Group can need to share your data with the public authorities or entities with a public interest mission, such as: the tax authorities (for D'Ieteren Group's accounting control or VAT declaration, for example), the Financial Services and Markets Authority (FSMA), the authorities that apply the law, the data protection authorities, etc.

d. Partners of D'Ieteren Group

Your data can be shared with D'Ieteren Group's business partners, where relevant. These partners, who are distinct controllers, must guarantee the confidentiality and protection of your data. Depending on the activity, these partners can include auditors, external experts, accountants, insurance companies, legal bailiffs and lawyers.

6. Where are your data kept?

Your data are mainly stored on servers in the European Economic Area.

In certain circumstances, your data can be transferred to a country outside the European Economic Area. In this case, the recipients are either located in a country for which the European Commission has taken an adequacy decision or are required to comply with the same data protection standards as those applicable in the European Union, by means of standard contractual clauses such as those published by the European Commission, with additional security measures where applicable.

7. How long do we keep your data?

Your data is kept for as long as necessary for the processing required by the purpose for which they have been collected.

More specifically:

- To secure the premises, property, tools and events of D'Ieteren Group: 1 year after your visit or access, 30 calendar days after your visit for CCTV recordings and images (provided that these are supplied by the building manager).
- To protect our interests and manage disputes for a period of time equivalent to the limitation period applicable to the legal proceedings in question. In the event of a dispute, the data are kept until the end of the dispute and the exhaustion of all appeals.

If D'Ieteren Group is bound by specific legal obligations, these periods of time can be extended to guarantee that the processing complies with the applicable legal regulations.

8. How do we protect your data?

At D'Ieteren Group, we are committed to protecting the confidentiality and security of your personal data. Our data protection practices comply with the strictest standards in the industry and we adhere to standard ISO/IEC 27001:2013 to guarantee the confidentiality, integrity and availability of your data. Standard ISO/IEC 27001 is an internationally recognised framework for managing information security. This standard reflects our commitment to maintain robust checks and processes on information security.

D'Ieteren Group ensures the security and confidentiality of your data by implementing state-of-the-art measures. You can be assured that your data are processed with the greatest care and protected against unauthorised access, disclosure, alteration and destruction. We continuously evaluate and improve our security measures to adapt to developments in threats and technology.

9. What are your rights and how can you exercise them?

Within the limits set out by the GDPR, you can exercise the following rights regarding your personal data processed by D'Ieteren Group:

- Access and rectification - You have the right to request access to your data and to rectify them if necessary.
- Objection - You can object to the processing of your data that we perform on the basis of legitimate interest. You can object to the use of your personal data at any time, by using the different contact points listed in section 10 "How to contact us".
- Withdrawal of consent - When the data are processed on the basis of your consent, you can withdraw this consent at any time, without calling into question any processing carried out previously.
- Portability - The data we have provided can be communicated to you or transmitted to third parties in electronic form.
- Erasure - You can obtain erasure of your data or limitation of processing if they are no longer relevant for the purposes of the processing.

You can exercise the first five rights by contacting us via the contact data listed in the following section "How to contact us".

Right to lodge a complaint with the Belgian Data Protection Authority - If you think that D'Ieteren Group is not respecting your rights, you can lodge a complaint with the Belgian Data Protection Authority at the following address: Data Protection Authority, Rue de la Presse/Drukpersstraat 35, 1000 Brussels - contact@apd-gba.be.

10. How to contact us

To ensure that the way in which we process your data complies with the applicable legislation, D'Ieteren Group works closely with a dedicated team of specialist corporate lawyers in the D'Ieteren Automotive Privacy Office.

For any questions concerning the processing of your personal data, you can contact the Privacy Office in the following ways:

- By email: privacyoffice@dieteren.be
- By post: D'Ieteren Group (Legal Department) - Rue du Mail/Maliestraat 50, 1050 Brussels

11. Modifications to this information notice

D'Ieteren Group can modify this information notice at any time. To keep you informed of the latest modifications to this information notice, we will update the revision date accordingly.

The information notice is available (and can be downloaded in PDF format) in several languages, the content of the French version prevailing in the event of any inconsistency.