

Customer Privacy Notice

The protection of your personal data is of great importance to the GATX Rail Europe group and in particular, the GATX Rail Europe entity you are in contact with (“**we**”). We would, therefore, like to inform you how we process your personal data and, if applicable, how we disclose and use such data as well as how you can exercise your rights as a data subject.

1. Purposes for which we process your data

We will process the categories of your personal data set out in Point 2 for the following purposes:

- performing direct marketing via electronic and non-electronic means as well as advertising;
- analysis of customer satisfaction;
- managing of our relationships with (potential) customers, including the analysis of (potential) customers’ business needs and how they use our products and services;
- business analytics and statistical analysis, including the aggregation of data in order to analyze market trends and anticipate (potential) customer demand;
- documenting interactions (e.g. meetings, phone calls, e-mail conversations) with (potential) customers;
- organization of and invitation to any of our events;
- business opportunity management and tracking of opportunities;
- managing and performing sales processes, compliance with sanctions (e.g. trade sanctions) and other regulatory requirements;
- making available certain online services to customers and further optimizing and developing such services and analyzing the usage of such services and generating access statistics;
- analyzing and forecasting (potential) customer demand; and
- administration of any on-site visits at our premises, including ensuring the health and safety of our employees and visitors.

We collect your personal data either

- from you directly, in the course of our communication or business relationship; or
- from public sources (e.g. public internet sources, public registers, public attendance lists of events); or
- through our employees, who are in contact with you or manage the relationship with you.

You are under no obligation to provide us with the data we ask you for. However, if you do not provide your personal data certain business processes or marketing processes might be delayed or even impossible, and it might become impossible for you to attend our events. Should the provision of your personal data be mandatory by law, we will inform you separately thereof.

2. Personal data we collect and process

We collect and process the following personal data relating to you:

- **Main data:** name, academic title, salutation/sex, language, country, birth date, associated (potential) customer (employer), company address, e-mail address, phone number, fax, and other contact, information, roles/functions at (potential) customer, department, and any other data necessary to communicate with you efficiently.
- **Relationship data:** professional and personal interests, career information, meeting notes, receipt of and reaction to marketing and sales initiatives, information on participation in prize draws and sweepstakes (e.g. prize awarded), history of previous interactions with any of our group companies, information on the use of any online services provided by any of our group companies, including IP address, authentication data (e.g., username and password), URLs visited, time and date of the use of an online service or a particular feature thereof, name and version of the client software used, location data, and the webpage (URL) visited before accessing the online service, history of orders placed, history of inquiries made, customer category, correspondence, additional information necessary to ensure the health and safety of our customers and visitors, and any other information to document and maintain our relationship with you.
- **Commercial information:** scope of power of attorney for the (potential) customer, history of commercial transactions with any of our group companies, contracts entered into on behalf of the customer, contractual documentation, information about contract performance and instances of non-performance, information about the expiration and termination of the contract, and other information necessary to document our commercial relationship with your employer.

3. Legal bases of the processing

We process the categories of your personal data listed in Point 2 either on the basis of

- your consent according to Article 6(1)(a) of the General Data Protection Regulation (“**GDPR**”), for which we may ask you in a separate process;
- our prevailing legitimate interest according to Article 6(1)(f) GDPR to achieve the purposes set out in point 1; or
- the necessity to comply with legal obligations to which we are subject (Article 6(1)(c) GDPR).

4. Transfer of your personal data

To achieve the purposes set out above, we may transfer your personal data to the following categories of recipients:

- IT service providers that we use;
- auditors for the performance of audits;
- contract partners or business partners who are or should be participating in the performance of the delivery or service;
- companies that are part of the GATX Corporation corporate group (www.gatx.com);
- banks for the management of payment transactions;
- courts and public authorities; and
- insurances in the context of the conclusion of an insurance contract concerning the delivery/service or occurrence of the insured event.

Some of the recipients referred to above are located in or process personal data outside of your country. The level of data protection in another country may not be equivalent to that in your country. However, we only transfer your personal data to countries where the EU Commission has decided that they have an adequate level of data protection or we take measures to ensure that all recipients provide an adequate level of data protection. We do this for example by entering into appropriate data transfer agreements based on Standard Contractual Clauses (2010/87/EC and/or 2004/915/EC). These are accessible upon request (see the contact details in point 7).

5. Retention period

We will retain your personal data for (i) as long as we are in a business relationship with you and thereafter (ii) as long as required under statutory retention obligations or (iii) as long as potential legal claims, where personal data is needed to raise or defend against the claim, are not yet time-barred.

6. Your rights in connection with your personal data

Under applicable law, you have the right to (under the conditions set out in applicable law):

- obtain confirmation as to whether and what kind of personal data we store about you and to request copies of such data;
- request us to restrict the processing of your personal data;
- request data portability;
- request rectification or erasure of your personal data;
- object to the processing of your personal data; and
- lodge a complaint with the competent supervisory authority.

7. Our contact details

Please address your requests and any other questions concerning this notice to your contact person at GATX or GDPR@gatx.eu. Furthermore, you can find the contact details of each entity [here](#).

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