## **Privacy statement ILSA**

ILSA is an Intelligent Listing Site API, that is used to power vehicle inventory search and displaying vehicle inventory data in websites and/or applications (hereafter APPLICATION). ILSA collects various data for these activities, including personal data. It is paramount that ILSA values privacy and therefore treats your personal data confidentially and carefully. Personal data is processed in accordance with the General Data Protection Regulation (GDPR) and other applicable privacy and data protection legislation following the processor agreement of APPLICATION.

## **Processing personal data**

## What personal data does ILSA process?

For every request on the search API on APPLICATION, ILSA may process the following (personal) data:

- IP address;
- User agent;
- Referrer and origin (which website the request was sent from);
- ILSA Instance ID
- The content of the request and response (i.e. what was searched for, which vehicle was viewed, the lead information).

## For what purpose does ILSA process your (personal) data?

Your (personal) data may be processed for the following purposes:

- To generate better search results;
- Statistical information;
- To make our service work more efficient.

Your (personal) data may also be processed when justified:

- In the interests of State security;
- For the prevention, detection and prosecution of criminal offences;
- For important economic and financial interests of the State and other public bodies;
- For the protection of the rights and freedoms of others; and;
- For the supervision of compliance with statutory regulations established for the purpose of investigation and prosecution of criminal offences or for important economic and financial interests of the State and other public bodies.

#### What is the basis for processing your (personal) data?

If a request is being sent to ILSA, ILSA will process your personal data to give effect to the agreement between ILSA and APPLICATION.

To the extent that data is processed outside that agreement that is not necessary for the execution of the agreement between ILSA and APPLICATION, ILSA has a legitimate interest in processing your personal data. Think of safeguarding security, preventing fraud or direct marketing interests. However, ILSA will make a proper balancing of interests in each situation between safeguarding your privacy on the one hand and the legitimate interest of ILSA on the other. Only if the legitimate interest of ILSA outweighs your freedom and privacy rights, your (personal) data be processed on that basis.

#### **Cookies**

ILSA does not use any cookies.

### **Retention period**

Your personal data will not be kept for longer than is necessary for the purpose for which ILSA collects or processes the data or is required under laws and regulations, with a maximum of 60 days. Non personal data is not subject to the forementioned retention period.

# Recipients of your data

Your (personal) data may be provided by us to the following categories of recipients:

- Those charged with or necessarily involved in the execution of the agreement between ILSA and APPLICATION;
- Others, if the data processing is necessary for the fulfilment of a legal duty by ILSA;
- Others, if the data is processed (exclusively) for statistical or historical purposes.

A processing agreement is concluded with third parties who process your personal data on behalf of and at the instruction of ILSA, as a result of which those third parties are also obliged to comply with privacy legislation. Third parties engaged by ILSA, which offer services as processors, are themselves responsible for compliance with privacy legislation for the (further) processing of your personal data.

## **Transfer to other countries**

Your (personal) data can be processed from and to countries outside the EU or EEA. Personal data will not be stored outside the EU or EEA, only processed. Non personal data can in certain cases be stored outside the UE or FFA.