

WEX PRIVACY NOTICE

WEX Fleet Europe (collectively referred to as "**WEX**", "we", "us") is part of a group of companies who may process personal data of individuals. The Group consists of companies set out below. WEX takes its data protection and privacy responsibilities seriously. This privacy notice explains how we collect, use and share personal information in the course of our business activities, including:

- [What personal information we collect and when and why we use it.](#)
- [How we share personal information within WEX, including sharing with other WEX entities located outside of the EU, and with our service providers, regulators and other third parties](#)
- [Explaining more about Direct Marketing, Profiling, and Automated Decision Making](#)
- [Transferring personal information globally](#)
- [How we protect and store personal information](#)
- [Legal rights available to help manage your privacy](#)
- [How you can contact us for more support](#)

The WEX entity responsible for your personal information will be the member of WEX that originally collects information from or about you. This will be explained at the point at which your personal information is first collected by that WEX entity, for example where you or the business you work for engages us to provide a service or where we engage you to provide a service to us.

You can find out more about WEX at www.wexinc.com or by contacting us using the information in the [Contact us](#) section.

We may amend this notice from time to time to keep it up to date with legal requirements and the way we operate our business. Please regularly check these pages for the latest version of this notice. If we make significant changes to this privacy notice, we will seek to inform you by notice on our website or email.

You might find external links to third party websites on our website. This privacy notice does not apply to your use of a third party site

WHAT PERSONAL INFORMATION WE COLLECT AND WHEN AND WHY WE USE IT

In this section you can find out more about

- the types of personal information we collect
- when we collect personal information
- how we use personal information
- the legal basis for using personal information

Whose information do we collect

We collect information about you if you:

- [use one of our website\(s\) or online services](#);
- [purchase or receive one of our services](#);
- [you are identified as a potential customer](#); or
- [work with us as a business partner](#)

collectively ("**you**").

When you use our websites or online services

On our website, personal information (such as your name, address, telephone number, or email address) is collected when you voluntarily submit it through a website form, such as during a request for information about our services. Other information that may also constitute personal information (such as your browser type, operating system, IP address, domain name, number of times you visited the website, dates you visited the website, and the amount of time you spent viewing the website) may be collected via cookies and other tracking technologies (such as transparent GIF files). Aggregate Information (such as how many times visitors log onto the website) may also be collected.

We will use this information in the following ways and where we are satisfied that we have an appropriate legal basis to do so:-

How we use your information	What is the legal basis for our use of your information
To monitor your use of our websites in order to make improvements to the site and the user experience.	Our use of your personal information is in our legitimate interest as a commercial organisation.
To respond to queries you raise through the website.	Our use of your personal information is in our legitimate interest as a commercial organisation.
For providing targeted advertising based on the information collected through your use of the website	Our use of your personal information is in our legitimate interest as a commercial organisation.
To market to you about our products and services, and otherwise to identify goods and services which we believe may be of interest to you.	Our use of your personal information is in our legitimate interest as a commercial organisation.

When you purchase one of our products or services

Where you purchase or receive our services, we may collect:

- basic identification and contact information (such as your name, address, telephone number, gender, national ID number or driving licence information and email address) in order to fulfil your order, provide our services and manage your account;
- demographic information such as your age and information about your occupation;
- financial information (such as bank account information, tax registration information, billing and details) in order to manage and process payments you make to us;
- information held by credit references agencies and fraud prevention agencies, in order to assess your application for the use of our services; and
- information about your use of our products and services and your satisfaction with them, in order to continuously improve the products and services that we provide to you.

We will use this information in the following ways and where we are satisfied that we have an appropriate legal basis to do so:-

How we use your information	What is the legal basis for our use of your information
Setting up and ongoing management of your account with us.	Our use of your personal information is necessary to perform a contract with you. It is also necessary to use your personal information in our legitimate interest as a commercial organisation.
For credit control purposes and to analyse payments made against your account.	Our use of your personal information is necessary to perform a contract with you. It is also necessary to use your personal information in our legitimate interest as a commercial organisation.
For credit vetting purposes, to assess your application to receive our services.	Our use of your personal information is in our legitimate interest as a commercial organisation.
To provide general customer services and to respond to your queries and complaints in relation to our services.	Our use of your personal information is necessary to perform a contract with you. It is also necessary to use your personal information in our legitimate interest as a commercial organisation.
To deliver our goods and services to you as you request.	Our use of your personal information is necessary to perform a contract with you.

<p>To evaluate your use of our products and services in order to assist with our development of new products and services, and to make improvements to our existing products and services.</p>	<p>Our use of your personal information is in our legitimate interest as a commercial organisation.</p>
<p>For our internal budgeting purposes, maintain financial records, undertake internal financial reporting and make payments to contractors and other third parties</p>	<p>Our use of your personal information is in our legitimate interest as a commercial organisation.</p>
<p>For fraud prevention purposes and to monitor our customers' use of our services into to detect fraud.</p>	<p>Our use of your personal information is in our legitimate interest as a commercial organisation.</p>
<p>To monitor, maintain and improve our IT environment and the applications that our customers use and that we use to manage our services.</p>	<p>Our use of your personal information is in our legitimate interest as a commercial organisation.</p>
<p>To maintain your access to our network and applications.</p>	<p>Our use of your personal information is necessary to perform a contract with you.</p> <p>It is also necessary to use your personal information in our legitimate interest as a commercial organisation.</p>
<p>To market to you about our products and services, and otherwise to identify goods and services which we believe may be of interest to you.</p>	<p>Our use of your personal information is in our legitimate interest as a commercial organisation.</p>
<p>Conducting focus groups and undertaking customer relationship management activities and customer satisfaction surveys in order to make improvements to our products and services.</p>	<p>Our use of your personal information is in our legitimate interest as a commercial organisation.</p>
<p>For our employee training purposes.</p>	<p>Our use of your personal information is in our legitimate interest as a commercial organisation.</p>
<p>In order to enable us to comply with any legal or regulatory requirements.</p>	<p>Our use of your personal information is necessary to comply with a relevant legal or regulatory obligation that we have.</p>

When You are identified as a potential customer

We collect information directly, from other members of the WEX group, and from other third party lead providers about organisations who feel might like to hear from us or receive our products and services. In those circumstances, we may collect basic identification and contact information (such as your name, address, telephone number, and email address) in order to fulfil your order, provide our services and manage your account in order to market our goods and services to you. We will only do so in accordance with your preferences and as described in this privacy notice.

Specifically we may collect:

- basic identification and contact information (such as your name, address, telephone number, gender, national ID number and email address) in order to fulfil any order, provide our services and manage your account;
- demographic information such as your age and information about your occupation;
- financial information (such as bank account information, tax registration information, billing and details) in order to manage and process any payments you make to us;
- information held by credit references agencies and fraud prevention agencies, in order to assess any application for your use of our services; and
- information and feedback you provide to us about our products and services in order to continuously improve the products and services that we provide to you.

We will use this information in the following ways and where we are satisfied that we have an appropriate legal basis to do so:-

How we use your information	What is the legal basis for our use of your information
For credit vetting purposes, to assess your application to receive our services.	Our use of your personal information is in our legitimate interest as a commercial organisation.
To provide general customer services and to respond to your queries and complaints in relation to our services.	Our use of your personal information is necessary to perform a contract with you. It is also necessary to use your personal information in our legitimate interest as a commercial organisation.
To evaluate your use of our products and services in order to assist with our development of new products and services, and to make improvements to our existing products and services.	Our use of your personal information is in our legitimate interest as a commercial organisation.
For our internal budgeting purposes, maintain financial records, undertake internal financial reporting and make payments to contractors and	Our use of your personal information is in our legitimate interest as a commercial organisation.

other third parties	
For fraud prevention purposes and to monitor our customers' use of our services into to detect fraud.	Our use of your personal information is in our legitimate interest as a commercial organisation.
To monitor, maintain and improve our IT environment and the applications that our customers use and that we use to manage our services.	Our use of your personal information is in our legitimate interest as a commercial organisation.
To maintain your access to our network and applications.	Our use of your personal information is necessary to perform a contract with you. It is also necessary to use your personal information in our legitimate interest as a commercial organisation.
To market to you about our products and services, and otherwise to identify goods and services which we believe may be of interest to you.	Our use of your personal information is in our legitimate interest as a commercial organisation.
Conducting focus groups and undertaking customer relationship management activities and customer satisfaction surveys in order to make improvements to our products and services.	Our use of your personal information is in our legitimate interest as a commercial organisation.
For our employee training purposes.	Our use of your personal information is in our legitimate interest as a commercial organisation.
In order to enable us to comply with any legal or regulatory requirements.	Our use of your personal information is necessary to comply with a relevant legal or regulatory obligation that we have.

When you work with us as a business partner

Where you are engaged by us to provide goods or services to WEX, we may collect:

- basic identification and contact information (such as your name, address, telephone number, and email address) in order to fulfil our contract with you and receive your services;
- demographic information such as your age and information about your occupation;
- financial information (such as bank account information, tax registration information, billing and details) in order to manage and process payments we make to you;
- information held by credit references agencies and fraud prevention agencies, in order to assess your relationship with us.

We will use this information in the following ways and where we are satisfied that we have an appropriate legal basis to do so:-

How we use your information	What is the legal basis for our use of your information
To evaluate our customers' use of our products and services you provide in order to assist with our development of new products and services, and to make improvements to our existing products and services.	Our use of your personal information is in our legitimate interest as a commercial organisation.
For our internal budgeting purposes, maintain financial records, undertake internal financial reporting and make payments to you and other third parties	Our use of your personal information is necessary to perform a contract with you. It is also necessary to use your personal information in our legitimate interest as a commercial organisation.
For credit control purposes and to analyse payments made against your account.	Our use of your personal information is necessary to perform a contract with you. It is also necessary to use your personal information in our legitimate interest as a commercial organisation.
To monitor, maintain and improve our IT environment and the applications that our customers use and that we use to manage our services.	Our use of your personal information is in our legitimate interest as a commercial organisation.
To market to you about our products and services, and otherwise to identify goods and services which we believe may be of interest to you.	Our use of your personal information is in our legitimate interest as a commercial organisation.
Conducting focus groups and undertaking	Our use of your personal information is in our

customer relationship management activities and customer satisfaction surveys in order to make improvements to our products and services.	legitimate interest as a commercial organisation.
For our employee training purposes.	Our use of your personal information is in our legitimate interest as a commercial organisation.
In order to enable us to comply with any legal or regulatory requirements.	Our use of your personal information is necessary to comply with a relevant legal or regulatory obligation that we have.

SHARING PERSONAL INFORMATION WITHIN WEX, WITH OUR SERVICE PROVIDERS, OUR REGULATORS

In this section you can find out more about how we share personal information:

- within WEX
- with third parties that help us provide our products and services; and
- our regulators.

We share your information in the manner and for the purposes described below:

- i. within the WEX group, where such disclosure is necessary to provide you with our services or to manage our business;
- ii. with third parties who help manage our business and deliver services. These third parties have agreed to confidentiality restrictions and use any personal information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us. These include IT service providers who help manage our IT and back office systems and marketing agencies who help us communicate with you about our products or services;
- iii. to our professional services providers, such as accountants and law firms;
- iv. with credit reference agencies and organisations working to prevent fraud in financial services;
- v. with our regulators to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies;
- vi. we may share in aggregate, statistical form, non-personal information regarding the visitors to our website, traffic patterns, and website usage with our business partners, affiliates or advertisers;
- vii. If, in the future, we sell or transfer some or all of our business or assets to a third party, we may disclose information to a potential or actual third party purchaser of our business or assets.

EXPLAINING MORE ABOUT DIRECT MARKETING, PROFILING AND AUTOMATED DECISION MAKING

In this section you can find out more about

- how we use personal information to keep you up to date with our products and services.
- how you can manage your marketing preferences
- when and how we undertake profiling and analytics

How we use personal information to keep you up to date with our products and services

We may use personal information to let you know about WEX products and services that we believe will be of interest to you. We may contact you by email, post, or telephone or through other communication channels that we think you may find helpful. In all cases, we will respect your preferences for how you would like us to manage marketing activity with you.

How you can manage your marketing preferences

To protect privacy rights and to ensure you have control over how we manage marketing with you:

- we will take steps to limit direct marketing to a reasonable and proportionate level and only send you communications which we believe may be of interest or relevance to you;
- you can ask us to stop direct marketing at any time - you can ask us to stop sending email marketing, by following the 'unsubscribe' link you will find on all the email marketing messages we send you. Alternatively you can contact us at privacy@wexinc.com. Please specify whether you would like us to stop all forms of marketing or just a particular type (e.g., email); and
- you can change the way your browser manages cookies, which may be used to deliver online advertising, by following the settings on your browser as explained below.

When and how we undertake profiling and analytics

Please refer to our cookie policy to find out more about the information we collect using cookies and tracking technologies.

TRANSFERRING PERSONAL INFORMATION GLOBALLY

In this section you can find out more about:

- how we operate as a global business and transfer data internationally.
- the arrangements we have in place to protect your personal information if we transfer it overseas.

WEX operates on a global basis. Accordingly, your personal information may be transferred and stored in countries outside the EU, including the United States of America, that are subject to different standards of data protection. WEX will take appropriate steps ensure that transfers of personal information are in accordance with applicable law and carefully managed to protect your privacy rights and interests and transfers are limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangement are in place to protect your privacy rights. To this end:

- we ensure transfers within WEX will be covered by an agreement entered into by members of WEX (an intra-group agreement) which contractually obliges each member to ensure that personal information receives an adequate and consistent level of protection wherever it is transferred within WEX;
- where we transfer your personal information outside WEX or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your personal information. Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of personal information transferred from within the EU to the United States; or
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information are disclosed.

You have a right to [contact us](#) for more information about the safeguards we have put in place (including a copy of relevant contractual commitments) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

HOW WE PROTECT AND STORE YOUR INFORMATION

Security

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to reduce the risk of accidental destruction or loss, or the unauthorised disclosure or access to such information appropriate to the nature of the information concerned. Measures we take include placing confidentiality requirements on our staff members and service providers; destroying or permanently anonymising personal information if it is no longer needed for the purposes for which it was collected, or encrypting personal information at rest where systems permit.

Storing your personal information

We will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this notice. In some circumstances we may store your personal information for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, accounting requirements.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

LEGAL RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information. Click on the links below to learn more about each right you may have:

- [To access personal information](#)
- [To rectify / erase personal information](#)
- [To restrict the processing of your personal information](#)
- [To transfer your personal information](#)
- [To object to the processing of personal information](#)
- [To object to how we use your personal information for direct marketing purposes](#)
- [To obtain a copy of personal information safeguards used for transfers outside your jurisdiction](#)
- [To lodge a complaint with your local supervisory authority](#)

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by [contacting us](#). Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Right to access personal information

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of; (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities to whom your personal information may be transferred.

Right to rectify or erase personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see [right to object](#)); or
- it has been processed unlawfully; or
- to comply with a legal obligation to which WEX is subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims;

Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

Right to object to the processing of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

Right to object to how we use your personal information for direct marketing purposes

You can request that we change the manner in which we contact you for marketing purposes.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your [local supervisory authority](#) if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us using the contact details below. We will investigate and attempt to resolve complaints and disputes and will make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by data protection laws.

privacy@wexinc.com

The contact details of each of WEX's data controllers and, where applicable their representatives and relevant data protection contact, are:

Name of the Legal Entity	Company #	Address	Email address
WEX Fleet Belgium BVBA	0725.741.231	Avenue Louise 2019A 1050 Brussels Belgium	privacy@wexinc.com
WEX Fleet France SAS	850 896 796	102 avenue des Champs-Elysees 75008 Paris France	privacy@wexinc.com
WEX Inc.		97 Darling Avenue South Portland Maine 04106	privacy@wexinc.com
WEX Fleet Luxembourg S.à r.l.,	B234548	19 rue de Bitbourg Luxembourg 1273	privacy@wexinc.com
WEX Fleet Netherlands B.V.	859973591	Schiphol Boulevard 359 1118 BJ Schiphol The Netherlands	privacy@wexinc.com
WEX Fleet US LLC	7386268	97 Darling Avenue South Portland Maine 04106	privacy@wexinc.com