DATA PROTECTION NOTICE

Last updated [September 2026]

As a trusted companion, the protection of your personal data is important to the BNP Paribas Group (the "Group").
We have revised our Data Protection Notice to improve transparency and provide further information on our processing of your personal data, including but not limited to personal data processing in the context of credit risk management;

Introduction

We take the protection of your personal data very seriously; accordingly, the Group has adopted strong data protection principles in its Personal Data Protection Charter available at BNP Paribas - Personal Data Privacy Charter (group.bnpparibas).

CNH Industrial Capital Europe SAS S.A. Spółka Uproszczona ("we" "our"), with it registered office in Warsaw (00-844) at Grzybowska 78, as a controller, is responsible for collecting and processing your personal data in relation to our activities.

Our job is to help all our clients – the liberal professions, entrepreneurs, TPE (Very Small Enterprises), SMEs (Small and Medium Enterprises), large enterprises – in their day-to-day activities by financing their investments, developing their sales of professional equipment or financing their stock, and outsourcing management.

As a member of an integrated banking and insurance group, in collaboration with the various entities of the Group, we provide our customers with a complete range of banking, insurance and leasing products and services.

The purpose of this Data Protection Notice is to inform you of the personal data we collect about you; the reasons why we use and share such data; how long we keep the data; what your rights are (as to the control and management of your data) and how you can exercise your personal data rights.

1. ARE YOU SUBJECT TO THIS NOTICE?

This Data Protection Notice applies to you ("you") if you are:

- one of our customers (or it employee) or in a contractual relationship with us (e.g., as a guarantor);
- a member of our customer's family. Indeed, our customers may occasionally share with us information about their family when it is necessary to provide them with a product or service or to get to know them better;
- a prospect interested in our products or services when you provide us with your personal data (in a branch, on our websites and applications, during events or sponsorship operations) so that we can contact you.

When you provide us with third party personal data please ensure you inform such third parties about the disclosure of their personal data and invite them to read this Data Protection Notice. We will use our reasonable endeavours to do the same when possible (e.g., when we have the person's contact details).

2. HOW CAN YOU EXERCISE YOUR RIGHTS IN THE CONTEXT OF OUR PERSONNAL DATA PROCESSING?

You have rights which allow you to exercise real control over your personal data and how we process it.

If you wish to exercise the rights listed below, please submit a request by:

(i) Mailing a letter to the following address: CNH Industrial Capital Europe SAS S.A. Spółka Uproszczona, Grzybowska 78 Street, 00-844 Warsaw,

(ii) Sending an email to our data protection team at: iodo@corp.bnpparibas.com
(iii) Contacting us via our website.

If you have any questions relating to our use of your personal data under this Data Protection Notice, please email our Data Protection Officer: iodo@corp.bnpparibas.com.

1. You can request access to your personal data

We will provide you with a copy of your personal data promptly upon request, together with information relating to its processing.
Your right of access to your personal data may, in some cases, be limited by applicable law and/or regulation. For example regulations relating to anti-money laundering and countering the financing of terrorism prohibits us from giving you direct access to your personal data processed for this purpose. In this case, you must exercise your right of access with the General Inspector of Financial Information which may request the data from us.

2. You can ask for the correction of your personal data

Where you consider that your personal data is inaccurate or incomplete, you can request that we modify or complete such personal data. In some cases you may be required to provide supporting documentation.

3. You can request the deletion of your personal data

If you wish, you may request the deletion of your personal data, to the extent permitted by law.

4. You can object to the processing of your personal data based on legitimate interests

If you do not agree with a processing activity based on a legitimate interest, you can object to it, on grounds relating to your particular situation, by informing us precisely of the processing activity involved and the reasons for your objection. We will cease processing your personal data unless there are compelling legitimate grounds for doing so or it is necessary for the establishment, exercise or defence of legal claims.

5. You can object to the processing of your personal data for direct marketing purposes

You have the right to object at any time to the processing of your personal data for direct marketing purposes, including profiling, insofar as it is linked to such direct marketing.

6. You can suspend the use of your personal data

If you query the accuracy of the personal data we use we will review and/or verify the accuracy of the personal data. If you object to the personal data we process we will review the basis of the processing. You may request that we suspend the use of your personal data while we review your query or objection.

7. You have rights against an automated decision

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or otherwise significantly affects you. However, we may automate such a decision if it is necessary for the entering into or performance of a contract between us, authorised by law or regulation or if you have given your explicit consent.
In any event, you have the right to challenge the decision, express your views and/or request the intervention of a competent person to review the decision.

8. You can withdraw your consent

If you have given your consent to the processing of your personal data, you can withdraw this consent at any time.

9. You can request the portability of part of your personal data

You may request a copy of the personal data that you have provided to us in a structured, commonly used and machine-readable format. Where technically feasible, you may request that we transmit this copy to a third party.

10. How to file a complaint with the Data Protection Authority?

In addition to the rights mentioned above, you may lodge a complaint with the competent supervisory authority, UODO - Personal Data Protection Office (Urząd Ochrony Danych Osobowych) in Poland at ul. Stanisława Moniuszki 1A,
00-014 Warsaw, Poland or on the UODO website: www.uodo.gov.pl.

3. WHY AND ON WHICH LEGAL BASIS DO WE USE YOUR PERSONAL DATA?

In this section we explain why we process your personal data and the legal basis for doing so.

3.1 Your personal data is processed to comply with our various legal and/or regulatory obligations

Your personal data is processed, where necessary, to enable us to comply with the laws and/or regulations to which we are subject, including banking and financial regulations.

3.1.1 We use your personal data to:

- monitor operations and transactions to identify those which deviate from the normal routine/patterns;
- prevent and detect money laundering and financing of terrorism and comply with regulations relating to sanctions and embargoes through Know Your Customer ("kyc") processes (to identify you, verify your identity, screen your details against sanctions lists and determine your profile);
- monitor and report risks (financial, credit, legal, compliance or reputational risks etc.) that the BNP Paribas Group could incur in the context of its activities;
- assist the fight against tax fraud and fulfil tax control;
- record transactions for accounting purposes;
- prevent, detect and report risks related to Corporate Social Responsibility and sustainable development;
- detect and prevent bribery;
- detect and manage suspicious orders and transactions;
- comply with the provisions applicable to trust service providers issuing electronic signature certificates;
- exchange and report different operations, transactions or orders or reply to an official request from duly authorized local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, law enforcement, state agencies or public bodies.

3.1.2 We also process your personal data for anti-money laundering and countering of the financing of terrorism purposes

As part of a banking group, we must have a robust system of anti-money laundering and countering of terrorism financing (AML/TF) in each of our entities managed centrally, as well as a system for applying local, European and international sanctions.
In this context, we are joint controllers with BNP Paribas SA, the parent company of the Group (the term "We" in this section also includes BNP Paribas SA).
The processing activities performed to meet these legal obligations are detailed in Appendix 1.

3.2 Your personal data is processed to perform a contract to which you are a party or pre-contractual measures taken at your request

Your personal data is processed when it is necessary to enter into or perform a contract to:

- define your credit risk score and your reimbursement capacity;
- evaluate (e.g., on the basis of your credit risk score) if we can offer you a product or service and under which conditions (e.g., price);
- provide you with the products and services subscribed to under the applicable contract;
- manage payment incidents and unpaid amounts;
- respond to your requests and assist you;
- Assist you in the context of your inheritance planning.

3.3 Your personal data is processed to fulfil our legitimate interest or that of a third party

Where we base a processing activity on legitimate interest, we balance that interest against your interests or fundamental rights and freedoms to ensure that there is a fair balance between them. If you would like more information about the legitimate interest pursued by a processing activity, please contact us using the contact details provided in section 2. HOW CAN YOU EXERCISE YOUR RIGHTS IN THE CONTEXT OF OUR PERSONNAL DATA PROCESSING? above.

3.3.1 In the course of our business as a financial institution, we use your personal data to:

- manage the risks to which we are exposed:
  - we keep evidence of [operations or] transactions, including in electronic evidence;
  - we carry out the collection of receivables;
  - we manage legal claims and defence our position in the event of litigation;
  - we develop individual statistical models in order to help define your creditworthiness;
  - we receive the location data related to your financed assets to manage, prevent and detect fraud and to better manage credit risk.

- enhance cyber security, manage our platforms and websites, and ensure business continuity.

- use video surveillance to prevent personal injury and damage to people and property.

- enhance the automation and efficiency of our operational processes and customer services.

- carry out financial operations such as debt portfolio sales, securitizations, financing or refinancing of the Group.

- conduct statistical studies and develop predictive and descriptive models for:

  - commercial purposes: to identify the products and services that could best meet your needs, to create new offers or identify new trends among our customers, to develop our commercial policy taking into account our customers' preferences

  - safety purposes: to prevent potential incidents and enhance safety management;

  - compliance purposes (e.g., anti-money laundering and countering the financing of terrorism) and risk management;

- anti-fraud purposes.

- organising contests, lotteries, promotional operations, conduct opinion and customer satisfaction surveys.

3.3.2 We use your personal data to send you commercial offers by electronic means, post and phone

As part of the BNP Paribas Group, we want to be able to offer you access to the full range of products and services that best meet your needs.
Unless you object, we may send you offers electronically for our products and services and those of the Group provided these are related to you professional activity.

We may also send you, by phone and post, unless you object, offers concerning our products and services as well as those of the Group and our trusted partners.

3.3.3 We analyse your personal data to perform standard profiling to personalize our products and offers

To enhance your experience and satisfaction, we need to determine to which customer group you belong. For this purpose, we build a standard profile from relevant data that we select from the following information:
- what you have directly communicated to us during our interactions with you or when you subscribe to a product or service;
- resulting from your use of our products or services ;
- from your use of our various channels: websites and applications (e.g., if you are digitally aware, if you prefer a customer journey to subscribe to a product, or service with more autonomy (selfcare));

Unless you object, we will perform this customization based on standard profiling. If you consent, we may go further to better meet your specific needs by offering you products and services tailored to you.

3.4 Your personal data are processed if you have given your consent

For some processing of personal data, we will give you specific information and ask for your consent. Of course, you can withhold your consent or, if given, withdraw your consent at any time.
In particular, we ask for your consent for:

- tailor-made customization of our offers and products or services based on more sophisticated profiling to anticipate your needs and behaviours;
- any electronic offer for products and services not related to you professional activity;
- use of your navigation data (cookies) for commercial purposes or to enhance the knowledge of your profile.

You may be asked for further consent to process your personal data where necessary.

4. WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

We collect and use your personal data meaning any information that identifies or, together with other information, can be used to identify you.

Depending, among others, on the types of product or service we provide to you and the interactions we have with you, we collect various types of personal data about you, including:

- identification information (e.g. full name, identity (e.g. copy passport, driving licence), nationality, place and date of birth, gender, photograph, video);

- **contact information** private or professional (e.g. postal and e-mail address, phone number etc.);
- **family situation**
- **economic, financial and tax information** (e.g. tax ID, tax status, income and others revenues, financial data);
- **banking and financial information** (e.g. bank account details, products and services owned and used, credit card number, credit history, any defaults in making payments);
- **financed asset location data**;
- **transaction data** (including full beneficiary names, address and transaction details including communications on bank transfers of the underlying transaction);
- **data relating to your habits and preferences** (data which relates to your use of our products and services);
- **data from your interactions with us**: our branches (contact reports), our internet websites, our apps, our social media pages (connection and tracking data such as cookies, connection to online services, IP address), meetings, calls, chats, emails, interviews, phone conversations;
- **video protection** (including CCTV) **and geolocation** ;
- **information about your device** (including MAC address, technical specifications and uniquely identifying data); and
- **login credentials used to connect to BNP Paribas' website and apps**.

We may collect sensitive data such as health data, data relating to criminal offences, subject to compliance with the strict conditions set out in data protection regulations.
Please note that you are not required to provide any of the personal data that we request. However, your failure to do so may result in us being unable to open or maintain your account or to provide you with services.

5. WHO DO WE COLLECT PERSONAL DATA FROM?

We collect personal data directly from you; however, we may also collect personal data from other sources.

We sometimes collect data from public sources:

- publications/databases made available by official authorities or third parties (e.g., the Official Journal of the French Republic, the Trade and Companies Register, databases managed by the supervisory authorities of the financial sector);
- websites/social media pages of legal entities or business clients containing information that you have disclosed (e.g., your own website);
- public information such as that published in the press.

We also collect personal data from third parties:

- from other BNP Paribas Group entities;
- from our customers;
- from our business partners or business introducers;
- from third parties such as credit reference agencies and fraud prevention agencies;
- from data brokers who are responsible for ensuring that they collect relevant information in a lawful manner.

6. WHO DO WE SHARE YOUR PERSONAL DATA WITH AND WHY?

a. With BNP Paribas Group's entities

As a member of the BNP Paribas Group, we work closely with the Group's other companies worldwide. Your personal data may therefore be shared between Group entities, where necessary, to:

- comply with our various legal and regulatory obligations described above;

- fulfil our legitimate interests which are:
  conduct statistical studies and develop predictive and descriptive models for business, security, compliance, risk management and anti-fraud purposes;
  - enhance the reliability of certain data about you held by other Group entities
  - offer you access to all of the Group's products and services that best meet your needs and wishes. This may include, for example, personal data being accessed and/or stored in: jurisdictions where investments are held; jurisdictions in which and through which transactions are effected; and jurisdictions from which you regularly receive or transmit information about your investments or your business with BNP Paribas;
  - customize the content and prices of products and services;

b. With recipients outside the BNP Paribas Group and processors

In order to fulfil some of the purposes described in this Data Protection Notice, we may, where necessary, share your personal data with:

- processors which perform services on our behalf (e.g., IT services, logistics, printing services, telecommunication, debt collection, advisory and distribution and marketing).
- banking and commercial partners, business introducers, independent agents, intermediaries or brokers, financial institutions, counterparties, trade repositories with which we have a relationship if such transmission is required to allow us to provide you with the services and products or execute our contractual obligations or transactions (e.g., banks, correspondent banks, paying agents, exchange platforms, insurance companies, payment system operators, issuers or payment card intermediaries, mutual guarantee companies or financial guarantee institutions);
- local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, public authorities or institutions (e.g., the *Banque de France, Caisse des dépôts et des Consignations*), to which we, or any member of the Group, are required to disclose pursuant to:
  - their request;
  - our defence, action or proceeding;
  - complying with a regulation or a recommendation issued from a competent authority applying to us or any member of the BNP Paribas Group;
- service providers or third party payment providers (information on your bank accounts), for the purposes of providing a payment initiation;
- certain regulated professions such as lawyers, notaries, or auditors when needed under specific circumstances (litigation, audit, etc.) as well as to our insurers or to an actual or proposed purchaser of the companies or businesses of the Group.

7. INTERNATIONAL TRANSFERS OF PERSONAL DATA

In case of international transfers originating from: (i) the European Economic Area ("EEA") to a non-EEA country, the transfer of your personal data may take place where the European Commission has recognised a non-EEA country; or (ii) to a third country, the transfer of your personal data may take place where the European Commission has recognised the third country, as providing an adequate level of data protection. In such cases your personal data may be transferred on this basis.

For transfers to: (i) non-EEA countries where the level of protection has not been recognized as adequate by the European Commission; or (ii) third countries where the level of protection has not been recognized as adequate by the European Commission; we will either rely on a derogation applicable to the specific situation (e.g., if the transfer is necessary to perform our contract with you, such as when making an international payment) or implement one of the following safeguards to ensure the protection of your personal data:

- Standard contractual clauses approved by the European Commission or the EU Commission (as applicable);

- Binding corporate rules.

To obtain a copy of these safeguards or details on where they are available, you can send a written request as set out in section 2. HOW CAN YOU EXERCISE YOUR RIGHTS IN THE CONTEXT OF OUR PERSONNAL DATA PROCESSING? above.

8. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain your personal data for the period necessary to comply with applicable laws and regulations, or for a period defined by our operational constraints, such as keeping our accounts, effective management of the client relationship, as well as to assert rights in court or to respond to requests from regulatory bodies.

9. HOW TO FOLLOW THE EVOLUTION OF THIS DATA PROTECTION NOTICE

In a world where technologies are constantly evolving, we regularly review this Data Protection Notice and update it as required.

We invite you to review the latest version of this document online, and we will inform you of any significant amendments through our website or through our standard communication channels.

Appendix 1

Processing of personal data to combat money laundering and the financing of terrorism

We are part of the BNP Paribas banking Group ("Group") that must adopt and maintain programmes in respect of: (i) anti-money laundering and countering the financing of terrorism (AML/CFT); (ii) anti-corruption; and (iii) international Sanctions (i.e., any economic or trade sanctions, including associated laws, regulations, restrictive measures, embargoes, and asset freezing measures that are enacted, administered, imposed, or enforced by the French Republic, the European Union, the U.S. Department of the Treasury's Office of Foreign Assets Control, and any competent authority in territories where BNP Paribas Group is established) ((i) to (iii) together the "Programmes"). The Programmes, which extend to all Group entities are managed, in part, centrally.

In this context, we act as joint controllers together with BNP Paribas SA, the parent company of the BNP Paribas Group (the terms "we" and "our" when used in this appendix therefore also cover BNP Paribas SA).

To comply with our legal obligations relating to the Programmes, we carry out the processing operations listed below:

- A Know Your Customer (KYC) programme reasonably designed to identify, verify and update the identity of our customers, including where applicable, their respective beneficial owners and proxy holders;
- Enhanced due diligence for high-risk clients, Politically Exposed Persons or "PEPs" (PEPs are persons defined by the regulations who, due to their function or position (political, jurisdictional or administrative), are more exposed to these risks), and for situations of increased risk;
- Written policies, procedures and controls reasonably designed to ensure that we do not establish or maintain relationships with shell banks;
- A policy, based on the internal assessment of risks and of the economic situation, to generally not process or otherwise engage, regardless of the currency, in activity or business:
    - for, on behalf of, or for the benefit of any individual, entity or organisation subject to Sanctions by the French Republic, the European Union, the United States, the United Nations, or, in certain cases, other local sanctions in territories where the Group operates;
    - involving directly or indirectly sanctioned territories, including Crimea/Sevastopol, Cuba, Iran, North Korea, or Syria;
    - involving financial institutions or territories which could be connected to or controlled by terrorist organisations, recognised as such by the relevant authorities in France, the European Union, the U.S. or the United Nations.
- Customer database screening and transaction filtering reasonably designed to ensure compliance with applicable laws;
- Systems and processes designed to detect and report suspicious activity to the relevant regulatory authorities;
- A compliance programme reasonably designed to prevent and detect bribery, corruption and unlawful influence pursuant to the French "*Sapin II*" Law, the U.S FCPA, and the UK Bribery Act.

In this context, we make use of:

- services provided by external providers that maintain updated lists of PEPs such as Dow Jones Factiva (provided by Dow Jones & Company, Inc.) and the World-Check service (provided by REFINITIV, REFINITIV US LLC and London Bank of Exchanges);
- public information available in the press on facts related to money laundering, the financing of terrorism or corruption;
- knowledge of a risky behaviour or situation (existence of a suspicious transaction report or equivalent) that can be identified at the Group level.

We may have to deal with special categories of data or criminal data since the objective is to combat money laundering and the financing of terrorism.

We carry out these checks when you enter into a relationship with us, but also throughout the relationship we have with you, both on yourself and on the transactions you carry out. At the end of the relationship and if you have been the subject of an alert, this information will be stored in order to identify you and to adapt our controls if you enter into a new relationship with a Group entity, or in the context of a transaction to which you are a party.

In order to comply with our legal obligations, we exchange information collected for AML/CFT, anti-corruption or international Sanctions purposes between Group entities. When your data is exchanged with countries outside: (i) the European Economic Area that do not provide an adequate level of protection, the transfers are governed by the European Commission's standard contractual clauses. When additional data are collected and exchanged in order to comply with the regulations of non-EU countries, this processing is necessary for our legitimate interest, which is to enable the Group and its entities to comply with their legal obligations and to avoid local penalties.

Appendix 2
Automated decisions

Some of our personal data processing is fully automated and leads to a decision about you without human intervention.

In this annex, you will find an explanation of the processing operations that involve an automated decision about you.

- Automatic decision to grant financing products and automatic determination of the financing conditions – financing products to professionals and companies

In order to make this decision in an automated way, we base ourselves:

- on the data entered during the financing application (purpose of the financing product, amount, duration, identification information, etc.);
- on the data available to us in the context of our existing relationship and in particular, the data relating to the management of your financing agreements as well as the guarantees granted;
- on publicly available information as well as information that credit institutions are required to consult.

We make sure that the data we use is as up to date as possible.

The decision models on which the decision is based, combine your creditworthiness and your ability to repay, as well as your risk profile as determined by us (e.g. based on statistical models).

We adapt the models to the customer's profile and review them regularly.

The automated decision system will generate one of the below responses:

- Either your application is processed automatically and immediately. You will then receive an answer to your request (whether positive or negative). If positive, you will receive an offer from us, which you can accept by signing the financing contract.
- Alternatively, your application cannot be processed automatically (for example, if it exceeds the limits of what is allowed for an online application).

In any event, you have the right to challenge the decision, express your views and/or request the intervention of a competent person to review the decision.

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