

FAIR PROCESSING NOTICE

Introduction

WEX Fleet Luxembourg S.à r.l., a Luxembourg private limited liability company (société à responsabilité limitée), having its registered office at 19, rue de Bitbourg, L-1273 Luxembourg, registered with the Luxembourg Register of Commerce and Companies under number B 234.548 and our associated companies ("WEX", "we", "our" or "us") hold and process data on all current and former employees, workers, individu (or)5.7(k)-20 (3 1.181 0 Td [{"-3.9 (y)17.8 (o)0.5 (u)0.6 (")-4 ()]TJ /TT3 1 Tf -0.002 Tc 0.002 Tw 3.

We may also obtain some information from third parties, for example, references from a previous employer, medical reports from external professionals, tax authorities, benefit providers or where we employ a third party to carry out a background check (where permitted by applicable law).

In some circumstances, data may be collected indirectly from monitoring devices or by other means (for example, building and location access control and monitoring systems, Closed Circuit television, telephone logs and recordings and email and Internet access logs), if and to the extent permitted by applicable laws. In these circumstances, the data may be collected by WEX or a third party provider of the relevant service. This type of data is generally not accessed on a routine basis but access is possible. Access may occur.2 (e)-12.3 ()0(ur.2 (e11.4 (l)37-8 (i)3.1 (o)-12.3 (n,-)1.157 Td [(e))3.2 ()0.6 (p-1.1 (he 3.1

a) Recruitment and selection

WEX considers that it has a legitimate interest in managing its workforce and operating its business. This includes ensuring that each employee undertakes appropriate duties, are properly trained and undertake their roles correctly and in accordance with appropriate procedures and undertaking normal business operations.

WEX considers effective employee manage

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o)	Complying with applicable laws and regulations (for example maternity or parental leave legislation, working time and health and safety legislation, taxation rules, worker consultation requirements, other employment laws and regulations to which WEX is subject in the conduct of its business);	<p>This processing is necessary for compliance with legal obligations to which WEX is subject.</p> <p>This processing is also necessary for the purpose of the legitimate interests pursued by WEX.</p> <p>WEX considers that it has a legitimate interest in managing its workforce and operating its business. This includes ensuring that each employee undertakes appropriate duties, are properly trained and undertake their roles correctly and in accordance with appropriate procedures. It is also necessary to undertake normal business operations and maintain a dialogue with employees and comply with applicable laws and regulations.</p> <p>WEX considers effective employee management to support its long-term business goals and outcomes. WEX wishes to maintain its reputation and continue to attract high calibre employees.</p>
p)	Planning, due diligence and implementation in relation to a commercial transaction or service transfer involving WEX that impacts on your relationship with WEX for example mergers and acquisitions or a transfer of your employment under applicable automatic transfer rules;	<p>This processing is necessary for compliance with legal obligations to which WEX is subject.</p> <p>This processing is also necessary for the purpose of the legitimate interests pursued by WEX.</p> <p>WEX considers that it has a legitimate interest in managing its business operations in the most effective way. WEX needs to make decisions relating to the future of its business in order to preserve its business operations or grow its business. These interests include the interests of the workforce as a whole and the WEX customer base.</p> <p>WEX considers business transformation to support its long-term business goals and outcomes. WEX wishes to maintain its reputation and continue to attract high calibre employees.</p>
q)	For business operational and reporting documentation such as the preparation of annual reports or tenders for work or client team records including the use of photographic images;	<p>This processing is necessary to perform the contract between you and WEX.</p> <p>This processing is also necessary for the purpose of the legitimate interests pursued by WEX.</p> <p>WEX considers that it has a legitimate interest in managing its workforce and operating its business. This includes ensuring that each employee undertakes appropriate duties and undertaking normal business operations.</p> <p>WEX considers effective employee management to support its long-term business goals and outcomes. WEX wishes to maintain its reputation and continue to attract high calibre employees.</p>
r)	To operate the relationship with third party customers and suppliers including the disclosure of relevant	<p>This processing is necessary to perform the contract between you and WEX.</p>

vetting information in line with the appropriate requirements of customers to those customers, contact or professional CV details or photographic images for identification to clients or disclosure of information to data processors for the provision of services to WEX;

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	laws, court orders, government regulations, or regulatory authorities (including without limitation data protection, tax and employment), whether within or outside your country;	<p>whether those are EU obligations or non-EU obligations. WEX wishes to maintain its reputation as a good corporate citizen and to act appropriately in all the countries in which it does business. This includes cooperating with authorities and government bodies. Indeed, WEX is required to comply with laws and regulations in those countries in which it does business and to require otherwise would lead to conflicts of laws issues.</p> <p>WEX considers legal compliance and managing legal rights to support its long-term business goals and outcomes. WEX wishes to maintain its reputation and continue to attract high calibre employees.</p>
y)	Monitoring programmes to ensure equality of opportunity and diversity with regard to personal characteristics protected under applicable anti-discrimination laws;	<p>This processing is necessary for compliance with legal obligations to which WEX is subject.</p> <p>This processing is also necessary for the purpose of the legitimate interests pursued by WEX.</p> <p>WEX considers that it has legitimate interests in ensuring that it takes action to prevent discrimination and promote an inclusive and diverse workplace.</p> <p>WEX considers effective equality and diversity to support its long-term business goals and outcomes. WEX wishes to maintain its reputation and continue to attract high calibre employees.</p>

Additional information regarding specific processing of personal information may be notified to you locally or as set out in applicable policies.

Legal bases for processing

Processing special categories of personal information or sensitive data

The sensitive or special categories of personal information that may be processed by WEX are set out in this Fair Processing Notice.

Where applicable data protection laws require us to process such special categories of personal information on the basis of a specific lawful justification, we process the same under one of the following bases:

- ” the processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or WEX in the field of employment law, social security and social protection law, to the extent permissible under applicable laws;
- ” the processing is necessary for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws;
- ” the processing is necessary to protect your vital interests or of another person where you are physically or legally incapable of giving consent (for example in exceptional emergency situations, such as a medical emergency); or
- ” the processing is necessary for the establishment, exercise or defence of legal claims.

This may include the following, although this is not an exhaustive list: DocId:32221930-40512121-170

	dealing with complaints arising in this regard;	
d)	Administering your trade union membership and ensuring that any relevant rights that you may have in connection with any Trade Union membership are complied with, as required to enable us to meet our obligations under employment law;	This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or WEX in the field of employment law, social security and social protection law, to the extent permissible under applicable laws.

Management and investigation of any complaint under WEXs of carrying

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Processing data relating to criminal convictions and offences

Personal information relating to criminal convictions and offences will only be processed where authorized by applicable laws.

For example:

- ” a criminal record check may be carried out on recruitment or transfer where authorized by applicable laws; or
- ” an a

Right to restriction of processing

Appendix A

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