

Privacy policy

Preamble

This privacy policy is composed of 2 parts:

- one for **processing activities performed by the parent company**, Europcar International S.A.S.U.
- one for **processing activities performed by the franchisee**

Europcar® is the European leader of car rental and light commercial vehicle rental and operates in over 140 countries, via fully owned subsidiaries as well as franchisees and agents. A Europcar branded vehicle hire station can be operated by a company member of Europcar Mobility Group or by one of our franchisee (i.e. a separate legal entity from the Group).

When renting a car at Europcar, your Personal Data would be processed by **Europcar International S.A.S.U.** in particular for management of your online account and booking and by our franchisee, which deliver the service locally.

Typos and mistakes excepted.

Part 1 - Processing activities performed by Europcar International S.A.S.U

As Europcar Mobility Group parent company, **Europcar International S.A.S.U.** collects and processes various categories of Personal Data in connection with this website and our mobile applications in order to allow you to benefit from the products and services provided by our franchisees.

When you communicate your Personal Data to us or when we collect Personal Data about you, we undertake to use it in accordance with this information notice.

1. What Personal Data do we collect about you?

As Europcar Mobility Group parent company, Europcar International S.A.S.U. collects and processes various categories of Personal Data in connection with this website and our mobile applications in order to allow you to benefit from the products and services provided by our franchisees.

By Personal Data, we mean not only data that identifies you directly, but also data that identifies you indirectly like your Driver ID or the Vehicle Identification Number (VIN) attached to your rental vehicle.

The categories of **Personal Data** that we collect include the following:

- Your **identification data**: surname, first name, email address, telephone number, postal address, date of birth, account identifier
- If applicable, identification data of **additional driver(s)**: surname, first name, email address, telephone number, postal address
- Your **driver's licence** and that of any additional driver(s);
- Payment data**: account numbers, card numbers etc;
- Information on your vehicle reservation**, in particular for the management of any loyalty programs;
- Data relating to your **navigation on our website** or our mobile applications;
- Data relating to your **satisfaction surveys**.

2. For what purposes do we process your Personal Data?

We collect and process your Personal Data for various purposes and on the following legal bases:

Purposes of the processing	Legal basis of the processing
Creating and managing your online customer account on our website or mobile applications.	his processing activity is based on the acceptance of the terms and conditions of use of our website or our mobile applications.

Managing your reservation and rental contract through a central booking engine, in particular to: <ul style="list-style-type: none"> - collect the data necessary to organise your reservation - communicate this data to the concerned franchisee operating the service - manage your payment 	These processing activities is based on our legitimate interest to ensure the execution of the rental services contract that you enter into with our franchisee. You can choose to register your credit card for your future bookings.
Sending you emails about special offers and promotions to promote our products and services.	This processing activity is subject to your consent.
Sending you an email in order to collect your feedback on your rental.	This processing is based on our legitimate interest to have a better knowledge of its customers' needs and to improve its services and customer service.
Managing your loyalty program and third-party partnership loyalty program	This processing is based on the execution of the loyalty program terms and conditions.

3. Who are the recipients of your Personal Data?

3.1. Categories of recipients

Your personal data may be communicated to our employees, our authorized representatives, other companies within our Group and our franchisee network, our agents and intermediaries mandated to provide you with our products and services and if necessary:

- to the relevant franchisee that delivers your service, in particular for the purposes described below (see Part 2);
- to our subcontractors, in particular our IT service providers for hosting, maintenance, or development purposes, who assist us in providing you with our products and services. These may be entities that are members of our Group or external service providers;
- marketing agencies to help us collect and analyse your customer satisfaction;
- to our partners or those of our Group, in particular to enable you to collect loyalty points when you are a member of their program. The list of our partners is available online <https://www.europcar.com/partners/airlines>.

We may also disclose your personal data in accordance with applicable laws and regulations to the relevant authorities.

3.2. International transfers

In order to provide you with our products and services, we may use service providers located outside the European Union. In the event that the vehicle is booked abroad, data transfers will be carried out in the country in question in order to provide you with our mobility solutions. Depending on the assumptions, some recipients may be located in countries recognized by the European Commission as providing an adequate level of protection of personal data or in countries that have not been recognized by the European Commission as providing such a level of protection. In any case, we have implemented appropriate protection measures to protect your personal data in accordance with data protection regulations.

4. How long do we keep your Personal Data?

Your personal data are kept for different periods of time, depending on the purposes of the processing concerned:

Purposes of the processing	Legal basis of the processing
Creating and managing your online customer account on our website or mobile applications.	5 years from the end of the commercial relation
Managing your reservation and rental contract through a central booking engine, in particular to:	5 years from the end of the rental

<ul style="list-style-type: none"> - collect the data necessary to organise your reservation - communicate this data to the concerned franchisee operating the service - manage your payment 	
Sending you emails about special offers and promotions to promote our products and services.	<ul style="list-style-type: none"> - If you are a Europcar customer, 3 years from the end of the business relationship with EC. - If you are not a Europcar customer, 3 years from the collection of your personal data OR from the last time you requested information from us
Sending you an email in order to collect your feedback on your rental.	12 months from the data collection
Managing your loyalty program and third-party partnership loyalty program	For the time of your membership in the loyalty program and then until 4 years from the end of the validity of your loyalty points

5. What rights can you exercise regarding the processing of your Personal Data?

Within the limits and conditions allowed by the regulations in force, you can:

- **access** to your Personal Data and obtain further information on the characteristics of the processing we carry out;
- have your Personal Data **corrected, updated and deleted**, it being specified that deletion can only be carried out when (i) the data is no longer necessary in relation to the purposes for which it was processed, (ii) you withdraw your consent and there is no other legal basis for the processing, (iii) you object to the processing of your personal data and there is no compelling legitimate reason for the processing (iv) it has been established that your personal data has been processed unlawfully, (v) the personal data must be deleted in order to comply with one of our legal obligations
- you **object** to the processing of your Personal Data based on legitimate interest, which you can check by taking a look the table shown in the part "For what purposes do we process your Personal Data" and in particular the column "Legal basis of the processing"
- you **object** to the processing of your Personal Data for commercial prospecting purposes
- receive the personal data you have provided us with or request us to pass them on to a third party when the processing of your personal data (i) has been carried out by automated means and (ii) is based on your consent or on the execution of a contract binding us
- **request the limitation** of the processing of your Personal Data, which means that we will not be able to use your Personal Data for a defined period of time. You can exercise this right when:
 - a) you dispute the accuracy of your personal data for a period of time that allows us to verify the accuracy of your personal data;
 - b) the processing of personal data is unlawful and you object to the deletion of your personal data and instead demand that its use be restricted;
 - c) we no longer need your Personal Data, but they are still required for the establishment, exercise or defence of legal claims;
 - d) you object to the processing for reasons relating to your particular situation, while we are checking whether the legitimate reasons pursued by us take precedence over your own.
- **withdrawing** your consent to treatment based on your consent
- **submit a complaint** to a Supervisory Authority. In France, you can contact the Commission nationale de l'informatique et des libertés (CNIL) at cnil.fr.

6. How do you exercise your rights?

If you would like to know more about the provisions of this information notice or to contact our Data Protection Officer, you can also write to us at the following address: 13 ter Boulevard Berthier, 75017, Paris, or by e-mail to: dpo@europcar.com

To exercise your rights, you must prove your identity by clearly indicating your surname, first names, driver ID and any useful information enabling us to identify you (such as the place and date of your last vehicle rental). You must also give us the e-mail address or the physical address to which you would like the reply to be sent to you.

7. How do we protect your Personal Data?

Europcar International S.A.S.U is committed to protecting the information it collects through our website and mobile applications. In particular, Europcar International S.A.S.U uses appropriate physical, technical and organizational security measures to prevent unauthorized or unlawful processing, accidental loss of or destruction of or damage to your personal data.

8. What rules apply to the processing of your Personal Data when you click on links placed on our website, redirecting to our partner's or other sites?

On this site you will find various links to the websites of our partners (e.g. for travel services). We would like to draw your attention to the fact that this information notice does not apply to the processing of your Personal Data by our partners or other third parties, which may occur when you visit their websites, and that we are not responsible for such data processing. If you would like information on how these partners and third parties process your personal data, we invite you to consult their Privacy Policies.

9. Changes to this information notice

This information notice regarding the Processing Activities performed by Europcar International was last updated on 01.01.2023

Part 2 - Processing Activities performed by the franchisee When delivering your Services, the franchisee collects and processes your Personal Data.

PRIVACY POLICY FOR EUROPCAR AUSTRIA ARAC GMBH

1. WHO PROCESSES YOUR PERSONAL DATA?

Europcar Austria, **ARAC GmbH**, with its registered office at Louise-Piëch-Straße 2, 5020 Salzburg and central administration at Brunner Straße 85, A-1230 Vienna, registered on the commercial register of the Salzburg district court under FN 51993k, is the “controller” for your personal data collected, stored and processed via this website, our mobile apps or our rental locations and agencies in order to offer you mobility solutions.

The terms “Europcar”, “we”, “us” or “our” that we use in this Privacy Policy refer to Europcar Austria, ARAC GmbH. Europcar Austria, ARAC GmbH is the “controller” in accordance with the applicable regulations on the protection of personal data.

When you provide personal data to us or when we collect personal data from you, we undertake to process such data in accordance with this Privacy Policy.

2. WHICH PERSONAL DATA DO WE COLLECT FROM YOU?

As a mobility solutions provider, we collect and process various categories of personal data concerning you when you use our website and mobile apps and in order to provide our products and services to you. We also process data that we receive via disclosures from third parties, such as credit reference agencies.

By personal data, we mean not only data that identifies you directly, but also data that can be used to identify you indirectly. We collect the following categories of personal data in connection with our services and the use of our website and our mobile apps:

- o Your **identification data**: title, surname, first name, email address, telephone number, postal address, driver ID, date and place of birth.
- o If applicable, identification data of the **additional driver(s)**: surname, first name, email address, telephone number, postal address.
- o Details of your **driving licence** and that of any additional driver(s): number, date and place of issue, validity date.
- o Details of your **identity card or passport**: number, date of issue, place of issue, validity date.
- o **Payment data**: account numbers, card numbers, etc.
- o **Financial data**: your invoices.
- o Data on **administrative offences** concerning you, if applicable.
- o Data on **vehicle damage** resulting from accidents and other incidents, if applicable.
- o Information about your **flight** in the event that the pick-up point for your vehicle is an airport.
- o All vehicles in our fleet have a user manual containing instructions for resetting the information and communication systems to their factory settings. It is your responsibility to delete the data you have stored in the **communication systems**.
- o We collect most of your personal data directly from you, but we may also receive personal data from third parties, including the competent authorities responsible for **handling fines for traffic offences**.

3. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

We and the Group collect, store and process your personal data for various purposes and on the following legal bases:

PURPOSE OF THE PROCESSING	LEGAL BASIS FOR THE PROCESSING
Management of your reservation and rental contract, in particular: <ul style="list-style-type: none"> - to confirm, modify or cancel your reservation, -to communicate with you regarding your reservation and rental (e.g. to send you information about your reservation and rental, to send you reminders before you return your vehicle, or to answer your questions or make suggestions), - to manage your rentals, - to manage your payments and invoices, - to manage the collection of amounts due (including subsequent costs such as fines for traffic offences or compensation for damage to the vehicle), - to manage claims, - to take out and manage insurance for your vehicle. 	Processing is necessary for the performance of the rental contract that you enter into with us.
Checking your driving licence and identity card. This check can be carried out manually by our Customer Service department	This check is based on our legal obligations. Processing is necessary for the performance of the rental contract that you enter into with us.
Management of fines for traffic and criminal offences, in particular for: <ul style="list-style-type: none"> - transfer of the personal data of the renting party named in the rental contract to the fine authorities and the investigating authorities for the processing of administrative and criminal offences, - processing the collection of processing fees, towing charges and costs for fine notices if a claim is made against us as the owner of the vehicles. 	Our legal obligations as owner.
Your data is also stored in order to enable our accounting and bookkeeping department to comply with the documentation and retention obligations under commercial and tax law.	Legal obligation.
For exercising or defending against legal claims.	We also process personal data, where required, for the exercise or defence of legal claims. Our legitimate interest in this respect lies in the enforcement of legal claims arising from the contract, the securing of vehicles and the settlement of outstanding accounts. In this respect, the aim is to minimise the following economic risks: property risk, default risk and recovery risk.

Controlling and reporting.	We also process your data for controlling and reporting purposes, as part of our legitimate interest in planning, controlling, monitoring and improving our services.
Credit assessment.	We also process personal data, where required, for credit assessment and risk assessment purposes in connection with our mobility products. In this respect, the aim is to minimise the following economic risks: property risk, default risk and recovery risk.
Marketing activities and market research.	Depending on the application, we process your data for marketing and market research in order to advertise our products. Our legitimate interest is to offer existing or potential customers mobility products tailored to their needs. You have the right to object to the processing of personal data for direct advertising purposes at any time by sending an e-mail to dataprivacy@europcar.at .

4. WHO ARE THE RECIPIENTS OF YOUR PERSONAL DATA?

4.1 Categories of recipients:

In order to achieve the purposes listed above, your data will be transferred to the following recipients as processors for IT services: Europcar International, Porsche Informatik GmbH, Scanpoint GmbH, Q2E GmbH. If necessary, we may also use other web, print, scan, service and IT service providers. Processors may only use the data provided in this context for purposes of performing their prescribed task.

Your data may also be transferred to the following recipients or categories, if required:

- To: Porsche Holding GmbH
Why: legitimate interest in internal auditing, compliance reporting
- To: Kreditschutzverband 1870 (KSV), CRIF GmbH, Bisnode Austria GmbH, WID Wirtschaftsdienst Inkasso GmbH
Why: legitimate interest in credit assessment, risk minimization
- To: legal representatives, courts
Why: legitimate interest in the defence and assertion of legal claims, if required
- To: collection agencies
Why: legitimate interest in the settlement of outstanding payments, if required, property security
- To: auditors
Why: as part of statutory reporting obligations
- To: banks
Why: to process payment transactions, for the performance of contracts
- To: insurance companies
Why: for the settlement of claims within the limits of the rental contract
- To: insurance companies
Why: Fulfillment of contract; the transmission is required to fulfill a contract between the data subject and the responsible or pre-contractual fulfilment measures taken at the request of the data subject. If the vehicle is booked or reserved outside Austria, including third countries outside the European Union, data will be transferred to the country in question in order to make our mobility services available. Depending on the circumstances, some recipients may be in countries recognized by the European Commission as having an adequate level of protection for the

transfer of personal data, or in countries not recognized by the European Commission as having an adequate level of protection. In any case, we have implemented appropriate measures to protect your personal data.

5. FOR HOW LONG DO WE STORE YOUR PERSONAL DATA?

Your personal data is stored for different periods of time, depending on the purpose of the processing:

PURPOSE OF THE PROCESSING	RETENTION PERIODS
Management and archiving of your reservation and rental contract, in particular for: - confirming, modifying or cancelling your reservation, - communicating with you regarding your reservation and rental (e.g. to send you information about your reservation and rental, to send you reminders before you return your vehicle, or to answer your questions or make suggestions), - managing your rentals, - managing your payments and invoices, - managing the collection of amounts due (including subsequent costs such as fines for traffic offences or compensation for damage to the vehicle), - managing claims, - taking out and managing insurance for your vehicle, - breakdown services and claims processing, - compliance with legal retention obligations.	For 7 years after the end of the reservation. As part of the defense and assertion of legal claims, we store your data within the statutory limitation periods.
Management of fines for trafficking criminal offences, in particular for: - transfer of the personal data of the renting party named in the rental contract to the fine authorities and the investigating authorities for the processing of administrative and criminal offences.	For processing administrative offences, in particular the transfer of the personal data of the renting party to the competent fine authority or investigating authority if we are obliged to disclose your personal data (e.g. in the case of administrative offences), processing the collection of processing fees, towing charges and costs for fine notices if a claim is made against us as the owner of the vehicles. Requests for information from the fine authorities are stored for 7 years.

6. WHAT RIGHTS CAN YOU EXERCISE REGARDING THE PROCESSING OF YOUR PERSONAL DATA?

As a general principle, you are entitled to the right of access of the data subject (Art. 15 GDPR), the right to rectification (Art. 16 GDPR), the right to erasure (Art. 17 GDPR), the right to restriction of processing (Art. 18 GDPR), the right to object (Art. 21 GDPR), as well as a right to data portability (Art. 20 GDPR).

Where the processing is based on consent, you as the data subject have the right to withdraw that consent at any time.

You may exercise these rights by contacting dataprivacy@europcar.at.

If you are of the opinion that we have violated Austrian or European data protection law in processing your data and have thereby infringed your rights, we request that you contact us in order to resolve any questions. Of course, you also have the right to lodge a complaint with the Austrian Data Protection Authority or a European supervisory authority.

7. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy was last updated on 11.04.2023.

8. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

Europcar Austria
ARAC GmbH
Data Protection Officer
Brunner Straße 85
A-1230 Vienna
E: dataprivacy@europcar.at