

# 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 Europcar local entities (franchises or subsidiaries entities)**

Europcar® is the European leader of car rental and light commercial vehicle rental and operates in over 140 countries, via fully owned subsidiaries and agents. A Europcar branded vehicle hire station can be operated by a company member of Europcar Mobility Group.

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

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

The Part 1 of this Privacy Policy does not apply to our franchisees and subsidiaries and to their websites or mobile applications.

As the parent company of Europcar Mobility Group, **Europcar International S.A.S.U.** whose registered office is at 13 ter Boulevard Berthier, 75017, Paris (hereinafter referred to as “we”, “us” or “our(s)”) is the "**Data Controller**" of your Personal Data collected and processed via this website and our mobile applications for the purposes defined below.

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.

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 license** and that of any additional driver(s) if you upload your driver license online;

-**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 <b>customer account</b> on our website or mobile applications.	This processing activity is based on the acceptance of the terms and conditions of use of our website or our mobile applications.
Managing your <b>reservation</b> and <b>rental contract</b> through a central booking engine, in particular to:  - collect the data necessary to organize your booking  - communicate this data to the concerned service  - manage your payment	These processing activities are based on our legitimate interest to ensure the execution of the rental services contract that you enter into.  You can choose to register your credit card for your future bookings.
Sending you emails about <b>special offers and promotions</b> to promote our products and services.	This processing activity is subject to your consent.
Sending you an email in order to collect your <b>feedback</b> on your rental.	This process 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 <b>loyalty program</b> and third party	This processing is based on the execution of

partnership loyalty program	the loyalty program terms and conditions.
The operation of the <b>"chat"</b> in real time on our website.	This processing is based on your consent collected via the cookies banner
Conducting <b>satisfaction surveys</b> to improve your experience with our products / services	This processing is based on our legitimate interest to improve our knowledge of our customers' needs and to improve our services and customer service.
Analysis of the navigation data on our website and mobile applications	Please refer to our Cookie Policy.

### 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 agents and intermediaries mandated to provide you with our products and services and if necessary:

a. to the relevant Europcar agency that will deliver our service, in particular for the purposes described below (see Part 2);

b. 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;

c. marketing agencies to help us collect and analyses our customer satisfaction;

d. 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 Europcar Mobility Group partners is available below :

- AAdvantage
- Accor Hotel
- Aeroflot
- Air Europa
- American Express Rewards
- Asia Miles
- Biglife SDN BHD (Air Asia)
- Delta Airlines

- Ecos Mobility & Hospitality Private Limited
- Emirates SkyWard
- Finnair Plus
- Fly SAS
- Flying Blue
- Gulf Air Falcon Flyer
- Lufthansa
- Melia Rewards
- Miles & More
- Oman Air Sindbad
- Qatar Privilege Club
- Parc Asterix
- Radisson Rewards
- Routes Car Rental
- Royal Air Maroc
- Shouqi Car Rental & Leasing Limited Liability Company
- Silvercar
- Singapore Krsiflyer
- TAP Miles & Go
- Times Mobility Co LTD
- Turkish Airlines
- Ubeeqo
- UIA Panorama Club

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	Data retention periods
Creating and managing your online <b>customer account</b> on our website or mobile application.	3 years from the end of the contractual relation or until confirmation of deletion of your account, if you request it.
Managing your <b>reservation</b> and <b>rental contract</b> through a central booking engine, in particular to:  - collect the data necessary to organize your reservation  - communicate this data to the concerned agency operating the service  - manage your payment	5 years from the end of the rental
Sending you emails about <b>special offers and promotions</b> to promote our products and services.	- 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 <b>feedback</b> on your rental.	12 months from the data collection
Managing your <b>loyalty</b>	For the time of your membership in the

program and third party partnership loyalty program	loyalty program and then until 4 years from the end of the validity of your loyalty points
The operation of the "chat" in real time on our website.	3 years from your last commercial contact with us
Conducting <b>satisfaction surveys</b> to improve your experience with our products / services	12 months from your answer to our satisfaction survey.
Analysis of navigation data on our website and mobile applications.	Please refer to our Cookie Policy.

## 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 defense 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](http://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](mailto: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. Changes to this information notice**

This information notice regarding the Processing Activities performed by Europcar International was last updated on April 20th, 2022.

### **Part 2 - Processing Activities performed by Europcar local entities (i.e Europcar Franchisees or subsidiaries)**

Europcar Local Entities (Franchisees or subsidiaries) that provide you the services, may implement other processing activities regarding your Personal Data.

We invite you to consult their Privacy Policy which is accessible on their own local website for any question relating to the protection of your Personal Data processed by these Europcar Local Entities.