

Privacy policy

Preamble

This privacy policy consists of 3 parts:

- one for processing activities of ARAC GmbH and Europear International S.A.S.U. as joint controllers
- one of ARAC GmbH's processing activities as the sole controller
- one is the sole controller of the processing activities of Europear International S.A.S.U.

Europcar® is the European market leader in car rental and light commercial vehicle rental, operating in over 140 countries through wholly-owned subsidiaries, franchisees and agents. A Europcar branded car rental station can be operated by a Europcar Mobility Group company or by one of our franchisees (i.e. a separate legal entity from the group).

Typos and errors excepted.

Personal terms used in these Terms include men and women equally.

Part 1 - Processing activities of ARAC GmbH and Europear International S.A.S.U. as joint controllers

We, the "parties",

Europear International SASU, a French *Société par Actions Simplifiée Unipersonnelle*, having its registered office at 13 ter boulevard Berthier, 75017, Paris, France, registered with the Paris Trade and Companies Register under number 542 065 305.

Hereinafter referred to as "Europear International" or "Data Controller"

ON THE ONE HAND,

AND:

Europcar Österreich ARAC GmbH, a company with registered office at Louise Piëch Straße 2, A 5020 Salzburg, Austria, registered in the commercial register of the Landesgericht Salzburg under number FN 51993 k, represented by **Mr Roland LEITNER**, in his capacity as managing director, and **Mr Martin MOSTBAUER**, in his capacity as **duly authorised** manager,

Hereinafter referred to **as** "ARAC GmbH" **or** "Controller" act as joint controllers in the processing of your personal data. This means that we jointly decide on the purposes and means of processing your personal data and are responsible for its protection in accordance with Article 26 of the General Data Protection Regulation (GDPR).

Note: We may change the terms of this Privacy Policy, in particular if a new processing of personal data is carried out. Please review this statement periodically to ensure that you are happy with the changes. You will be notified of these changes, either by a special notice on our website or by a personal notification.

1. What personal data do we collect about you?

We collect personal information, which is any means, information that relates to you or that allows you to be identified. We process the following personal data/categories of personal data:

The categories **of personal information** 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 the **additional driver**: surname, first name, e-mail address, telephone number, postal address

- -Your **driver's license** and that of another driver;
- -Payment data: account numbers, card numbers, etc.:
- -Financial data: your invoices;
- where applicable, data relating to **traffic violations** or other **fines** and **penalties**:
- Information about your flight in the event that the pick-up location of your vehicle is an airport;

We collect most of your personal data directly from you, but we may receive personal data from third parties, including the competent authorities responsible for administering traffic offence fines



2. For what purposes and how do we process your personal data?

We collect and process your personal data for various purposes and on the basis of the following legal bases. In doing so, we have defined exactly which parties are responsible for each phase:

Thumbtack	Collection	Recording	Organization	Structuring	Storage	Adaptation or modification	Recovery	Constellation	Use	Deletion or destruction
The relationship with customers: - Providing rental services to ECI corporate customers in the franchisee's territory - Creating and managing a customer account - Reservation activities - Rental, the management of your reservation and rental agreement, in particular for: - confirming, modifying or cancelling your reservation, - communicating with you regarding your reservation and rental (e.g. to provide you with information about your reservation - to send you reservations and rentals in order to send you reminders before returning your vehicle in order 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 consequential costs such as fines for traffic violations or compensation for vehicle damage), - to manage claims, - to take out and administer insurance for your vehicle, -Roadside assistance and claims handling.	ECI	ECI	ARAC	ARAC	ECI	ARAC	ARAC	ARAC	ARAC	ECI & ARAC
Management and maintenance of the customer database	ECI	ECI	ARAC	ARAC	ECI	ARAC	ARAC	ARAC	ARAC	ECI
The administration of fines and penalties	ARAC	ARAC	ARAC	ARAC	ECI	ARAC	ARAC	ARAC	ARAC	ECI
Maintaining a list of customers who pose certain risks to our business	ECI & ARAC	ECI & ARAC	ARAC	ARAC	ECI	ARAC	ARAC	ARAC	ARAC	ECI
Fleet management and communication with business partners	ARAC	ARAC	ARAC	ARAC	ECI	ARAC	ARAC	ARAC	ARAC	ARAC



Thumbtack	Legal basis	Retention periods
The relationship with the customers: - To provide rental services to ECI corporate customers in the franchisee's territory - Creation and management of a customer account - Reservation activities - Rental, the management of your reservation and your rental agreement, in particular for: - the confirmation, modification or cancellation of your reservation, - the communication with you regarding your reservation and rental (e.g. to provide you with information about your reservation and rental to send you reminders to answer your questions or provide suggestions before returning your vehicle), - manage your rentals, - manage your payments and invoices, - manage the collection of amounts due (including consequential costs such as traffic fines or compensation for vehicle damage), - manage claims, - take out and manage insurance for your vehicle, -Roadside assistance and claims handling.	Execution of the rental service contract	7 years after the end of the contract
Management and maintenance of the customer database	This processing is based on our legitimate interests. Our legitimate interest is to carry out internal customer management, which provides customers with a better service, including faster processing of enquiries.	7 years after the termination of the contract or if no contract has been concluded at the request of the data subject and no later than 3 years after the commencement of the relationship
The administration of fines and penalties	This processing activity is based on our legal obligations	3 years after the date of payment of the fine or penalty
Maintaining a list of customers who pose certain risks to our business	This processing is based on our legitimate interests. Our legitimate interest is to prevent risks and fraud in connection with the use of our services and improper behaviour towards our employees.	Duration of processing Max. 3 years from the date of occurrence, for cases 1, 2 and 3 Max. 5 years from the time of occurrence or actual knowledge of the situation, for case 4 In any case, until the expiry or termination of the contract. Types of personal data processed 1. Payment incidents that have led to legal action, 2. repeated accidents or damage caused by the driver, 3. intentional accidents or damage, 4. Use of the vehicle in violation of the rental conditions
Fleet management and communication with business partners	This processing is based on our legitimate interests in improving and ensuring communication with companies and fleet management. During a business relationship, we process the professional contact details of contact persons in the company.	7 years after the end of the last contract

3. How long do we keep your personal data?

We do not keep your personal data for longer than is necessary for the purposes for which we process it, in accordance with the regulations.

For the above purposes of processing, we have added the data retention periods.

4. Who else can access your personal data or recipients of data?

We may share your personal information with the list of recipients set out in our Privacy Policy to the extent necessary to provide the Services.

To the extent possible, we store your data on servers located within the European Economic Area (EEA). However, as some of our service providers are based outside the EEA, your personal data will therefore be processed in these countries. In such cases, we take particular care to ensure that such transfer complies with the application rules and that appropriate safeguards are in place with regard to the protection of your personal data, in particular through the use of standard contractual clauses from the European Commission.



We may also need to share your personal information with third parties if it is necessary to comply with a legal obligation or an administrative or judicial decision.

Your data may also be transmitted to the following recipients or categories of recipients in the event of an emergency:

- To: banks, payment service providers
 Why: for processing payment transactions, contract fulfillment
- To: Administrative penal authorities, other public bodies Why: For disclosure in the context of official / judicial measures for the purpose of gathering evidence, criminal prosecution in the context of compliance with legal and regulatory requirements
- -To: insurance companies, workshops and towing companies Why: Claims settlement within the framework of the rental agreement.
- To: Other companies in the Europear franchisee network Why: Fulfilment of the contract, the transmission is for the fulfilment of the

of a contract between the data subject and the controller or to carry out pre-contractual Measures required at the request of the data subject. If the vehicle abroad, including third countries outside the European Union, is booked, reserved or returned, or in the event of a breakdown,

data transfers to the country concerned in order to
To provide the mobility services of the Europear Mobility Group.
Depending on the circumstances, some recipients may be in
countries that are affected by

the European Commission as countries with an adequate
Level of protection for the transfer of personal data
recognised or in countries recognised by the European
Commission as countries with an adequate
level of protection. In any case, we have
appropriate measures, such as standard contractual clauses from the
European Commission, to protect your personal data.
data implemented.

5. What rights can you exercise in relation to the processing of your personal data?

- **Right** to withdraw consent **at any time**:

You have the right to withdraw your consent to the processing of your personal data for any or all of the purposes described above at any time. To do so, please send an e-mail to dpo@europcar.com

- Rights to access, rectify and portability of your personal data

Request access to your personal data, i.e. to receive a copy of it. have your personal data corrected if it is inaccurate or incomplete, which helps us to fulfil our obligation to have up-to-date information about you,

receive a copy of your data in a structured, commonly used and machine-readable format and transmit it to another data controller (also known as the right to data portability);

Right to object

You have the right to object to the processing of your personal data at any time on grounds relating to your particular situation, provided that the data processing is based on our legitimate interest.

 Right to erasure of your personal data and to restrict the processing of your personal data have your data deleted, although this right may be limited in relation to our contractual or legal obligations,

restrict the processing of your personal data in the cases provided for by the $\ensuremath{\mathsf{GDPR}}$

- **How** can you exercise your **rights** in relation to your personal data?

Europear International SASU, you can exercise your rights by contacting us directly at the email address dpo@europear.com or by sending a request by registered letter with acknowledgement of receipt to Europear International SASU 13 ter Boulevard Berthier, 75017, Paris. You may be asked to provide proof of identity.

ARAC GmbH, you can also assert these rights by contacting datenschutz@europcar.at or sending us a registered letter, ARAC GmbH with registered office at Brunner Straße 85, A-1230 Vienna.

Finally, you have the right to lodge a complaint with the CNIL about the processing of your personal data. We encourage you to contact us before making a complaint and we will try to resolve any issues or concerns you may have.

Of course, you also have the right to complain to the Austrian data protection authority.

If you are of the opinion that we have violated Austrian or European data protection law in the processing of your data and have thereby violated your rights, we ask you to contact us in order to be able to clarify any questions.

6. Changes to this Privacy Policy

This information release was last updated on 10.10.2024

7. Contact details of the data protection officer

Europear International SASU, e-mail address dpo@europear.com or send a request by registered mail with acknowledgement of receipt to Europear International SASU 13 ter Boulevard Berthier, 75017, Paris.

ARAC GmbH, e-mail address datenschutz@europcar.at or send us a registered letter, ARAC GmbH with registered office at Brunner Straße 85, A-1230 Vienna.



Part 2 - Processing activities carried out by the franchisee of ARAC GmbH

WHO PROCESSES YOUR PERSONAL DATA?

Europear 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 with the Salzburg Regional Court in the commercial register FN 51 993k, is the controller for the following data and data processing:

2. WHAT PERSONAL DATA DO WE COLLECT FROM YOU?

- Your identification data: title, surname, first name, email address, telephone number, postal address, driver ID, date of birth and place of birth,
- Where applicable, identification data of the additional driver(s): surname, first name, email address, telephone number, postal address,
- Details of your driving licence and the driving licence of each additional driver: number, date and place of issue, expiry date,
- Details of your identity card or passport: number, date of issue, place of issue, expiry date,
- Payment data: account numbers, card numbers, etc.,
- Financial and **creditworthiness data**: your invoices, payment history, data from credit agencies, bank account details
- If applicable, data on administrative offences that affect you,
- Where applicable, data on vehicle damage as a result of accidents and other events;
- Information about your flight in case the pick-up location of your vehicle is an airport,
- 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 traffic offence
 fines. We can also receive creditworthiness data from credit
 agencies if necessary.

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

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

PURPOSE OF PROCESSING	LEGAL BASIS FOR PROCESSING
The administration of fines for traffic offences and offences, in particular for: - the transmission of the personal data of the tenant named on the rental agreement to the fine authorities and investigating authorities for the purpose of processing administrative offences and criminal offences, - the processing of the collection of receivables from Processing fees, towing costs and cost assessments if we are held liable as the owner of the vehicles.	Are our legal Obligations as a keeper.
Your data will also be stored by our accounting	Legal obligation.

and bookkeeping department in order to comply with the documentation and retention obligations under commercial and tax law.	
Exercising or defending legal claims	If necessary, we also process personal data for the exercise or defence of legal claims. Our legitimate interest consists in the enforcement of legal claims arising from the contract, the seizure of vehicles and the settlement of outstanding debts. In this respect, it is also a matter of minimising the following economic risks: property risk, default risk and exploitation risk.
Controlling and reporting	We also process your data for controlling and reporting. As part of our legitimate interest in planning, managing, controlling and improving our services.
Credit rating	If necessary, we also process personal data for credit checks and risk assessments in the context of our mobility products. Our legitimate interest consists in minimizing the following economic risks, property risk, default and exploitation risk.
Automated decisions in individual cases, including profiling in the context of contract execution	Through a query with the company CRIF GmbH, procedures for automated decision-making / profiling are used, which have legal effect on you: When booking a car subscription, your creditworthiness is checked. For this purpose, the following personal data will be transmitted to CRIF GmbH, Rothschildplatz 3/Top 3.06.B, A-1020 Vienna: surname, first name, address and Geburtsdatum.Im the course of this data transmission, we subsequently receive a result or CRIF score (green or red). With a green confirmation, the booking process can be completed; a red feedback blocks the possibility of a fee-based booking for the time being. In a next step, this creditworthiness data is deleted again. In this context, you also have the right to obtain the intervention of a person on the part of ARAC GmbH, to present your own point of view and to contest the decision. You can assert these rights to the e-mail address datenschutz@europcar.at and in particular after submitting a positive Kreditschutzverband 1870 (KSV) statement, your booking can be carried out in any case. CRIF GmbH, as an independent controller, processes the transmitted data for its own purposes as a credit agency and address publisher, as described under www.crif.at/datenschutz.
driver's license and identity card. This check can be done manually by our	Based on our legal obligations.

Customer Service



	For the processing of the rights of data		
	subjects in accordance with the General		
	Data Protection Regulation and the		
	storage and documentation of data		
	subject requests, data transmitted by us will be processed in order to maintain a		
Data protection – data	register of processed data subject		
subject requests	requests. The storage of your data for this		
subject requests	purpose is carried out within the		
	framework of the justification of the legitimate interest in order to be able to		
	demonstrate measures taken in relation		
	to requests by data subjects in the event		
	of an inspection by the Data Protection		
	Authority.		

4. WHO ARE THE RECIPIENTS OF YOUR PERSONAL DATA?

4.1 Categories of recipients:

In order to fulfil the above-mentioned purposes, your data will be transmitted to the following recipients as processors for IT services, Porsche Informatik GmbH, Scanpoint GmbH, Q2E GmbH. If necessary, other web, printing, scanning, service and IT service providers can also be used within the scope of us. The data provided in this way may only be used by processors to perform their specified task.

Your data may also be transmitted to the following recipients or categories of recipients in the event of an emergency:

- 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: Administrative penal authorities, other public bodies Why: For disclosure in the context of official / judicial measures for the purpose of gathering evidence,

- To: Legal representatives, courts

Why: Legitimate interest in the event of an occasion to defend and assert legal claims

- To: Debt collection agency

Why: Legitimate interest in the event of an occasion to settle receivables, property security

- To: Auditor

Why: within the framework of legal reporting obligations

5. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Your personal data will be stored for different periods of time depending on the purpose of the processing:

Purpose of the processing	Retention periods
The verification of your driver's license and identity card. This check can be done manually by our Customer Service	7 years after the end of the reservation.
The administration of fines for traffic offences and offences, in particular for: - the transmission of the personal data of the tenant named on the rental agreement to the fine authorities and investigating authorities for the purpose of processing administrative offences and criminal offences,	3 years after the date of payment of the fine or penalty

- Processing the collection of receivables from Processing fees, towing costs and cost assessments if we are held liable as the owner of the vehicles.	
Your data will also be stored by our accounting and bookkeeping department in order to comply with the documentation and retention obligations under commercial and tax law.	7 years after the end of the reservation. In the context of the defence and assertion of legal claims, we store your data within the framework of the general statutory limitation periods.
Exercising or defending legal claims	In the context of the defence and assertion of legal claims, we store your data within the framework of the general statutory limitation periods.
Controlling and reporting	7 years after the end of the reservation.
Marketing activities and market research	From revocation if the data processing is based on consent or from objection
Data protection – data subject requests	Your data will be stored for 3 years.

All vehicles in our fleet have a user manual that contains instructions for resetting the information and communication systems to factory settings. Deleting the data you have stored in the communication systems is your responsibility.

If your request does not lead to the conclusion of a contract, your data will be deleted again

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

In principle, you have the rights to information (Art. 15 GDPR), correction (Art. 16 GDPR), erasure (Art. 17 GDPR), restriction of processing (Art. 18 GDPR), objection (Art. 21 GDPR), and a right to data portability (Art. 20 GDPR).

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

You can exercise these rights, for example, by contacting datenschutz@europcar.at.

If you are of the opinion that we have violated Austrian or European data protection law in the processing of your data and have thereby violated your rights, we ask you to contact us in order to be able to clarify any questions. Of course, you also have the right to complain to the Austrian data protection authority or a European supervisory authority.

7. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy was last updated on 10.10.2024.

8. CONTACT DETAILS DATA PROTECTION OFFICER

Europcar Austria ARAC GmbH Data protection supervisor Brunner Straße 85 A-1230 Vienna

E: datenschutz@europcar.at



Part 3 - Processing activities carried out by Europear International S.A.S.U

As the parent company of the Europear Mobility Group, **Europear International S.A.S.U.** located at 13 ter Boulevard Berthier, 75017, Paris (hereinafter referred to as "we", "us" or "our") is the "data controller" of your personal data collected and processed through this website and our mobile applications for the purposes defined below.

When you provide us with your personal information, or when we collect personal information about you, we agree to use it in accordance with this Privacy Policy.

1. What personal data do we collect about you?

As the parent company of Europear Mobility Group, Europear International S.A.S.U. collects and processes various categories of personal data related to this website and our mobile applications so that you can benefit from the products and services of our franchisees. By personal data, we mean not only data that directly identifies you, but also data that indirectly identifies you, such as your driver ID or the vehicle identification number (VIN) associated with your rental vehicle.

The categories **of personal information** 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 the **additional driver**: surname, first name, e-mail address, telephone number, postal address
- -Information about your vehicle reservation, in particular for the management of any loyalty programs;
- -Data relating to your **navigation on our website** or mobile applications; data related 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 basis of the following legal bases:

Purposes of processing	Retention periods
Sending emails about special	
offers and promotions to	This processing activity is
promote our products and	subject to your consent.
services.	
Send an email to collect your feedback about your rental.	This processing is based on our legitimate interest in better understanding the needs of its customers and improving its services and customer service.
Managing your loyalty program and the loyalty program for third-party partnerships	This processing is based on the execution of the General Terms and Conditions of the Loyalty Program.

3. Who are the recipients of your personal data?

3.1. Categories of recipients

Your personal data may be shared with our employees, our authorised representatives, other companies within our group and our franchisee network, our agents and intermediaries appointed to provide you with our products and services and, where necessary:

- a. to the relevant franchisee providing your 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 our products and services. These may be companies that are members of our group or external service providers;
- c. Marketing agencies that help us measure and analyse your customer satisfaction:
- d. to our partners or those of our group, in particular to enable you to earn loyalty points if you are a member of their programme. The list of

our partners is available online

https://www.europcar.com/partners/airlines.

We may also share your personal information with the relevant authorities in accordance with applicable laws and regulations.

3.2. International transfers

In order to provide you with our products and services, we may use service providers outside the European Union. In the event that the vehicle is booked abroad, data will be transferred to the respective country in order to provide you with our mobility solutions. Depending on the assumptions, some recipients may be located in countries that have been recognized by the European Commission as providing an adequate level of protection for 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 taken appropriate safeguards to protect your personal data in accordance with data protection legislation.

4. How long do we keep your personal data?

Your personal data will be kept for different periods of time depending on the purpose of the processing:

Purposes of processing	Duration
Sending emails about special offers and promotions to promote our products and services.	- If you are a Europear customer, 3 years after the end of the business relationship with EC - If you are not a Europear customer, 3 years from the collection of your personal data OR from the time you last requested information from us
Send an email to collect your feedback on your rental	12 months from data collection
Manage your loyalty program and the loyalty program for third-party partnerships.	For the duration of your membership in the loyalty programme and thereafter until 4 years after the expiry of your loyalty points

5. What rights can you exercise in relation to the processing of your personal data?

Within the limits and conditions permitted by the applicable regulations, you have the right to:

- **Access** to your personal data and further information about the characteristics of the processing we carry out;
- Have your personal data **rectified**, **updated** and **deleted**, specifying that the erasure can only take place if (i) the data is no longer necessary for 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 ground for the processing (iv) it has become aware that your personal data has been unlawfully processed, (v) the personal data needs to be erased in order to comply with any of our legal obligations
- You **object** to the processing of your personal data on the basis of a legitimate interest, which you can verify by checking the table in the part "For what purposes do we process your personal data" and in particular the column "Legal basis of processing".
- You **object** to the processing of your personal data for commercial prospecting purposes
- receive the personal data you have provided to us or ask us to disclose it to a third party where the processing of your personal data is (i) automated and (ii) based on your consent or on the performance of a contract that is binding on us
- Request restriction of processing of your personal data, which means that we will not be able to use your personal data for a certain period of time. You can exercise this right if:
- a) you contest 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 the personal data is unlawful and you object to the erasure of your personal data and request the restriction of the use of your personal data instead;
- c) we no longer need your personal data but it is still necessary for the establishment, exercise or defence of legal claims;
- d) you object to processing on grounds relating to your particular situation, while we verify that the legitimate grounds we are pursuing override your own.
- Withdraw your consent to treatment based on your consent
- file a **complaint** with a supervisory authority. In France, you can contact the Commission nationale de l'informatique et des libertés (CNIL) by cnil.fr.

6. How do you exercise your rights?

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

To exercise your rights, you must prove your identity by clearly providing your surname, first name, driver's ID and any useful information that allows us to identify you (e.g. the place and date of your last vehicle rental). You must also provide us with the email address or physical address to which you wish to send the response.

7. How do we protect your personal data?

Europear International S.A.S.U is committed to protecting the information it collects through our website and mobile applications. In particular, Europear International S.A.S.U uses appropriate physical, technical and organisational security measures to prevent unauthorised or unlawful processing, accidental loss, destruction 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 and redirect to the websites of our partners or other websites?

On this page 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 does not apply to the processing of your personal data by our partners or other third parties that may occur when visiting their websites and that we are not responsible for this data processing. If you would like information about how these partners and third parties process your personal data, we invite you to consult their privacy policies.

9. Changes to this Privacy Policy

This information notice regarding the processing activities carried out by Europear International was last updated on 10.10.2024.