

PRIVACY POLICY

1. Who processes your personal data

Europcar IB, S.A. whose registered office is located at Av. Partenón 14-16 Madrid hereinafter referred to as "Europcar IB") is the "Data Controller" of your Personal Data collected and processed via this website, our mobile applications, or our rental agencies in order to offer you mobility solutions.

The terms "Europcar", "we", "us" or "our" that we use in this policy refer to Europcar IB. In accordance with the applicable regulations on the protection of personal data, Europcar IB is the "Data Controller".

Europcar IB is a member of the Europcar Mobility Group. The term "our Group" refers to Europcar Mobility Group.

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

2. What Personal Data do we collect about you?

As a provider of mobility solutions, we collect and process various categories of Personal Data in connection with this website and our mobile applications and in order to provide you with our products and services.

By Personal Data, we mean not only data that identifies you directly, but also data that identifies you indirectly.

The categories of Personal Data that we collect in the context of our services and the use of our website and our mobile applications include the following:

- Your identification data: surname, first name, email address, telephone number, postal address, 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.
- Financial data: your invoices,
- As the case may be, data relating to traffic violations
- Information about your flight in the event that the pickup location of your vehicle is an airport,
- Information on your vehicle reservation, in particular to feed the loyalty programs of which you would be a member.
- Data relating to your navigation on our website or our mobile applications;
- Data relating to your satisfaction surveys or from your interactions on our dedicated social media pages;
- Voice, audiovisual and electronic data: recordings of your communications by e-mail, chat or telephone with our customer service department;
- Information collected through our Connected Vehicle (if the vehicle that you rent is a connected one) : vehicle status, damage or accident information, vehicle performance data, operational and diagnostic data, mileage information, acceleration and braking speeds, fuel consumption and fuel levels, tire pressure, odometer readings, vehicle location and other vehicle information. For any information regarding the data processing of Europcar's connected vehicles, please consult the [dedicated Privacy Policy](https://www.europcar.com/files/live/sites/erc/files/connected-cars/privacy-policy.pdf) [link <https://www.europcar.com/files/live/sites/erc/files/connected-cars/privacy-policy.pdf>].
- Data related to cookies and other similar technologies. For information on the use of cookies, please consult our [dedicated cookies policy](https://www.europcar.es/EBE/module/render/Politica-de-Cookies) [Link <https://www.europcar.es/EBE/module/render/Politica-de-Cookies>].

We collect most of your personal data directly from you, but we may receive data from third parties, including the competent authorities in charge of managing fines for traffic violations

3. For what purposes does 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
The creation and management of your customer account	This processing activity is based on the acceptance of the terms and conditions of use of our website or our mobile applications.

<p>The management of your reservation and rental contract, in particular for :</p> <ul style="list-style-type: none"> - Confirming, modifying or cancelling your reservation ; - To communicate with you regarding your reservation and rental (for example, to provide you with information about your reservation and rental, to send you reminder notifications before you return your vehicle, to answer your questions or suggestions); - manage your rental; - manage your payment and invoices; - manage the collection of amounts due (including subsequent costs such as fines for traffic violations, or compensation for damage to the vehicle); - managing claims; - purchase and manage insurance for your Vehicle; xi. purchase and manage insurance for your Vehicle <p>the return of items or objects that you may have left behind in the vehicle and/or rental offices</p>	<p>These processing activities are necessary for the execution of the rental services contract that you enter into with us.</p> <p>You can choose to register your credit card for your subsequent payments.</p>
<p>The checking of your driver's license</p> <p>This validation can be carried out (i) manually by our customer service department or (ii) using a facial recognition device.</p>	<p>(i) This processing is necessary for the performance of the rental services contract that you enter into with us.</p> <p>(ii) The use of the facial recognition solution is based on your consent.</p>
<p>Fight against credit card fraud</p>	<p>This processing is based on our legitimate interest in protecting ourselves against credit card fraud. This processing is based on our legitimate interest in protecting ourselves against credit card fraud.</p>
<p>Conducting satisfaction surveys to improve your experience with our products / services</p>	<p>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.</p>
<p>Chatting in real time on our website.</p>	<p>This processing is based on our legitimate interest in answering users' questions about our products and services.</p>
<p>Conducting business development and marketing activities, including :</p> <ul style="list-style-type: none"> i- sending emails and SMS notifications about special offers and promotions; ii- Recording your rental history to suggest our products and services to you when you search for new bookings or to send you special offers and benefits; iii- managing your loyalty program and membership card; iv- organizing contests and prize draws; v - Sending emails about a booking we have not completed or about the status of your booking requests; vi - the management and updating of the prospect database. 	<p>Our commercial and marketing activities, i.e. the sending of commercial messages to promote our products and services (i to iv) are subject to your consent.</p> <p>In the event that you are already our customer, you may receive commercial messages for products and services similar to those we have already provided to you.</p> <p>The sending of these messages will be based on our legitimate interest in communicating about our products and services.</p> <p>Processing activities included in this category (v) to vi) are based on our legitimate interest to simply and speed up the process of reservation of our client.</p>

	Processing activities included in category (vi) are based on our legitimate interest to manage our prospect database.
The management of fines for traffic offences, in particular for : - transfer to the National Agency for the Automated Processing of Infringements the identity of the main driver mentioned on the rental contract	This processing activity is based on our legal obligations, in particular Royal Decree 6/2015 approving Act Law on Traffic, Circulation of Motor Vehicles and Road Safety
The management and maintenance of a list of clients with certain contractual risks, with regard to : - payment incidents resulting in legal proceedings; - traffic accidents or repeated damage or incivilities towards our employees; - the use of our vehicles in violation of the general rental conditions.	This processing activity is based on our legitimate interest, in particular our interest in asserting our rights, to prevent risks and fraud related to the execution of your lease contract, to prevent and manage incivilities towards our employees. In this respect, we seek to maintain a fair balance between the need to process your Personal Data and respect for your rights and freedoms, in particular the protection of privacy. If you appear on our system alerts of clients, your reservation request will be rejected. You may object this decision by sending an email to the following address: dpo@europcar.com
Video surveillance on our premises	This processing activity is based on our legitimate interest in ensuring the safety of property and persons in our stations, by a deterrent effect or in such a way as to be able to identify the perpetrators of damage, theft or aggression.
Analysis of navigation data on our website and mobile applications	This processing is based on our legitimate interest in improving our products and services.

4. Who are the data recipients of your personal data we collect about you?

4.1 Categories of recipients

If necessary, your personal data may be communicated:

Your personal data will be disclosed, as necessary / relevant, to:

- a) to our employees , our authorized representatives, other companies of our Group and our franchise network, our agents and intermediaries mandated to provide you with our products and
- 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
- c) advertising agencies, marketing agencies, social networking and digital agencies to help us carry out advertising, marketing and sales campaigns and to analyze the effectiveness of these campaigns;
- d) concerning the information necessary for the processing of fines, to GESTHISPANIA or to its foreign counterparts in the case of fines committed abroad ;
- e) concerning the information processed for the management and updating of the list of persons presenting certain contractual risks, to the , security authorities, public authorities, Courts, Rental Cars Associations with a view to its pooling among the member companies of this Rental Branch.
- f) 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.

Europcar Mobilty Group partners:

- Accor Hotel
- Aeroflot
- Air Europa
- Emirates SkyWard
- Flying Blue

- Lufthansa
- Miles & More
- Qatar Privilege Club
- BIGLIFE SDN BHD (Air Asia)
- Delta Airlines
- ROYAL AIR MAROC
- Turkish Airlines
- TAP Miles & Go
- Asia Miles
- Singapore Krsiflyer
- Radisson Rewards
- Melia Rewards
- Gulf Air Falcon Flyer
- Oman Air Sindbad
- UIA Panorama Club
- American Express Rewards
- Fly SAS
- Finnair Plus
- AAdvantage

Europcar Spain's partners:

- Accor
- Melia
- Air Europa
- Renfe

List of Europcar España members:

- f) In relation to the information processed for the payment of fines, to the competent traffic authorities, provided for by Royal Legislative Decree 6/2015, approving the revised text of the Law on Traffic, Circulation of Motor Vehicles and Road Safety or to their foreign counterparts in the case of fines committed abroad.
- g) Insurance companies to provide roadside assistance and accident assistance to drivers with whom we have contracted.
- h) Public entities: Administrador de Infraestructuras Ferroviarias (ADIF), Aena SME, S.A., (AENA), to fulfil the contractual obligations we have assumed in the agreements signed with these entities.
- i) SECURITIFLEET S.L., owner of our fleet of vehicles, as well as, if applicable, other financial entities that own our vehicles and/or any company in our Group, for the sole purpose of complying with the obligation to identify the driver before the competent authority in the event of a traffic offence being committed with the vehicle they have rented both in Spain and in other EEA countries and, in particular, the Netherlands.
- j) Solvency files: in the event that you have a debt with us that is certain, due and payable, and we have previously required you to pay but you have failed to do so within the period established in the General Terms and Conditions, we may transfer this information to an information file - database - on solvency and creditworthiness.

We may also disclose your personal data to the extent required by law and/or by competent authorities.

Use of Facebook

All Facebook features and services available on our website or application are governed by the Facebook Privacy Policy, which you can read for more information about your rights and settings options.

By using one of our website/applications, you can:

- Use Facebook social plug-ins, such as "like" or "share" our content of the Facebook Platform;
- Accept cookies from our website or applications (also known as "Facebook Pixel"), which will help us understand your activities, including information about your device, how you use our services, the purchases you make, and the ads you view, whether or not you have a Facebook account or are logged in to Facebook.

When you use these Facebook features, we collect data that helps us to:

- Display ads that may be of interest to you on Facebook (or Instagram, Messenger or any other Facebook service);
- Measure and analyze the effectiveness of our website, applications and advertisements.

4.2 International transfers

In order to provide you with our products and services, we may use service providers located outside the European Union (in particular in the United States, Morocco and Israel). 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.

For more information about the countries to which your personal data may be transferred, their level of data protection and the potential protective measures implemented by EC, [click here](https://microsite.europcar.com/newsletter/spain/PDF/ESP-ForthePrivacyPolicy-ListofCountries-02052018.pdf?_ga=2.174436194.158891692.1610530947-1153792336.1602578206). [In case the link https://microsite.europcar.com/newsletter/spain/PDF/ESP-ForthePrivacyPolicy-ListofCountries-02052018.pdf?_ga=2.174436194.158891692.1610530947-1153792336.1602578206]

5. 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
The creation and management of your customer account	For the duration of the business relationship and 5 years after the end of the business relationship.
The processing of your reservation and rental contract, in particular for : <ul style="list-style-type: none"> - Confirming, modifying or cancelling your reservation; - Communicate with you regarding your reservation and rental (for example, to provide you with information about your reservation and rental, to send you reminder notifications before you return your vehicle, to answer your questions or suggestions); - manage your rental; - manage your payment and invoices; - manage the collection of sums due (including subsequent costs such as fines for traffic violations, or compensation for damage to the vehicle); - managing claims; - taking out and managing your vehicle insurance 	For 5 years after the end of the reservation
Monitoring of connected vehicles	The data are kept for a period of 12 months. In the event of damage or offences against property, investigation of damage and accidents caused to the vehicle, personal data may be retained until the cases are resolved (including until the closure of any legal or judicial proceedings).
Prevention of credit card fraud	For 13 months from the effective payment
The improvement of our products and services according to your preferences by carrying out satisfaction surveys.	3 years from our last contact
Chatting in real time on our website.	3 years from our last commercial contact
Conducting business development and marketing activities, including : Sending emails and SMS notifications about special offers and promotions; Recording your rental history to suggest products/services to you when searching for new bookings or to send you special offers and benefits;	<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.

<p>sending emails relating to a booking that we have not completed or reporting the status of your booking requests;</p> <p>managing your loyalty program and membership card;</p> <p>organizing contests and prize draws;</p> <p>the management and updating of the prospect database.</p>	
<p>The management of fines, in particular for :</p> <ul style="list-style-type: none"> - transfer to the National Agency for the Automated Processing of Infractions the identity of the main driver mentioned on the rental contract; 	<p>For the time necessary to identify the driver responsible for committing the offence giving rise to the contravention, However, relevant information may be retained for a longer period of time from receipt of the ticket, as part of an interim record keeping policy.</p>
<p>Management and updating of a list of clients with certain contractual risks, with regard to :</p> <ul style="list-style-type: none"> - payment incidents resulting in legal proceedings; - traffic accidents or repeated damage or incivilities towards our employees; - the use of our vehicles in violation of the general rental conditions. 	<p>3 or 5 years from the date of creation or modification of the last rental and depending on the nature of the event</p>
<p>Video surveillance on our premises</p>	<p>A few days up to a month from recording. If there are indications of a crime or alterations in our goods or property or of the persons present in the facilities, they can be kept the necessary time for the resolution of the corresponding claims or legal actions.</p>
<p>Analysis of navigation data on our website and mobile applications</p>	<p>https://www.europcar.es/EBE/module/render/Politica-de-Cookies</p>

6. What rights can you exercise with respect to 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
- **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"
- **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 Europcar IB take precedence over your own.

- **withdrawing your consent** to treatment based on your consent
- **submit a complaint** to a Supervisory Authority. In Spain, the Supervisory Authority is Madrid, Jorge Juan Street , 30 or on the website: www.agpd.es.

7. How do you exercise your rights?

If you would like to know more about the provisions of this privacy policy or to contact our Data Protection Officer, you can also write to us at the following address

Europcar IB S.A., Avda. Del Partenón 16-18, 28042 Madrid

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.

8. How do we protect your Personal Data?

Europcar IB is committed to protecting the information it collects through this website.

In particular, Europcar IB 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.

Europcar IB's systems are configured with data encryption, or scrambling technologies, and industry-standard firewalls. When you send personal information to a Europcar IB website over the Internet, your data is protected by "Transport Layer Security" (TLS) technology to ensure safe transmission.

Any credit card transaction you make through Europcar IB websites is done through our secure server technology. This technology notably:

- a) assures your browser that your data is being sent to the correct computer server, and that the server is secure;
- b) encodes the data, so that it cannot be read by anyone other than the secure server;
- c) checks the data being transferred to ensure it has not been altered.

9. What rules apply to the processing of your Personal Data when you click on links placed on our website, redirecting to our partners' 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 Privacy Policy 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.

10. Changes to this Privacy Policy

This Privacy Policy was last updated on April, 13st, 2021.