

Data Privacy Policy pursuant to Article 13 and 14 GDPR

In the following we would like to inform you about the types of personal data processed by the company SPEED LEASE a.s., having its registered office at Benediktská 690/7, Staré Město, 110 00 Praha 1, Ident. No.: 62912691, (hereinafter also referred to as the “**company SPEED LEASE a.s.**”) and about the purposes of such personal data processing. We would also like to inform you about important legal aspects of personal data protection, such as your rights.

Controller

The party responsible for processing your personal data is the company SPEED LEASE a.s.

Categories of personal data

The following categories of personal data can be processed by us in connection with our services:

- **Master data:** These include, for example, a person's first name, surname, address (place of residence, correspondent address or business), date of birth.
- **Communication data:** These include, for example, a person's telephone number, email address (private and/or business), fax number (if it exists).
- **Contractual data:** These include, for example, the rental information (vehicle category, pick-up and return dates, data of pick-up and return branch, data of booked extra supplements/services), rental contract number, reservation number, driver's licence data, copy of driver's licence, state license plates of the vehicle you rented, and information on customer loyalty and partner programmes.
- **Financial data** such as credit card data.
- **Voluntary provided data:** These are data that you provide to us on a voluntary basis, without us having explicitly requested them, and include information such as your preferences with regard to the vehicle's equipment and category.
- **Special personal data categories:** In the event of an accident, damage to the vehicle, or similar incidents, we process personal data relating to the respective course of events and the damage incurred. These personal data can be provided by customers, passengers or injured parties. The personal data processed in such circumstances can include health-related personal data such as data on injuries, blood alcohol levels, driving under the influence of narcotic substances, and the like.
- **Third-party data:** If, within the scope of your vehicle rental, you provided us with personal data of third parties (e.g., family members, second drivers, passengers), then we will also process these personal data.

The legal basis for personal data processing by the company SPEED LEASE a.s.

Article 6 (1) letter (a) of the General Data Protection Regulation (“**GDPR**”): Pursuant to this provision, the processing of your personal data is lawful if and to the extent that you have given your consent to such processing.

Article 6 (1) letter b) GDPR: Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for the performance of a contract to which you are party,

and/or in order to take steps at your request prior to entering into a contract (e.g., when making the vehicle reservation).

Article 6 (1) letter c) GDPR: Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for compliance with a legal obligation to which the company SPEED LEASE a.s. is subject.

Article 6 (1) letter f) GDPR: Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for the purposes of the legitimate interests pursued by the controller, i.e. the company SPEED LEASE a.s. or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

Article 9 (2) letter f) GDPR: Pursuant to this provision, certain special categories of personal data can be processed if such processing is necessary for the establishment, exercise or defence of legal claims. These special categories of personal data include the health data of the data subjects (for example in connection with an accident).

The purposes of data processing by SPEED LEASE a.s.

1. Reserving and renting motor vehicles

Purposes of data processing

We process your personal data, communication data, contractual data, financial data and any data you have provided voluntarily, for purposes of implementing your reservations and facilitating the conclusion and performance of your rental contract.

We moreover use the personal data, communication data and contractual data for customer services purposes, for example to handle any complaints or changes of reservation that you contact us about.

If you book your vehicle via travel agencies, online travel agencies or other agents, then your basic personal data, communication data, contractual data and, if applicable, financial data, will be transferred to us by our contractual partners.

We also use your personal data, and contractual data for purposes of settling accounts (e.g. commissions and sales processing) with, for example, travel agencies, other agencies, franchise partners and cooperation partners. We also transfer your data to partner companies in the event that we do not have the vehicle or vehicle type requested by you available, to ensure for you, and also to allow you to return your vehicle in another country to the branches of our SIXT network partners (SIXT Group).

We are furthermore legally obliged – for purposes of preventing and investigating criminal offences – to compare your personal data and communication data with official perpetrator lists provided to us. Such comparisons also serve to ward off damage and dangers.

We furthermore use your personal data for your and our security, for example to avoid payment defaults and to prevent property offences (in particular frauds, thefts and embezzlements). If you request to pay for your rental by invoice, then we process your personal data and financial data in order to assess your creditworthiness by obtaining the corresponding information from credit or any other financing companies.

Once both contracting parties have fulfilled their obligations under the rental contract, your personal data, financial data and contractual data will be stored until the statutory retention period expires or until the period for which you have given us the consent.

Legal basis for the personal data processing

Article 6 (1) letter b) GDPR applies to the processing of personal data to the extent required to implement reservations, to conclude and perform contracts and for customer relations purposes.

Article 6 (1) letter f) GDPR applies to the processing of personal data to the extent required to settle accounts vis-à-vis third parties, to assert one's own claims, and to mitigate risks and prevent fraud.

Article 6 (1) letter c) GDPR applies to the processing of personal data to the extent required to detect, prevent and investigate criminal offences, to examine and store driver's licence data, and to comply with the obligation of preservation periods arising from applicable law (in particular from Civil Code and tax law).

Legitimate interest, to the extent that Article 6 (1) letter f) GDPR applies to the type of processing concerned

Our legitimate interests in using your personal data to improve our services and customer services lie in the fact that we want to offer you the best possible services and to sustainably improve customer satisfaction.

To the extent that data processing is required to perform analyses with a view to prevent damage to our company and our vehicles, our legitimate interests lie in maintaining security for costs and preventing economic disadvantages such as those arising from non-payment or the loss of our vehicles.

Categories of recipients of your personal data

For the purposes described in the foregoing, we disclose your personal data based on your consent, or to the extent we are authorized to do so under legal regulations and GDPR to the following recipients: IT service providers, call centres, collection companies, legal and financial services providers, credit and financial companies, agency partners, franchise partners within SIXT Group and other cooperation partners, who are also required to protect the personal data. We always proceed in accordance with laws and GDPR.

Transfer to third countries

If you use our company to reserve vehicles that you want to rent and/or return in third countries, we send your personal data to our contracting partners in the third country concerned. The transfer of your personal data to a third country is based on an adequacy decision by the European Commission. If no adequacy decision by the European Commission exists for the respective third country, then the transfer to that third country will take place subject to appropriate safeguards as per Article 46 (2) GDPR. We can also transfer your personal data to a third country subject to the conditions set forth in Article 49 GDPR. You can request copies of the aforementioned safeguards from company SPEED LEASE a.s. by writing to the address specified above (see → Controller). Third countries are countries outside the European Economic Area. The European Economic Area comprises all countries of the European Union as well as the countries of the so-called European Free Trade Association, which are Norway, Iceland and Liechtenstein.

2. Marketing and direct advertising

Purposes of personal data processing

We process your personal data, communication data and contractual data for purposes of promoting customer loyalty, implementing bonus programmes, optimising customer offers and holding customer events. The customer loyalty programmes we promote include our own programme and the programmes of our cooperation partners. This is solely done on the

basis of the personal data subject's consent, which the data subject is entitled to revoke at any time.

We use your email address with your consent in order to recommend similar products and services offered by us. You may at any time object to your email address being used without incurring more than the cost of transmission of such information about the revocation of the consent.

Legal basis for processing

Article 6 (1) letter a) GDPR applies to personal data processing for purposes of implementing direct marketing measures that require explicit advance consent of data subject.

Article 6 (1) letter f) GDPR applies to personal data processing for purposes of implementing direct marketing measures that do not require explicit advance consent, and of implementing the marketing measures mentioned (→ Purposes of personal data processing).

Legitimate interest, to the extent that Article 6 (1) letter f) GDPR applies to the type of processing concerned

Our legitimate interests in using your personal data for purposes of implementing direct marketing measures and the marketing measures mentioned lie in the fact that we want to convince you of our services quality and promote a lasting customer relationship with you.

Categories of recipients of your personal data

For the purposes described in the foregoing, we disclose your personal data to IT service providers, call centres, advertising partners and providers of customer loyalty programmes to the extent of your consent.

Transfer to third countries

The transfer of personal data to third countries takes place within the scope of partner programmes. The transfer of your personal data to a third country is based on an adequacy decision by the European Commission and to the extent of your consent. If no adequacy decision by the European Commission exists for the respective third country, then the transfer to that third country will take place subject to appropriate safeguards as per Article 46 (2) GDPR. We can also transfer your data to a third country subject to the conditions set forth in Article 49 GDPR. You can request copies of the aforementioned safeguards from the company SPEED LEASE a.s. by writing to the address specified above (see → Controller). Third countries are countries outside the European Economic Area. The European Economic Area comprises all countries of the European Union as well as the countries of the so-called European Free Trade Association, which are Norway, Iceland and Liechtenstein.

3. Damage, accidents, administrative offences

Purposes of personal data processing

If you discover damage to our vehicles, if you or another person cause/causes such damage, or if you or another person are/is involved in an accident with one of our vehicles, then we will process your personal data, communication data, contractual data, financial data and, if applicable, personal data concerning of such an accident including health-related personal data for the following purposes:

- receiving and processing complaints,
- providing customer services in cases of damage,
- settling claims, and

- processing damages resulting from accidents (processing based on information provided by you and third parties such as the police, subsequent renters, witnesses, etc.).

This includes the processing of the aforementioned personal data categories for purposes of settling claims, for example vis-à-vis insurance and financing companies.

When dealing with cases of damage and accidents, we also process your personal data, communication data and contractual data with a view to providing help in the form of our SIXT damage assistance services and mobility guarantee.

We also process your personal data, communication data and contractual data for purposes of fulfilling legal obligations (e.g. providing information to investigating authorities – to administrative authorities and courts).

Should the competent authorities suspect you of having committed an administrative or criminal offence with the use of one of our vehicles or if you have committed it, then we will process not only the personal data pertaining to you that we have stored, but also the personal data conveyed to us by the competent authorities.

We also process your personal data, communication data, financial data, contractual data and, if applicable, personal data concerning health, for purposes of upholding and asserting any claims that we may have against you, for example claims resulting from non-payment or damage caused to our vehicles or other damage.

Legal basis for processing

Article 6 (1) letter b) GDPR applies to personal data processing for purposes of complaints management, providing customer services in cases of damage, and processing damages resulting from accidents.

Article 6 (1) letter c) GDPR applies to personal data processing for purposes of processing damages resulting from accidents.

Article 6 (1) letter f) GDPR applies to personal data processing for purposes of settling claims, asserting any claims that we may have against you, and handling claims relating to administrative offences.

Article 9 (2) letter f) GDPR applies to the processing of personal data concerning health for purposes of establishing, exercising or defending legal claims.

Legitimate interest, to the extent that Article 6 (1) letter f) GDPR applies to the type of processing concerned

Our legitimate interests in using your personal data for purposes of settling claims and asserting any claims that we may have against you lies in our desire to ward off damage to our company and to ensure that we can provide our customers with undamaged vehicles. We are moreover obliged, pursuant to our contractual relations with third parties (e.g. insurance companies and financial companies), to process your personal data for purposes of settling claims.

Recipients/categories of recipients of your personal data

For the purposes described in the foregoing, we disclose your personal data to the following recipients: Public authorities (to administrative investigating authorities and to other authorities and to courts) collecting and financial companies, experts, assistance services providers, lawyers and insurance companies.

Transfer to third countries

In cases of damage and/or accidents suffered in a third country, we send your personal data to the competent authorities or to court and to insurance company in such third country. The transfer of your personal data to a third country is based on an adequacy decision by the European Commission. If no adequacy decision by the European Commission exists for the respective third country, then the transfer to that third country will take place subject to appropriate safeguards as per Article 46 (2) GDPR. We can also transfer your personal data to a third country subject to the conditions set forth in Article 49 GDPR. You can request copies of the aforementioned safeguards from the company SPEED LEASE a.s. by writing to the address specified above (see → Controller). Third countries are countries outside the European Economic Area. The European Economic Area comprises all countries of the European Union as well as the countries of the so-called European Free Trade Association, which are Norway, Iceland and Liechtenstein.

4. Processing based on statutory provisions

Purposes of personal data processing

We process your personal data, communication data, contractual data and financial data for purposes of fulfilling the legal obligations to which the company SPEED LEASE a.s. is subject. These require us to process personal data, for example in order to comply with duties of disclosure vis-à-vis authorities and to comply with the processing requirements as stipulated by tax and civil law provisions (e.g., the preservation period for bookkeeping documents and accounting records according to the relevant legislation).

Legal basis for processing

Article 6 (1) letter c) of the GDPR.

Recipients/categories of recipients of your personal data

The authorities may require us to disclose your personal data to them for the purposes described above.

5. Improving our processes and offerings

Purposes of personal data processing

We process your personal data, communication data and contractual data, as well as any data provided voluntarily, for purposes of optimising our processes and offerings.

This involves, for example, compiling and evaluating rental reports, implementing capacity planning to improve vehicle allocation procedures, setting up a data warehouse, analysing and rectifying sources of error, and conducting customer satisfaction surveys. We moreover process your personal data and contractual data for purposes of optimising our online presence (see → Website).

To improve the quality of our offering (offer of the company SPEED LEASE a.s.) and our customer services of the company SPEED LEASE a.s., we process your personal data and contractual data on the basis of an algorithm with a view to, for instance, creating profiles and probability values in relation to future rentals and to take-up rates for our offers.

We also process your personal data, communication data and contractual data in cooperation with our franchise partners, cooperation partners and agency partners, and for purposes of optimising the related processes and offers (see. → Reserving and renting vehicles).

We also process personal data originating from external service providers to update our address database and to ensure that the personal data we use for contract handling is correct.

Legal basis for the personal data processing

Article 6 (1) letter c) of GDPR applies where consent is required to implement measures intended to optimise our processes and offers.

Article 6 (1) letter f) GDPR.

Legitimate interest, to the extent that Article 6 (1) letter f) GDPR applies to the type of processing concerned

Our legitimate interests in using your personal data to improve our services and customer services lie in the fact that we want to offer you the best possible services and to sustainably improve customer satisfaction.

Categories of recipients of your personal data

For the purposes described in the foregoing, we disclose your personal data to the following recipients: IT service providers, call centres, cooperation partners, agency partners and franchise partners.

Transfer to third countries

Where our cooperation partners, agency partners and franchise partners of SIXT Group are based in a third country, we transmit your personal data to that third country, which also allows you to return vehicles in such countries within the branches of the SIXT Group network. The transfer of your personal data to a third country is based on an adequacy decision by the European Commission. If no adequacy decision by the European Commission exists for the respective third country, then the transfer to that third country will take place subject to appropriate safeguards as per Article 46 (2) GDPR. We can also transfer your personal data to a third country subject to the conditions set forth in Article 49 GDPR. You can request copies of the aforementioned safeguards from the company SPEED LEASE a.s. by writing to the address specified above (see → Controller). Third countries are countries outside the European Economic Area. The European Economic Area comprises all countries of the European Union as well as the countries of the so-called European Free Trade Association, which are Norway, Iceland and Liechtenstein.

6. Events and charity activities

Purposes of personal data processing

We may also process your personal data and communication data to invite you to events as part of our customer service and customer loyalty activities in accordance with your consent. We may moreover use your personal data and communication data for charitable purposes (e.g., to appeal for donations).

Legal basis for the personal data processing

Article 6 (1) letter f) GDPR applies to personal data processing for purposes of acquiring customers, strengthening customer relations and managing business customers.

Legitimate interest, to the extent that Article 6 (1) letter f) GDPR applies to the type of processing concerned

Our legitimate interests in using your personal data for customer service, customer loyalty and charitable purposes lie in our desire to, on the one hand, offer the best possible services and

sustainably raise customer satisfaction, and, on the other, fulfil the social responsibilities that we, as a large company, are bound to.

Categories of recipients of personal data

For the purposes described in the foregoing, we disclose your personal data to the following recipients: IT service providers, call centres, event organisers.

7. Website

Purposes of personal data processing

Your personal data is recorded via SIXT websites if you actively provide such personal data to us as part of a registration procedure, by filling out forms, by sending emails, and, primarily, by making a vehicle reservation. We use these personal data for the purposes described above or for purposes that arise from the respective request, for example, to process specific reservation requests or preferences.

The personal data are only used for advertising purposes to the extent that such advertising is our own (including tell-a-friend features) and solely on the basis of your consent.

Security, SSL technology

The company SPEED LEASE a.s. has implemented a variety of technological, technical and organisational measures in order to protect your personal data, in particular against random or intentional manipulation, loss, destruction and access by unauthorised persons. These security measures will be continually adapted in accordance with technological developments.

Online tracking

Some new browsers use “Do not track” functions. If this is the case, our website may not respond to “Track” requests or may be unable to retrieve the headers of such browsers. To find out more about what your settings are and about whether you want to deny certain providers access to your information, please click [here](#) for the United States of America, [here](#) for Canada, and [here](#) for Europe (please note that opting out will not mean that you are no longer displayed any advertising at all, you will still receive generic advertising).

Cookies

Visits to our website may result in information being stored on your computer in the form of “Cookies”. Cookies are small text files that are copied from a web server onto your hard disk. Cookies contain information that can later be read by a web server within the domain in which the cookie was assigned to you. Cookies cannot execute any programmes or infect your computer with viruses. The cookies used by us neither contain personal data nor are they connected to any such data.

Most of the cookies used by us are so-called session cookies, which are required in order to maintain consistency during your visit, for example by ensuring that the preferences you entered when making your reservation request, as well as any other information entered, are remembered for the duration of your session.

We also need session cookies in order to ensure that any offers (e.g., promotional offers) you click on are assigned to your request. Session cookies are automatically deleted after each ses-

sion. We furthermore use cookies in order to determine, when you pay return visits to our website, whether you are interested in certain types of offers. This enables us to be more targeted about the offers we show you on our website. If you are already registered with us and have a customer account, it will be possible for us to compare the information recorded by the cookies used with the information known to us. This in turn enables us to tune our offers more finely to your needs and wishes, these cookies have a lifespan of one year, after which they are automatically deleted. We also need cookies for purposes of settling accounts with our advertising partners, because cookies are able to record the page or promotional campaign that led the customer to us. As with other data, we record this data exclusively in abstract form so as to ensure that it cannot be used to identify the data subject, a cookie of this type has a lifespan of 31 days.

You have the opportunity to accept or to reject cookies. Most web browsers accept cookies automatically. Generally, however, you will be able to adjust your browser settings so as to reject cookies. If you opt to reject cookies, you may find that you are unable to use some of the website's functions. If you accept cookies, you can opt to delete such accepted cookies at a later point in time. You can delete cookies in Internet Explorer by selecting "Tools" > "Delete Browsing History" and then clicking on the button "Delete Cookies". If you delete the cookies, all settings controlled by these cookies, including advertising settings, will be deleted, possibly irrecoverably.

Storage duration/criteria for storage duration

The company SPEED LEASE a.s. stores your personal data until they are no longer necessary in relation to the purposes for which they were collected or otherwise processed (see → Purposes of personal data processing at company SPEED LEASE a.s.), or within the time period for which you have given your consent. Where the company SPEED LEASE a.s. is under legal obligation to store personal data, it will store personal data for the preservation period stipulated by law. During this period, your personal data may be subject to restricted use within day-to-day operations if its processing serves no further purposes.

Rights of data subjects

Rights pursuant to Article 15 – 18 and 20 GDPR

You have the right to, at reasonable intervals, obtain information about your personal data under storage (Article 15 GDPR). The information you are entitled to includes information about whether or not personal data concerning you are stored, about the categories of personal data concerned, and about the purposes of the processing. Upon request, the company SPEED LEASE a.s. will provide you with a copy of the personal data that are processed.

You also have the right to obtain from the company SPEED LEASE a.s. the rectification of inaccurate personal data concerning you (Article 16 GDPR).

You furthermore have the right to obtain from the company SPEED LEASE a.s. the erasure of personal data concerning you (Article 17 GDPR). We are under obligation to erase personal data in certain circumstances, including if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, if you withdraw the consent on which the processing is based, and if the personal data have been unlawfully processed.

Under certain circumstances, you have the right to have the processing of your personal data restricted (Article 18 GDPR). These include circumstances in which you contest the accuracy of your personal data and we then have to verify such accuracy. In such cases, we must refrain from further processing of your personal data, with the exception of storage, until the matter has been clarified and solved.

Should you opt to change to a different vehicle rental company, you have the right either to receive, in a machine-readable format, the personal data that you provided to us based on your

consent or on a contractual agreement with us, or to have us transmit, also in a machine-readable format, such personal data to a third party of your choice (Right to personal data portability, Article 20 GDPR).

No contractual or legal obligations to provide data/consequences of failure to provide personal data

You are not contractually or legally obliged to provide us with your personal data. Please note, however, that you cannot enter into a vehicle rental contract with us or avail of other services provided by us if we are not permitted to collect and process the data as required for the purposes specified in the foregoing to the minimum extent necessary to enable us to conclude our contractual relationship and to fulfil the contractual and legal obligations by the company SPEED LEASE a.s. (see → The purposes of data processing at the company SPEED LEASE a.s.)

Right to object pursuant to Article 21 GDPR

If the processing of your personal data is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 (1) letter e) GDPR) or if it is necessary in the legitimate interests of the company SPEED LEASE a.s., then you have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data. The company SPEED LEASE a.s. will then end the processing, unless we can present compelling legitimate grounds for such processing that supersede the grounds for ending the processing.

You may object, at any time and without restriction, to the processing of your personal data for purposes of direct advertising.

Right to withdraw consent at any time

If personal data processing by the company SPEED LEASE a.s. is based on solely on your consent, then you have the right to, at any time, withdraw the consent you granted. The withdrawal of consent shall not affect the lawfulness of processing between the time consent was granted and the time it was revoked.

Right to lodge a complaint with the supervisory authority

You have the right to lodge complaints with the supervisory authority responsible for the company SPEED LEASE a.s. Please send such complaints to the following address:

Úřad pro ochranu osobních údajů
Pplk. Sochora 727/27
170 00 Praha 7-Holešovice
Česká republika