

# Privacy Policy

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In the following we would like to inform you about the types of data processed by SIXT and about the purposes of such data processing. We would also like to inform you about important legal aspects of data protection, such as your rights. 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 if we are not permitted to process your data for the following purposes.

This Privacy Policy applies to the processing of personal data in our SIXT branches, on the website [www.sixt.de](http://www.sixt.de) and on other website where this text is available. Please note that for other data processing activities (e.g. in our App or for processing activities of other companies of the SIXT-group) separate privacy policies with different responsibilities may apply. Your attention will be drawn to such separate notices at the time this data is obtained.

### A: Data controller, contact details

The party responsible for processing your data (controller) is Sixt rent a car S.r.l., via Bolzano, 63, 39057, Appiano sulla strada del Vino (BZ), Italia (hereinafter also referred to as SIXT).

If you have any questions regarding data protection, please address your query to the following e-mail address: [dataprotection@sixt.com](mailto:dataprotection@sixt.com)

You can also contact our data protection officer by writing to the above-stated addresses (reference: Data Protection Officer).

### B: Categories of personal data

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

- **Master data:** first name, surname, gender, date of birth, address (private and/or business), Password, customer number
- **Communication data:** telephone number, e-mail address (private and/or business in each case), fax number if applicable, third party phone numbers, communication content (in particular from e-mails)
- **Contract data:** driver's licence data, ID card and passport data, a selfie taken using the camera on your smartphone/tablet, vehicle categories, pick-up and return branch, booked extras/services, reservation and rental contract number, self-generated PIN, result of the credit check,
- **Finance data:** credit card data, account and bank details
- **Voluntary data:** These are personal 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, nature of complaint or answers to a survey
- **Third-party data:** personal data, e.g. of relatives, passengers within the scope of your rental contract
- **Location data of the end device** (when using the SIXT App or Mobile Web Applications): data that reveal the location of your device
- **Vehicle data:** e.g. vehicle identification number, model, manufacturer, licence plate,
- **Telematics data** (for connected vehicles): Vehicle location data (e.g. latitude, longitude, altitude), vehicle status data (e.g. ignition on/off, fuel tank/battery information, mileage); maintenance/vehicle condition data (e.g. warning messages, distance/time until next maintenance); damage data (e.g. impact intensity, rollover alarm),
- **Special categories of data:** in the event of an accident, damage to the vehicle or similar incidents, we process data relating to the respective course of events and the damage incurred. These data may be provided by customers, passengers or injured parties. The data processed in such circumstances can include health-related data such as data on injuries, blood alcohol levels, driving under the influence of narcotic substances, and the like. Biometric data are also processed in the course of validating your SIXT account

### C: The legal basis for data processing at SIXT

Art. 6 (1) sentence 1 point 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.

Art. 6 (1) sentence 1 point 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, or in order to take steps at your request prior to entering into a contract (e.g. when making the vehicle reservation).

Art. 6 (1) sentence 1 point 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 SIXT is subject.

Art. 6 (1) sentence 1 point 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., SIXT, or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, i.e., you yourself.

Art. 9 (2) point a) GDPR: Pursuant to this provision, special categories of personal data may be processed if you have given your consent to the processing of special categories of personal data.

Art. 9 (2) point 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.

## **D: The purposes of data processing at SIXT**

### **1. Setting up a SIXT account**

#### Purposes of data processing

You may set up a SIXT account via our SIXT App or website to avoid having to input data again when making further reservations/rentals and to enjoy other benefits. In order to use some of our digital products (e.g. SIXT share or Mobile Check-in), however, it is mandatory you set up a SIXT account. To set up a SIXT account, we need your master data and communication data.

You can either create an account solely on our platforms or use existing data of social networking services to create an account ("social login"). If you choose social login for account creation, you will be prompted to confirm that we may receive personal data (email address, name and last name) from Google (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland) or Apple (Apple Inc., Apple Park Way, Cupertino, California 95014, USA). The password that you use with the social networking service will not be transmitted to SIXT. If you wish to disable social login for SIXT, you can remove access for SIXT in the settings of the respective social networking service.

To ensure that you only use a validated SIXT account, we regularly check our customer databases. If several SIXT accounts have been created for or by you, they can be merged into a single SIXT account.

#### Legal basis for the above processing

Art. 6 (1) sentence 1 point b), f) GDPR

Our legitimate interest in merging your personal data in case of several SIXT accounts is to optimize our customer database by preventing unnecessary multiple storage.

#### Recipients of your data

For the purposes mentioned above, we may transfer your data to a service provider to validate your SIXT account.

### **2. Validation of identity and driver's license**

#### Purposes of data processing

Your identity and your driver's license is checked within the SIXT app through a photo identification process or by one of our employees in the SIXT branches. To this end, we process your master data, contract data (driver's license data and photo/selfie) as well as special data categories (biometric data) in the case of the app identification procedure, which is done by comparing photos/selfies with the person. We use a multi-stage process that consists of checking the person and checking the documents. Checking the person in the app includes the creation of a photo/selfie. For the so-called liveness check, a short video is created in which you move your head back and forth, for example, to show that you are actually in front of the end device. In both cases the document check includes checking the security features (e.g. holograms) in order to rule out the use of forged documents. In SIXT branches we use camera systems or special card readers and in the case of the app identification procedure the camera of the end device. In order to ensure that the person who is being checked has a valid driver's license and matches the person on the identification documents, for the app identification procedure a comparison is made with the aid of biometric features. Checking people and documents requires that we gain access to the microphone and camera of your device. You can deactivate these authorisations at any time (for more information, refer in detail to our App Privacy Policy).

Once you have been validated, we delete the copy of your ID card as well as your selfie at the latest within 30 days. The copy of your driver's license will be deleted after successful vehicle rental and return, at the latest after 12 months. The information that you hold a driver's licence will be stored in your SIXT account for a maximum of six years and regularly reviewed.

#### Legal basis of the above processing

Art. 6 (1) sentence 1 point a) GDPR in connection with Art. 9 (1) point a) GDPR

Art. 6 (1) sentence 1 point c) GDPR in connection with Road Traffic Law

Art. 6 (1) sentence 1 point f) GDPR in relation to our legitimate interest in preventing fraud to misappropriation of our vehicles by verifying the identity of people to whom our vehicles are delivered. Our legitimate interest in driver's license verification lies in ensuring that only people with a valid driver's license can drive our vehicles.

#### Recipients of your data

For the above-mentioned purposes, we transmit your data to service providers to validate your identity and driver's licence.

### **3. Reserving vehicles**

#### Purposes of data processing

If you would like to rent a vehicle, you can make a reservation in advance by using our SIXT App, website or over the phone. In this context, we process your master data, communication data and contract data, as well as your financial data, where applicable. We process your location data in order to be able to display your nearest SIXT branch in the SIXT App or on our website, provided you have given consent for your location data to be used. You have the option of deactivating access to your location at any time (for more information, refer in detail to our App Privacy Policy). If you book your vehicle via travel agencies, online travel agencies or other agents, then your master data, communication data, rental information and, if applicable, financial information, will be transferred to us by our partners.

SIXT share vehicles can only be reserved using the SIXT App. In this context, we process your master data, communication data, financial data, contract data and your location data. We process your location data in order to be able to display the SIXT share vehicles nearest to your location, provided you have enabled this function. Here you have also the option of deactivating access to your location at any time. Choosing not to activate your location data may result in some functions not working.

We use financial service providers to process payment transactions (including security deposits for credit cards). When carrying out transactions, in addition to the data mentioned above data to determine the user's device can be processed in order to secure the payment transactions and comply with regulatory requirements (e.g. regarding strong authentication during payment transactions).

#### Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR if consent is given.

Art. 6 (1) sentence 1 point b) GDPR for data processing for reservation of vehicles including payment processing and customer service.

Art. 6 (1) sentence 1 point c) GDPR for data processing for the purpose of compliance with regulatory requirements for payment transactions and retention periods under commercial and tax law.

We use financial service providers to process payment transactions (including the deposit of security deposits for credit cards). As part of the processing, data to determine the terminal device used by the user may also be processed in addition to the data mentioned above in order to secure the payment transactions and comply with regulatory requirements (e.g., for strong authentication during payment transactions).

#### Recipients of your data

We disclose your data to the following recipients for the aforementioned purposes: IT service providers, call centres, collection companies, financial services providers, credit agencies, agency partners, SIXT group companies, SIXT-franchise partners and cooperating national companies.

As part of our measures to prevent fraud, we also transmit – in situations where third parties have been, or are at risk of being, defrauded – personal data to such third parties having suffered, or at risk of, fraud.

## 4. Renting vehicles

#### Purposes of data processing

We process your master data, communication data, contract data, vehicle data, financial data and any data you have provided voluntarily for the performance of your rental contract (including conclusion, execution and billing).

We process the master data, communication data, vehicle data and contract data for customer relations purposes, for example to handle any complaints or changes of reservation that you contact us about. We also process your master data and contract data for purposes of settling accounts (e.g. commissions and sales processing) with, for example, travel agencies, other agencies, franchise partners and cooperating national companies. In order to be able to fulfil your reservation request, we transfer your data to partner companies in the event that we do not have the requested vehicle or vehicle type available.

We are furthermore legally obliged – for purposes of preventing and investigating criminal offences – to compare your master and communication data with official perpetrator lists provided to us. Such comparisons also serve to ward off dangers and to facilitate prosecution by the state authorities.

We use financial service providers to process payment transactions (including security deposits for credit cards). When carrying out transactions, in addition to the data mentioned above data to determine the user's device can be processed in order to secure the payment transactions and comply with regulatory requirements (e.g. regarding strong authentication during payment transactions).

If you pay your rental on account, we will then process your master and contract data to be able to assess your creditworthiness by obtaining the relevant information from credit agencies (cf. → Credit check).

We furthermore use your data for your and our security, for example to avoid payment defaults and to prevent property offences (in particular fraud, theft, embezzlement; cf. → Fraud prevention).

SIXT reserves the right not to enter into rental contracts with persons who have shown non-payment, breach of contract or law or improper behaviour towards customers or employees. For this purpose, we process personal data in order to exercise our right to freedom of contract. For this purpose we process your master data and communication data.

In some rental branches we use a technology that verifies the authenticity of ID documents (especially driver's licence) and records the data electronically instead of manually.

Once the rights and obligations under the rental contract have been fulfilled by both parties, your master, payment, vehicle and contract data will continue to be stored until the mandatory retention periods as stipulated by the legislature or regulators in force (normally no

more than ten years).

#### Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR applies to the processing of data to the extent required to conclude and perform rental contracts including payment processing and customer service.

Art. 6 (1) sentence 1 point c) GDPR applies to the processing of data to the extent required to detect, prevent and investigate criminal offences, to comply with regulatory requirements for payment transactions, to examine and store driver's licence data, and to comply with retention periods under commercial and tax law.

Art. 6 (1) sentence 1 point f) GDPR applies to the processing of data to the extent required to settle accounts vis-à-vis third parties, to assert our own claims, and to mitigate risks and prevent fraud.

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 preventing 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.

#### Recipients of your data

We disclose your data to the following recipients for the aforementioned purposes: IT service providers, call centres, collection companies, financial services providers, credit agencies, agency partners, SIXT group companies, SIXT-franchise partners and cooperation partner companies.

As part of our measures to prevent fraud, we also transmit – in situations where third parties have been, or are at risk of being, defrauded – personal data to such third parties having suffered, or at risk of, fraud.

## 5. Returning vehicles

#### Purposes of data processing

When returning the vehicle, we check and document the return time, the vehicle condition, possible damages and any deviations from the reservation details originally agreed on in the rental agreement (e.g. exceeding the agreed mileage limit) in order to be able to issue the invoice correctly and thus process the end of the rental.

Here we process your master, communication and contract data as well as vehicle and telematics data.

At selected branches, we also use damage detection systems that automatically identify and document damages to the vehicle as it passes through (see → [Automated damage detection](#)).

#### Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

## 6. Carrying out the rental contract when renting via the SIXT App

### 6.1. Digital vehicle rental

#### Purposes of data processing

At certain locations, you can book your vehicle independently via the SIXT app or mobile web applications. For this purpose, you will receive corresponding information in advance via email and / or push. A SIXT account with a validated identity and driver's license is required to use these digital services. Prior to the pick-up time indicated in the reservation confirmation, you will be given the opportunity to select a vehicle from the offer list and, if necessary, add other extras to your rental agreement. With the start of the rental via the SIXT app (by confirming the corresponding buttons), we process your master data and contract data for the creation of the contract documents as well as correct billing and invoicing. Once the rental contract has been concluded, you will receive further information on the vehicle key handover. You will need your SIXT app or your reservation number to pick up the vehicle key.

#### Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

### 6.2. Unlocking vehicles via the SIXT App

#### Purposes of data processing

You need to access our vehicles via the SIXT App in order to carry out the rental contract for digital products (e.g. SIXT share or similar). This is done by entering your self-generated PIN and activating the Bluetooth function of your smartphone or via Global System for Mobile Communication (GSM) together with your location data, provided you have enabled this function. You have the option of deactivating access to your location or the Bluetooth function at any time. Choosing not to activate your location data or Bluetooth may result in some functions not working. We require your master data, contract data and telematics data for processing purposes.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) and b) GDPR.

### **6.3. Notification of locking and unlocking errors in the SIXT App**

Purposes of data processing

When using the SIXT App to lock and unlock vehicles, any errors in this process, e.g. a window being left open before returning the vehicle, are displayed and must then be remedied. In this context, we need your contract data, vehicle data and telematics data.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) and f) GDPR.

Our legitimate interest in using your personal data in this type of processing is to prevent property offences in respect of our vehicle fleet and to protect our contractual and non-contractual rights.

### **6.4. Digital parking with SIXT share**

Purposes of data processing

When you use SIXT share, we will cover the parking costs within the business area in accordance with the General Terms and Conditions of Rental of SIXT share. In this context, we process your contract data and telematics data.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) and f) GDPR.

Our legitimate interest in using your personal data in this type of processing is to ensure that our vehicles are legally parked in contractual territories.

### **6.5. Digital payment at partner filling stations and charging stations**

Purposes of data processing

With SIXT share, you can fill up or charge the vehicle yourself at partner filling stations or charging stations and approve the fuel or electricity costs via the SIXT App. For the fueling, select the corresponding pump at a partner filling station in the SIXT App and start the refueling process. You can only select a pump if you have activated your location data in the SIXT App, as this is how it can be determined that you are within a radius of 300 metres of a partner filling station. You have the option of deactivating access to your location at any time. Choosing not to activate your location data results in some functions not working. Once the refuelling process is completed, the fuel quantity and the costs are sent to SIXT for invoicing. In this context, your contract data, telematics data and location data are processed.

With SIXT-share you can charge vehicles at partner charging stations. An overview of these stations is provided in the SIXT app. We process your location data to display the nearest charging stations. For the activation of the charging station, there is a charging card in the vehicle. The charging process described in the SIXT app must be followed.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

### **6.6. Charging vehicles with SIXT charge**

Purposes of data processing

SIXT charge allows you to conveniently charge your vehicle using the SIXT App. With SIXT charge, you can search for charging stations near you, handle the entire charging and payment process and keep an overview of your charging processes. In this context, we process your master data, contract data, communication data and financial data.

We use a charging solution from "Volkswagen Group Charging GmbH" (hereinafter referred to as "Elli"), which we offer you as an intermediary in the SIXT App. You can use this service conveniently in the SIXT App with your SIXT account and the payment method stored there.

For the processing of personal data by "Elli", the data protection information of "Elli" applies, which is made available to you in the SIXT app before you start the charging process.

Legal basis for the above processing

Art. 6 para. 1 sentence 1 lit. b) GDPR.

Recipients of your data

For the aforementioned purposes, we disclose your data to our partner "Volkswagen Group Charging GmbH" ("Elli").



## 6.7. Locking the vehicle via the SIXT App

### Purposes of data processing

With some products (e.g. SIXT share or similar) you need to lock the vehicle again using the SIXT App in order to terminate the rental of these products. Vehicles are locked via the Bluetooth function of your smartphone or via GSM in connection with your location data, provided you have enabled this function. You have the option of deactivating access to your location or the Bluetooth function at any time. Choosing not to activate your location data or Bluetooth may result in some functions not working. We process your contract data and telematics data when vehicles are locked using the SIXT App.

### Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

## 6.8. Returning the vehicle via the SIXT App

### Purposes of data processing

To ensure an orderly return and proper billing for a number of products (e.g. SIXT share or similar), when a vehicle return request is made, we check to see if the vehicle is in the contractual territory or at a suitable location and if it can be returned. We process the length of time you used the vehicle, the mileage and the amount of fuel in the tank to be able to invoice properly, and as just mentioned, we check the vehicle's location to determine whether a ride may be ended in accordance with our conditions. In this context, we process your master data, contract data, communication data, financial data and telematics data.

### Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

## 7. Digital Queue

### Purposes of data processing

As part of our digital queue, our "greeters" welcome you at the entrance of selected SIXT branches, provide you with useful information (e.g. the option to skip the queue with Mobile Check-In) and inform our counters about your arrival. Here we also collect time stamps of your arrival and the time at which you are served at the counter. This serves to shorten waiting times, improve our business processes and thus improve service quality and increase customer satisfaction.

For the above-mentioned purposes we process your master data, communication data and contract data.

### Legal basis for the above processing

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest in processing your personal data for the above-mentioned purposes is to improve service quality and increase customer satisfaction.

## 8. Connected vehicles

### Purposes of data processing

Our vehicles may be linked to each other via what is referred to as connected vehicle functionalities. These enable us to receive various vehicle information (for more information, refer to → [Categories of personal data](#)) and to send certain commands to the vehicle, e.g. when (un-)locking SIXT-share vehicles. The vehicle and telematic data are collected by SIXT or by the respective vehicle manufacturer, enabling us to properly maintain, care for, organise and protect our fleet of vehicles. In this context, we process your contract data, vehicle data and telematics data. The maintenance, care and organization of our vehicle fleet is supported by telematics data in so far as they enable us to react in time to due service intervals, possible damages (e.g. by warning lights and/or control messages) or the like and thus to always provide you with roadworthy vehicles. Telematics data serve to protect our vehicle fleet insofar as they are used (in particular location data) in the event of embezzlements and thefts in order to locate embezzled or stolen vehicles. In addition, telematics data enable us to identify and reconstruct vehicle damages.

Further data processing activities linked to connected vehicles are described at the respective positions in this Privacy Policy where reference is made to telematics data.

Vehicle manufacturers may also collect data through vehicles independently and under their own responsibility, without SIXT having any influence on this data collection or access to this data. In these cases, the privacy policy of the respective manufacturer applies. It is not always possible for us to individually configure the (privacy) settings of the vehicles we offer and to restrict or prevent such data transfers to the manufacturer. Further information regarding the use of personal data by vehicle manufacturers and the applicable terms and conditions related to vehicle and telematic data may be found on the manufacturers' websites.

### Legal basis for the above processing

The relevant legal basis applicable to processing telematics data under this Privacy Policy is determined by how the telematics data are specifically processed. But generally, this is:

Art. 6 (1) sentence 1 point f) GDPR (maintaining, caring for, organizing and protecting our fleet of vehicles).

Our legitimate interest in processing your personal data for maintaining, caring for, organizing and protecting our fleet is to provide you with roadworthy vehicles at all times, to protect our vehicles against embezzlements and thefts and to enable us to provide evidence when asserting, exercising or defending legal claims (e.g. in the event of vehicle damages).

Art. 6 (1) sentence 1 point b) GDPR (Necessary for the fulfilment of the contract in the case of SIXT-share).

#### Recipients of your data

We disclose your data to the following recipients for the aforementioned purposes: IT service providers.

## 9. License Plate Recognition

### Purposes of data processing

In some cases, SIXT uses automated license plate recognition systems. On the one hand, we process the scanned license plate number to enable SIXT vehicles to enter and exit SIXT parking lots or parking garages ticket-free. On the other hand, we process the time stamp when a license plate was scanned by the license plate recognition in order to take into account the correct vehicle return time when issuing the invoice and to be able to fulfil our contractual obligations accordingly.

The license plate recognition system may also scan the license plates of vehicles that do not belong to SIXT, e.g. if SIXT is not the sole user of the parking space or parking garage. In this case, we take technical and organizational measures to ensure that the processing of these license plates is carried out with the least possible intensity. For example, the data are deleted again shortly after collection or they are not even collected in its entirety at all.

### Legal basis for the above processing

Art. 6 (1) sentence 1 point f) GDPR

Our legitimate interest in processing your personal data in the context of license plate recognition is to increase efficiency and customer satisfaction by enabling a convenient vehicle return for the customer and a correct recording of the return time, thus preventing invoicing mistakes due to incorrect return times. This reduces complaints and additional efforts due to incorrectly documented return times and therefore increases customer satisfaction. In addition, license plate recognition enables us to prove the return time when asserting, exercising or defending legal claims.

## 10. Credit check and transmission to credit agencies

### Purposes of data processing

For the purpose of reducing the risk of payment defaults, a credit check may be carried out prior to entering into a contract and as part of an ongoing contractual relationship with customers or business partners. In the course of the credit check, we may transfer your master and contract data to credit agencies in accordance with the applicable legal requirements.

The legal basis for these transfers is Art. 6 para. 1 sentence 1 lit. b) and Art. 6 para. 1 sentence 1 lit. f) GDPR. Data transfers on the basis of Art. 6 para. 1 sentence 1 lit. f) GDPR may only take place to the extent that this is necessary to safeguard the legitimate interests of SIXT or third parties and provided that the interests or fundamental rights and freedoms of the data subject, which require the protection of personal data, do not outweigh this.

In addition, SIXT may transmit information on behaviour in breach of contract and, under the conditions of Section 31 (2) of the German Federal Data Protection Act ("BDSG"), information on payment defaults ("negative data") to credit agencies.

The credit agencies process the data received and may also use it for the purpose of profiling (scoring) in order to provide their contractual partners with information, among other things, to assess the creditworthiness of natural and legal persons. The credit agencies process your personal data as independent controllers. For more information on data processing by the credit agencies, please refer to the data protection information linked below in the "Recipients" section.

### Legal basis for the above processing

Art. 6 (1) sentence 1 point b) and f) GDPR.

Our legitimate interest in processing your personal data to check your creditworthiness is that we want to protect ourselves against payment defaults. Furthermore, SIXT has a legitimate interest in the transmission of negative data for the effective enforcement of our due claims.

### Recipients of your data

For the above-mentioned purpose we transmit data to SCHUFA Holding AG and potentially other credit agencies.

- SCHUFA Holding AG, Kormoranweg 5, 65201 Wiesbaden („SCHUFA“) ([www.schufa.de/en/global/data-protection-gdpr](http://www.schufa.de/en/global/data-protection-gdpr))
- Dun & Bradstreet Deutschland GmbH, Robert-Bosch-Straße 11, 64293 Darmstadt ([www.dnb.com/en-gb/privacy](http://www.dnb.com/en-gb/privacy))
- CRIF GmbH, Victor-Gollancz-Straße 5, 76137 Karlsruhe ([www.crif.de/en/privacy](http://www.crif.de/en/privacy))

## 11. Marketing and direct advertising

### Purposes of data processing

We perform a range of different measures for advertising purposes, to promote customer loyalty, to optimise customer offers and for market research and survey purposes. We may use your data collected over the past three years to offer you rental cars and other mobility solutions, suitable extras or services, such as mileage packages, recommended insurance packages or corresponding additional services like a diesel option. These data also enable us to have your preferred vehicle makes and models available for you. Extras or additional services can be offered to new customers on the basis of preferences shown by similar customers. In this context, we process your master data, contract data and, if enabled, your location data.

SIXT carries out the aforementioned marketing and direct advertising measures for itself and for the companies of the SIXT group listed in the Appendix as well as for SIXT franchisees and SIXT cooperating national companies.

Our marketing measures include raffles that are typically subject to separate terms and conditions. If you participate at one of our raffles, we will process data that you submit to us (usually by entering it in a entry form on our website or in one of our stations) for the purpose of taking part in the competition, to the extent necessary to carry out and conclude the raffle or competition.

We process your e-mail address, which we have received from you in connection with the sale of a product or service, for the purpose of direct advertising for our own similar products or services (compliant with art. 130, sentence 4 Decree 196/2003 "Codice Privacy")

**You can object to your data being processed or used for the purposes of direct marketing at any time without incurring any costs other than those normally applicable to data transmission (e.g. internet connection costs, postage). Please send any objections to: Sixt rent a car S.r.l., reference: Widerspruch (objection), via Bolzano, 63, 39057, Appiano sulla strada del Vino (BZ) Italia or via email to: [dataprotection@sixt.com](mailto:dataprotection@sixt.com)**

In the event of an objection, your e-mail address will be placed on our advertising blocking list. In this way, we ensure that your data is not processed for advertising purposes. If you do not wish to be included in our advertising blocking list, you can also ask us to delete your e-mail address (see → K: Rights of data subjects). However, you may then receive advertising messages again in the future if the legal requirements are met.

### Legal basis for processing

Art. 6 (1) sentence 1 point a) GDPR applies to data processing for purposes of implementing direct marketing measures that require explicit prior consent.

Art. 6 (1) sentence 1 point b) GDPR applies to data processing for the performance of a contract (e.g. contract to participate in a raffle) or in order to take steps prior to entering into a contract.

Art. 6 (1) sentence 1 point f) GDPR applies to data processing for purposes of implementing direct marketing measures that do not require explicit prior consent, and of implementing the marketing measures mentioned (→ Purposes of data processing); Art. 6 (1) sentence 1 point f) i.V.m. Art. 21 (3), Art. 17 (3) point b) GDPR for processing regarding our advertising blocking list.

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 and promote a lasting customer relationship with you.

### Recipients of your data

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

## 12. Payback

If you participate in the PAYBACK programme, PAYBACK Rabattverein e.V., PAYBACK GmbH (together "PAYBACK") and SIXT are joint controllers for certain types of data processing. In this respect, they have stipulated in agreements which entity fulfils which data protection obligations. Upon request, PAYBACK will make the essential content of these agreements available to you. Contact details for PAYBACK and further details of the data privacy policy concerning participation in the PAYBACK programme can be found at <https://www.payback.de/info/hinweise-datenschutz>

## 13. Business customers/payment by third parties

### Purposes of data processing

You can reserve and rent our vehicles in the SIXT App with conditions of your employer. In this case, your personal data are processed in accordance with this Privacy Policy. This also applies mutatis mutandi if a third party is to pay the invoice. We transmit personal data collected during the rental (in particular in the form of invoices and rental contracts, possibly also in the form of monthly statements, as well as possible traffic tickets and accident reports) to your employer or the third party who is to pay your invoice.

You have the option of signing a framework agreement with us electronically. In this context, we process your master data and your telecommunications data. Our service provider will send you a personal link for you to sign the contract electronically.

We also work together with service providers to ensure that our business customer records are up to date. In this context, we transmit company data, which may contain personal data, for instance, about the management and contact details of the contact persons, to our service provider and receive back, where applicable, updated data.

#### Legal basis for the above processing

The relevant legal basis applicable to processing data under this Privacy Policy is determined by how the data are specifically processed.

Art. 6 (1) sentence 1 point b) GDPR applies to the processing of data to the extent required to implement reservations, to conclude and perform rental and framework agreements and for customer relations purposes, otherwise Art. 6 (1) point f) GDPR.

Insofar as the processing of data for the purpose of settling the account with your employer or third parties or for clarification of facts (in particular in the case of accidents or administrative offences) is concerned, our legitimate interest is in being able to assert invoice amounts and other claims or to determine the party against which the damage claim is asserted.

#### Recipients of your data

For the purposes described in the foregoing, we disclose your data to your employer or the third person that will settle your invoice.

### 14. Damage, accidents and fines

#### Purposes of data processing

In the event of damage being done to our vehicles, or our vehicles being involved in accidents, we process your personal data for the following purposes:

- providing customer services in cases of damage,
- handling claims,
- processing damage resulting from accidents (processing based on information provided by you and third parties such as the police, subsequent renters, witnesses, etc.),
- settling claims,
- receiving and processing complaints,
- providing help and assistance,
- securing and asserting our own claims.

In this context, we process your master data, communication data, contract data, financial data, third-party data, vehicle data, telematics data and, where applicable, special categories of personal data (health data).

In case you should be suspected by the competent authorities of having committed an infraction or crime with one of our vehicles, we will process, in addition to the identification data stored by us, the data transmitted to us by the competent authorities.

#### Legal basis for processing

Art. 6 (1) sentence 1 point b), c), f) GDPR and Art. 9 (2) point f) GDPR.

Our legitimate interest in processing your personal data is to reconstruct and handle damage and accident cases and to thereby protect our company against damage. This also includes our legitimate interest in exercising or defending legal claims when handling damages and accidents. We also have a legitimate interest in always providing you with damage-free vehicles. We are moreover obliged, pursuant to our contractual relations with third parties (e.g. insurance companies), to process your data for the purpose of settling claims. Our legitimate interests in this respect lie in ensuring that we observe the contract terms.

### 15. Automated damage detection

#### Purposes of data processing

At certain locations, SIXT uses automated damage detection systems equipped with multiple cameras that are installed at the respective return stations. The cameras of these damage detection systems take high-resolution photos of the entire vehicle in order to determine any damage to the vehicle. Here, we process contract data, vehicle data and photos.

The processing of this data takes place to identify SIXT vehicles that pass through the damage detection system and to automatically detect and document any existing damage. Through technical and organizational measures, it is ensured that only data from SIXT vehicles are further processed.

#### Legal basis for processing

Art. 6 para. 1 sentence 1 letter f) GDPR

Our legitimate interest in processing your personal data in the context of automated damage detection is to increase efficiency and customer satisfaction, as well as the possibility to provide evidence when enforcing, exercising or defending legal claims. The increase in efficiency is expressed in the elimination of the manual and time-consuming vehicle check. Customer satisfaction is increased insofar as

all damage to a vehicle is documented at all times by the automatic damage detection system and it is thus possible to determine whether a customer has caused a detected damage or whether this damage was already present before the vehicle was used.

#### Recipients of your data

For the above-mentioned purposes, we transmit your data to service providers/suppliers of damage detection systems.

### 16. Fraud prevention

#### Purposes of data processing

We use cookies and other technologies to process data (→ cf. Cookies and similar technologies) to determine the end device used by the user and user behaviour. The data is stored in databases for fraud prevention, so we can determine, for example, whether login procedures have already been carried out with your end device in the past and whether the device is correspondingly "trustworthy". If you log on with unknown end devices, we can inform you that this may represent a security risk. The databases also store data on end devices that have already been used to commit (attempted) fraud, as well as any associated master data, communication and contract data. During a reservation process, we retrieve a risk assessment concerning the user's end device from the database of a specialised service provider. This risk assessment on the probability of a fraud attempt takes into account, among other things, whether the end device has connected via different service providers, whether the end device shows that the geo reference changes frequently, the number of transactions that have been made via the end device, and whether a proxy connection is used. In addition, for the purpose of risk assessment, we check whether your e-mail address has been reported for conspicuous behaviour or fraud patterns in the database of specialised fraud prevention service providers in the past and include this into our own decision to execute contracts or issue vehicles.

#### Legal basis for processing

Art. 6 (1) sentence 1 point f) GDPR

Our legitimate interest in using your personal data in this type of processing to prevent property offences is to protect our vehicle fleet and our contractual and non-contractual rights.

#### Recipients of your data

For the above-stated purpose, we transmit data to specialized fraud prevention providers. Those providers may be located in countries that do not have an adequate level of data protection (in such a case, however, the data transfers are made on the basis of appropriate safeguards, cf. → G: Transfer to third countries).

### 17. Breach of contract or the law

#### Purposes of data processing

In the event of signs of criminal activity, e.g. theft, embezzlement, joy-riding, unauthorised use of vehicles or of vehicles being used in breach of contract, e.g. exceeding the maximum rental period or subrenting, we will take the following action for the purposes of preventing damage and protecting the ownership of our vehicles, vehicle parts and fuel:

- Leaving the contractual territory: Some of our vehicles are equipped with an telematic alarm system that alerts us in the event you leave the contractual territory. An automatic notification is sent to us by way of this alert. At the same time this automatic notification is sent, master data, communication data, contract data and telematics data are attributed to you so that you can be contacted and made aware of the breach of contract.
- Locating stolen vehicles: In order to locate vehicles in the event of theft or embezzlement, some of our vehicles are equipped with an telematic alarm system, which is only used if there is a well-founded suspicion of unlawful behaviour in a specific case. In such a case, vehicle and telematics data can be attributed to you.
- Unauthorised tyre change/fuel tank emptying: our vehicles are equipped with an alarm system to detect any unauthorised tyre changes or fuel tank emptying. An automatic notification is sent by way of this alert. Master data, contract data, communication data, vehicle data and telematics data are only attributed to you if such unauthorised conduct is detected.
- Detection of eligibility for a voucher: To detect eligibility for a voucher for the initial journey with our digital products (SIXT share), your data may be reconciled when you set up a SIXT account. On this occasion, we process your master data, communication data, contract data,
- Forwarding your data to the authorities: we may forward your master data, communication data, contract data, financial data and telematics data to the (criminal investigation) authorities in cases of criminal conduct or a risk being posed to public safety.

Should the competent authorities suspect you of having committed an administrative (e.g. speeding or parking illegally) or criminal offence with one of our vehicles then we will process not only the master data pertaining to you that we have stored, but also the data conveyed to us by the competent authorities.

#### Legal basis for processing

Art. 6 (1) sentence 1 point c), f) GDPR in conjunction with the respective statutory regulation.

Our legitimate interest in using your personal data lies in protecting our property by means of the aforementioned measures so as to protect our company against damages. We also have a legitimate interest in protecting our fleet of vehicles as well as our contractual and

extra-contractual rights.

## **18. Improving our processes and offerings**

### **Purposes of data processing**

To improve the quality of our processes and offers, as well as to optimise our customer relations, we perform analyses of potential, with the aid of probability values in respect of future rentals and take-up rates for our offers, which take the form of evaluations and reports as well as customer satisfaction surveys, with a view to meeting the expectations of our customers in terms of providing high-quality products and services. This also serves to enable us to define sales revenue targets for our company, optimise capacity planning to improve vehicle usage as well as to identify and troubleshoot sources of errors. Our customers are grouped according to specific criteria in order to perform the analyses of potential. These criteria include in particular order history, sales revenues and claim statistics.

We also process your master data, communication data and contract data in connection with our collaboration with agency partners, SIXT group companies, SIXT-franchise partners and cooperating national companies for purposes of optimising the related processes and offers (cf. → Reserving vehicles, → Renting vehicles).

The aforementioned processing activities are carried out with the aid of data base applications to effectively administer and analyze the collected data. We further use the data base applications for internal purposes, e.g. business evaluations, marketing strategies, price calculation for our products and cost controls.

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

### **Legal basis for processing**

Art. 6 (1) sentence 1 point a) of the General Data Protection Regulation (GDPR) applies where consent is required to implement measures intended to optimise our processes and offers.

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest in using your personal data lies in improving our services and further developing our products on an ongoing basis. We also have a legitimate interest in improving customer satisfactions levels.

## **19. Refer a friend programme**

### **19.1. Personal data of recommender**

#### **Purposes of data processing**

Under the Refer a friend-Program registered SIXT customers ("Recommender") are able to easily recommend SIXT services to their friends and relatives ("Friend"). For this purpose, the Recommender is provided with a referral link which he/she can forward to friends and relatives by using his/her preferred channel (e.g. by SMS, e-mail, WhatsApp, Facebook Messenger). Recommender as well as Friend will each receive a premium for every Friend who registered via the forwarded referral link and who then uses SIXT services.

As far as you as a Recommender participate in our Refer a friend-Program part of your master data and communication data (first name, last name, e-mail address and your IP address) will be processed for the purpose of program implementation as well as premium handling and avoidance of fraud. In addition, every referral link contains a unique identification (containing your first and last name) which enables us to track whether the friend you have contacted is registering for our offer. Participation in our Refer a friend-program is voluntary. Please note that without providing your data you cannot participate in the Refer a friend-program.

#### **Legal basis of the processing**

Art. 6 (1) sentence 1 point b) GDPR for data processing for the purpose of implementation of the Refer a friend-program and fulfilment of the respective contractual obligations including your right of participation, technical processing of the program, provision of the premium

#### **Recipients of your data**

For the purposes described in the foregoing we use IT service providers as well as providers of customer loyalty or bonus programs where required for the technical processing of the Refer a friend-program. They get access to the following data: first name, last name, e-mail address and IP address of the Recommender.

### **19.1. Personal data of Friend**

#### **Purposes of data processing**

The recommendations sent by Recommender to friends, relatives or acquaintances contain a referral link which enables the respective recipient ("Friend") to register for our offer. We only receive personal data from you as a Friend when you, as recipient of a referral, click on the referral link. As part of the Refer a friend-program we only provide Recommender with a referral link which from a technical point of view enables us to record a Friend's registration and assign it to Recommender in order to provide both Recommender and Friend with a premium subject to a successful referral. It is Recommender's responsibility to whom they send the referral link in order to recommend



a person. In case you ignore the recommendation by not clicking on the referral link, neither SIXT nor any possible service provider involved as part of the Refer a friend-program will receive and process your personal data.

Every referral link contains a unique identification of Recommender (including first and last name) which enables us to assign your registration to Recommender. In case you, as recipient of a referral, click on the referral link we gather and process this information in order to determine whether your registration follows a recommendation as well as to handle the premium. We can only explicitly assign this information to your person if you register as a customer for our offer and in this context provide your master data. The processing of the data gathered as part of the Refer a friend-program will be carried out exclusively for the purpose of ensuring the premium for you and Recommender and in order to allow for the respective registration for the SIXT offer.

#### Legal basis of the processing

Art. 6 (1) sentence 1 point b) GDPR for data processing for the purpose of providing the premium as part of the registration and set up of your account.

Art. 6 (1) sentence 1 point f) GDPR for data processing for the purpose of implementing the Refer a friend-program, in particular the assignment of the referral to Recommender for the provision of the premium.

Our legitimate interests in using your personal data for the purpose of implementing the Refer a friend-program lies in our desire to ensure the effective and user-friendly handling of the program, in particular the proper recording of a Friend's registration in order to provide Friend and Recommender with the premium as well as to fulfil the respective contractual obligations vis-à-vis Recommender.

#### Recipients of your data

For the purposes described in the foregoing we use IT service providers as well as providers of customer loyalty or bonus programs where required for the technical processing of the Refer a friend-program. They get access to the following data: first name, last name and email address of the Friend.

## 20. Customer Service

#### Purposes of data processing

You can contact our Customer Service by telephone, e-mail, chat and classic mail. Depending on the reason for your request, we may process master data, communication data or contract data in this context.

For our chat service, we store message histories for up to 90 days. You can decide at any time which personal data you would like to disclose during the chat. To provide the service, we use a voice and chat solution provided by Amazon Web Services, Inc. and its affiliates (collectively "AWS"). More detailed information about AWS's activities can be found online at <https://aws.amazon.com/privacy/>.

To troubleshoot a technical issue with a connected vehicle, you can also contact our Customer Service. The Customer Service can remotely unlock or lock a vehicle for you after verifying a number of security features. Therefore, certain features can be requested to identify you (e.g. driving licence number, date of birth, self-generated PIN and location provided by you). The location can be compared with GPS location data of the vehicle. In this context, we process your master data, contract data, communication data, telematics data and location data.

#### Legal basis for processing

Art. 6 (1) sentence 1 point b) GDPR.

## 21. Customer Service Messenger & Chatbot

#### Purposes of data processing

We offer a messenger / chatbot on our websites and in the SIXT-App that provides you with immediate support on topics such as reservations & rentals, invoices and general questions. You can start a conversation by clicking on the SIXT Customer Service AI Bot widget. Depending on your request and its complexity the SIXT Customer Service AI Bot either solves your request independently or forwards it to a human customer service agent with whom you can communicate via chat. In this context, we may process your master data, contract data, communication data, third-party data, vehicle data, finance data and voluntary data that you provide in the chat.

#### Legal basis for processing

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest in using your personal data in this type of processing is to increase efficiency, responsiveness and convenience of our customer service and thus enhance customer satisfaction

#### Recipients of your data

For the above-mentioned purposes, we may transfer your data to our messenger & chatbot service provider.

## 22. Using mobility products of our cooperation partners

#### Purposes of data processing

You can rent mobility products (e.g. e-scooters or mopeds) from cooperation partners (see below → Recipients of your data) via our app. For this purpose, we process your master data, communication data, contract data as well as your finance data to collect the rental price and we exchange personal data with the cooperation partner. For certain processing of your data in connection with the use of the mobility products, SIXT and the cooperation partner are jointly responsible (joint controllers). In this respect, we have determined our respective responsibilities for compliance with the obligations under data protection law. SIXT will provide you with the essence of the arrangements on request (for contact details see → Rights of data subjects).

#### Legal basis for processing

Art. 6 (1) sentence 1 point b) GDPR

#### Recipients of your data

We transmit data to TIER Mobility SE and MILES Mobility GmbH for the above-mentioned purpose. More detailed information on the activities of the cooperation partners can be found online at <https://www.tier.app/privacy-notice/> and <https://miles-mobility.com/en-de/data-protection>.

### 23. Cooperations with vehicle manufacturers

#### Purposes of data processing

SIXT carries out promotions with vehicle manufacturers from time to time. For example, you may be given the opportunity to test drive certain vehicle models or you may be able to use vehicles from certain manufacturers as part of our mobility offers. In these cases, SIXT will inform you of the cooperation partners before the promotion begins.

will typically pass on the following data to the cooperation partner: your name, your e-mail address, your telephone number, the place and the duration of the drive (data may vary depending on the promotion and will be shown separately with the respective promotion). If you have already registered with the SIXT cooperation partner, e.g. via an app, the cooperation partner may also use your identification number, which the cooperation partner has assigned to you as part of a registration, to identify you. The cooperation partner of SIXT can then contact you with your consent to ask you about your product experience. In addition, SIXT may use this data itself for direct marketing purposes.

In addition, SIXT occasionally develops so-called "white label products" such as websites and apps that are branded with the brand identity of a vehicle manufacturer. Vehicles of the respective manufacturer can be rented from SIXT via these "white label products". The processing of personal data in the context of such "white label products" is carried out by SIXT for the purpose of fulfilment of the contract. Provided you have given your consent, we may pass on your personal data to the vehicle manufacturer. The processing of personal data by the vehicle manufacturer is subject to their privacy policy, which is usually available on their website, unless it is already provided in the "white label product". In the context of such cooperations, marketing measures may also be carried out by SIXT or the cooperation partner, provided there is a suitable legal basis – such as your consent - for this.

#### Legal basis for processing

For data transfer to cooperation partners depending on the cooperation either Art. 6 para. 1 sentence 1 lit. a GDPR (consent) Art. 6 para. 1 sentence 1 lit. b GDPR (fulfilment of a contract), otherwise Art. 6 para. 1 lit. f GDPR (legitimate interests of SIXT).

### 24. Events and donations

#### Purposes of data processing

We organise a variety of different events to promote customer relations and customer loyalty. We also organise a number of charitable activities, such as appeals for donations. We process your master data and communication data for the aforementioned purposes.

#### Legal basis for processing

Art. 6 (1) sentence 1 point f) GDPR

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.

### 25. Access records

#### Purposes of data processing

When you access our websites, we process the data that your browser transmits in order to enable you to visit the websites. This is a technically necessary process in which data is transmitted (such as IP address, date and time of the request, operating system, browser type including language and version). The data is used to ensure stability and security, i.e. to control server capacities, to find and eliminate errors and to defend against as well as to analyze attacks or security incidents. For this purpose, the data is processed for a limited period of time in so-called protocols or log files and deleted or anonymized after analysis. In the case of anonymization, the data is modified in such a way that information relating to identified or identifiable persons can no longer be attributed to a person or can only be attributed



to a person with a disproportionate expenditure of time, cost and manpower.

#### Legal basis for processing

Art. 6 (1) sentence 1 point f) GDPR

Our legitimate interest in processing your personal or personally identifiable information is, as just mentioned, to ensure the stability and security of our websites.

## 26. Cookies and similar technologies

#### Purposes of data processing

Our websites use cookies and similar technologies. Cookies are small text files that are copied from a web server onto your device and assigned to the browser you are using, so that certain information can flow to the entity that sets the cookie. Cookies cannot execute any programmes or infect your computer with viruses.

Further information on the cookies and similar technologies we use, their functions and lifespan as well as the data processed in this context can be found in the second layer of our cookie banner, which is automatically displayed when you access the website for the first time, and otherwise at any time via the "Cookie settings" link in the footer of the website.

For more information on the assertion of your right to access in accordance with Art. 15 GDPR with regard to personal data processed in connection with the use of our websites, please refer to section "K: Rights of data subjects" (see → [Right of access by the data subject, Art. 15 GDPR](#)).

#### Legal basis for the processing

The legal basis for these data processing operations can be found in Art. 6 para. 1 p. 1 lit. a) (for cookies that are not strictly necessary for us to provide a service you have explicitly requested) and f) GDPR (for cookies that are strictly necessary for us to provide a service you have explicitly requested), if processing of personal data is performed.

Our legitimate interests in processing your personal data via our websites lie in our desire to optimize our internet offering and, as such, offer our customers best possible services and sustainably increase customer satisfaction.

## E: Sources of your data

Generally, we collect your data directly from you. In the following cases, however, we may receive your master, communication and contract data and, if applicable, financial data from the following third parties if they make a reservation for you:

- Travel agencies, price comparison portals or other travel intermediaries
- Your employer or your employer's travel manager
- Road assistance service providers

For credit check purposes, we may also request information from credit agencies (see → Credit check and data transmission to credit agencies).

## F: Categories of recipients of your data

We sometimes draw on the services of external service providers and companies belonging to the SIXT Group to fulfil our contractual and statutory obligations and to fulfil our legitimate interests.

We may also transfer your personal data to other recipients such as public authorities, e.g. for statutory disclosure requirements to tax authorities and prosecuting authorities or to fining authorities for administrative offences, to credit institutions, e.g. to handle payments, to companies for parking management, to experts, e.g. to manage claims, or to lawyers, e.g. to defend and assert legal claims.

## G: Transfer to third countries

If you use our services to reserve vehicles that are to be rented in a third country, we transmit your personal data and the data of any additional drivers to our business partners in such third country. This also applies if you use partner programmes from third countries. In cases of damage and/or accidents suffered in a third country, we may send your personal data and data of any additional drivers to the competent authorities and to insurance companies in such third country.

The transfer of your 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 Art. 46 (2) GDPR. You can request copies of the aforementioned safeguards from SIXT by writing to the address specified above (cf. → A: Data controller, contact details ). 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.

In addition, some recipients of your personal data based in the USA are certified under the Data Privacy Framework ("DPF"). For such

recipients, there is a restricted adequacy decision of the European Commission for certain data categories. To the extent of the valid DPF certification of the data recipient, the transfer of personal data is based on this adequacy decision.

#### **H: Duration of storage/Criteria for determining the period**

SIXT retains your personal data for as long as necessary to achieve the finality of the processing for which it was collected or processed (see D purpose of data processing). Your SIXT account will be deleted if you do not use it to rent a vehicle for a period of six years. We perform such deletions once a year.

Where SIXT is required by law to retain personal data, it will be retained for the duration of the period required by law. Data collected for contractual reasons (1. Vehicle Reservation and Rental; 3. Damages, Accidents, Contraventions; 4. Treatment due under legal regulations) are retained for a maximum of 10 years.

In some cases, your personal data are saved for current practices and only for that period if there is no other reason for their processing. The legal basis for the data processing can be found in Art. 6 co. 1, first sentence (c) of the GDPR along with the current reference legislation that determines the retention periods for documents.

#### **I: Automated decision-making**

The aforementioned data processing does not include any automated decision-making pursuant to Art. 22 GDPR.

#### **J: Profiling**

We sometimes process your data in an automated way with the aim of evaluating certain personal aspects (profiling). We use profiling in the following cases:

- We evaluate data by means of what are known as connected vehicle functionalities in order for us to be able to maintain, care for and organise our fleet of vehicles. These measures are also intended to protect you (cf. → D: The purposes of data processing at SIXT, No. 8).
- We perform analyses of potential to improve the quality of our processes and offers and to optimise our customer relations. To this end, our customers are grouped according to certain criteria, such as order history, sales revenue and claims statistics (cf. → D: The purposes of data processing at SIXT, No. 18) .
- We implement different measures to enable us to provide you with targeted information and advice about products. These make it possible to pursue appropriate advertising activities including market research and surveys (cf. → D: The purposes of data processing at SIXT, No. 11) .

#### **K: Rights of data subjects**

You can assert the rights mentioned below. Your requests to assert data protection rights and our responses to them will be stored for documentation purposes for a period of three years and in individual cases longer for the establishment, exercise or defense of legal claims.

Legal basis for the above processing

Art. 6 (1) sentence 1 point f) GDPR

Our legitimate interest is protecting against claims or fines under Art. 82, 83 GDPR and fulfilling our accountability obligations under Art. 5 GDPR.

##### **1. Right of access by the data subject, Art. 15 GDPR**

You have the right to, at reasonable intervals, obtain information about your personal data under storage. The information you are entitled to includes information about whether or not SIXT has stored personal data concerning you, about the categories of personal data concerned, and about the purposes of the processing. Upon request, SIXT will provide you with a copy of the personal data that are processed.

If you wish that, as part of providing information about your personal data under storage, we also provide information about data collected through cookies or similar technologies when using our websites, we kindly ask you to provide us with your cookie IDs. You can find these in your browser, e.g. by opening the Developer Tools, selecting the "Console" tab, then entering the command "document.cookie" and confirming by pressing the Enter key. The cookie IDs will then be displayed.

##### **2. Right to rectification, Art. 16 GDPR**

You also have the right to obtain from SIXT the rectification of inaccurate personal data concerning you or to have incomplete data completed.

### 3. Right to erasure, Art. 17 GDPR

You furthermore have the right to obtain from SIXT the erasure of personal data concerning you. 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, or if the personal data have been processed unlawfully.

### 4. Right to restriction of processing, Art. 18 GDPR

Under certain circumstances, you have the right to have the processing of your personal data restricted. 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 your personal data, with the exception of storage, until the matter has been clarified.

### 5. Right to data portability, Art. 20 GDPR

Should you opt to change to a different vehicle rental company, you have the right either to receive, in a machine-readable format, the 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 data to a third party of your choice.

### 6. Right to object, Art. 21 GDPR

#### a) Right to object in certain cases.

If the processing of your data by SIXT 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 (Art. 6 (1) sentence 1 point e) GDPR) or is based on the legitimate interests of SIXT (Art. 6 (1) sentence 1 point f) GDPR), then you have the right to object at any time, on grounds relating to your particular situation, to the processing of your data. This also applies to any profiling based on this provision as defined by Art. 4 no. 4 GDPR, which we use for what are referred to as connected vehicle functionalities, for improving our processes and offerings or for advertising purposes. We will then end the processing, unless we can present compelling legitimate grounds for such processing that supersede the grounds for ending the processing.

#### b) Right to object against the processing of data for the purposes of direct marketing (as defined by section D, no. 11 of this Privacy Policy)

In individual cases, we process your personal data for direct marketing purposes. You have the right to object to your personal data being processed for the purposes of such marketing activities; this also applies to profiling to the extent that it is associated with such direct marketing.

**If you object to your data being processed for direct marketing purposes, we will no longer process your personal data in this way.**

**You may exercise your right to object without the need to adhere to a particular format and direct it to:**

**Sixt rent a car S.r.l., via Bolzano 63, 39057, Appiano sulla strada del Vino (BZ)**

**or to the e-mail address: [dataprotection@sixt.com](mailto:dataprotection@sixt.com)**

### 7. Right to withdraw, Art. 7 (3) GDPR

If data processing at SIXT is based 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.

### 8. Contact information to exercise the rights of data subjects

If you wish to exercise your rights as a data subject, please direct such requests to the e-mail address: [dataprotection@sixt.com](mailto:dataprotection@sixt.com).

### 9. Right to lodge a complaint ( art. 77 GDPR e artt. da 140-bis a 143 del D.lgs 196/2003)

You have the right to lodge a complaint with a supervisory authority (Art.77 GDPR). You can exercise this right before a supervisory authority in the Member State in which you are resident, where your place of work is or the place where the suspected infringement is committed.

In Italy, where Sixt rent a car S.r.l. is based, the competent supervisory authority "Garante per la protezione dei dati personali" can be found at the following address:

**-brought by registered mail brevi manu or A/R addressed to: Garante per la protezione dei dati personali, Piazza Venezia, 11 - 00187 Roma**

- certified mail email (deliverable only if sent from a certified mail address): [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it)

To check the most up-to-date ways of sending a complaint to the Garante and for any doubts about how to submit a complaint to the Garante authority in Italy below is the authority's website: <https://www.garanteprivacy.it/>

**General information**

We reserve the right to amend and adapt this Privacy Policy with effect for the future.

Current version: Agosto 2024

## Appendix: Companies

Sixt GmbH & Co. Autovermietung carries out the marketing and direct advertising measures described in the Privacy Policy for itself and for the following companies:

- |  |                 |
|--|-----------------|
| • Sixt Ride GmbH & Co. KG                                  | Germany         |
| • Sixt B.V.  | The Netherlands |
| • Sixt Belgium BV  | Belgium         |
| • SIXT S.à.r.l.  | Luxemburg       |
| • SIXT RENT A CAR S.L                                      | Spain           |
| • Sixt rent-a-car AG                                       | Switzerland     |
| • Sixt G.m.b.H.  | Austria         |
| • Sixt rent a car Srl                                      | Italy           |
| • Sixt rent a car Ltd.                                     | United Kingdom  |
| • Sixt Rent A Car LLC                                      | USA             |
| • SIXT franchisees and SIXT cooperating national companies | worldwide       |