

Privacy Policy

Video Surveillance and similar technologies

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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 and SIXT buildings/properties in connection with video surveillance and similar technologies. Please note that for other data processing activities (e.g. in our app or for our rental business) 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: Controller, contact information for data protection officer

The party responsible for the processing of your data ("controller") is the entity named on the respective information sign (e.g. a sign with a camera pictogram on the outside of the building or in the entrance area) as the data controller (hereinafter also referred to as SIXT).

If you have any questions regarding data protection, please address your query to the following email address: dataprotection@sixt.com.

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

B: Categories of personal data

The following categories of personal data may be processed by us:

- **Photo/Video recordings:** Photo/video recordings of persons within the detection range of cameras
- **Vehicle Data:** e.g. vehicle identification number (VIN), model, manufacturer, license plate number
- **Contract Data:** e.g. rental information (reservation number, rental agreement number, vehicle category, pick-up and return date, pick-up and return branch, booked extras/services, ...)

C: The legal basis for data processing

Art. 6 (1) sentence 1 point b) of the General Data Protection Regulation ("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 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.

D: The purposes of data processing

1. Video Surveillance

Purposes of data processing

At some SIXT branches or other SIXT buildings/properties, we use video surveillance systems. Here we process photo/video recordings.

The processing of your personal data in the context of video surveillance is carried out for the following purposes:

- Exercise of domiciliary rights
- Prevention and investigation of criminal offenses
- Preservation of evidence
- Protection of life, limb and property

Legal basis for the above processing

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

Our legitimate interest in processing your personal data for the aforementioned purposes lies in the exercise of domiciliary rights, the protection of life and limb, in particular of our employees, the protection of our property, in particular our vehicles and buildings, and the preservation of evidence and the prevention and investigation of criminal offenses.

Storage period or criteria for determining the storage period

Video recordings are deleted (overwritten) after a standard period of 72 hours. If a longer storage period is required, e.g. if it is necessary to extend the period to preserve evidence or to investigate a specific criminal offence, this data will be deleted immediately as soon as it is no longer needed for such purposes. For selected locations or areas (e.g. security areas), the storage period may be longer. In such cases, the applicable storage period is indicated on the respective information sign.

Recipients or categories of recipients of your data

SIXT may transfer your personal data to companies of the SIXT group. Providers of video surveillance systems may also have access to this data.

In addition, SIXT may transfer your personal data to the competent investigating authorities if this is necessary for the investigation of criminal offences or for the preservation of evidence.

2. License Plate Recognition

Purposes of data processing

At some SIXT branches or other SIXT buildings/properties, we use license plate recognition systems. Here we process photo/video recordings and vehicle data.

The processing of your personal data in the context of license plate recognition is carried out for the following purposes:

- To allow vehicles a convenient entry and exit to/from SIXT branches or other SIXT buildings/properties
- For correct invoicing by capturing the exact pick-up and drop-off times
- To increase efficiency, legal certainty and customer satisfaction

Legal basis for the above processing

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

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

Our legitimate interest in processing your personal data for the aforementioned purposes lies in enabling a convenient entry and exit to/from SIXT branches or other SIXT buildings/properties, increasing efficiency, legal certainty and customer satisfaction and enabling correct invoicing and thus contract fulfillment.

Storage period or criteria for determining the storage period

In general, the data is deleted as soon as the purposes for which they were collected no longer apply or statutory retention obligations that we are subject to have expired. At buildings/properties used jointly with third parties, we take additional technical and organizational measures to ensure that the processing of license plates that do not belong to SIXT vehicles is carried out with the least possible intensity and that the storage period is reduced to a minimum. For example, the data is deleted immediately after collection.

Recipients or categories of recipients of your data

SIXT may transfer your personal data to companies of the SIXT group. In addition, service providers/providers of license plate recognition systems may have access to this data.

3. Automated Damage Detection

Purposes of data processing

At some SIXT branches, we use automated damage detection systems equipped with multiple cameras. 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 the above processing

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

Our legitimate interest in processing your personal data for the aforementioned purposes lies in increasing 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, for example 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 already existed before the customer used it.

Storage period or criteria for determining the storage period

In general, the data is deleted as soon as the purposes for which they were collected no longer apply or statutory retention obligations that we are subject to have expired. We take technical and organizational measures to ensure that only data of SIXT vehicles are stored and further processed.

Recipients or categories of recipients of your data

SIXT may transfer your personal data to companies of the SIXT group. In addition, service providers/providers of systems for automated damage detection may have access to this data.

4. Automated Queue Analysis

Purposes of data processing

At some SIXT branches or other SIXT buildings/properties, we use systems for automated queue analysis. Here we process photo/video recordings

As part of the automated queue analysis, photo/video recordings are captured in the first step, but are not stored or further processed in a person-related manner. The used system anonymizes and evaluates the live photo/video material in real time, so that only metadata (e.g. length of the queue, number of people waiting and waiting times) without any personal reference is further processed.

The processing of your personal data in the context of automated queue analysis is carried out for the following purposes:

- Improving service quality
- Increasing efficiency and customer satisfaction

Legal basis for the above processing

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

Our legitimate interest in processing your personal data for the aforementioned purposes lies in increasing service quality, efficiency and customer satisfaction, e.g. by optimally staffing the branches and counters.

Storage period or criteria for determining the storage period

The used system anonymizes and evaluates the live photo/video material in real time, so that only metadata without personal reference is further processed. Therefore, no storage of personal data takes place.

Recipients or categories of recipients of your data

SIXT may transfer your personal data to companies within the SIXT group. In addition, service providers/providers of queue analysis systems may have access to this data.

E: Rights of the data subject

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, for the assertion, exercise or defense of legal claims even longer.

Legal basis for the above processing

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

Our legitimate interest is to protect ourselves against claims or fines under Art. 82, 83 GDPR and to fulfill 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 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.

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 object, Art. 21 GDPR

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.

You may exercise your right to object without the need to adhere to a particular format and direct it to the entity mentioned on the information signs or to the e-mail address: dataprotection@sixt.com

6. 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

7. 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

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.

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