



Privacy Policy
25th May 2018

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1. Who processes your personal data?

Europcar Group UK Limited whose registered office is located at James House, 55 Welford Road, Leicester, Leicestershire LE2 7AR UK (hereinafter referred to as (“we”, “us”, “our(s)”) is responsible for the processing of your personal data (i.e. any information that would allow us to identify you, either directly or indirectly) collected through our website, our rental stations, or through other contact you may have with us.

2. For what purposes do we collect your personal data?

We collect and use personal data that you voluntarily provide to us for some or all of the following purposes:

- a. Your registration as a Europcar member including creation of your account and providing you with a driver ID.

This processing is necessary to identify you and to prepare and facilitate your future bookings and rentals with us.

- b. The booking and the management of your vehicle rental:

- i. to confirm your booking;
- ii. to modify or cancel your booking;
- iii. to correspond with you in relation to your booking or rental (e.g. to provide you with information on your booking or rental, to send you reminder notices before your check-in / check-out times; to respond to your questions or suggestions);
- iv. to manage your rental (including delivery and return of the vehicle);
- v. to manage your invoices;
- vi. to manage any payment of arrears;
- vii. to manage any disputes;
- viii. to manage the recovery of or damage to our vehicles;
- ix. to manage your insurance.

This processing is necessary for the performance of any rental agreement that is concluded between you and us.

- c. Payment purposes

This processing is necessary to enable us to take payment for the services we provide to you and to pay any additional charges or fines you may incur as a result of using our services. We will retain your credit card information according to our retention policy set out in section 4 of this Privacy Policy.

- d. The monitoring of our vehicles based on the rental of “connected” vehicles and geolocalisation systems. This may include:

- i. monitoring the state, performance and functionalities of our vehicles;
- ii. anticipating and identifying potential infringements;
- iii. supporting our fight against criminal activities including theft and fraud.

This processing, for the purpose of protecting the integrity of our fleet, is based on our legitimate interests.

- e. Improvement of our products and services on the basis of:

- i. customer surveys or questionnaires you have completed or taken part in;
- ii. the recording of your rental history to suggest pre-selected options when looking for new bookings or rentals.

This processing, for the purpose of obtaining a better understanding of your needs and offering you customized functions to enhance your experience of our products and services, is based on our legitimate interest.

- f. The operation of our live web chat to provide you with online assistance when making your booking or reservation and any associated online services.

This processing, based on our legitimate interest, allows us to personalise our services for you and improve the service we offer you notably through answering your queries in a timely manner.

- g. Promotional and marketing activities, namely:

- i. the sending of email and SMS notifications for special promotions or deals that may be relevant for you ;
- ii. the sending of our newsletters;
- iii. the sending of emails about a booking you did not complete or sending you a summary about a booking enquiry;
- iv. the management of any loyalty program and provision of a membership card;
- v. the organization of promotional contests or sweepstakes;
- vi. the management and updating of our customer or prospects database.

When you give us permission to do so we will process your information for direct marketing purposes, i.e. any commercial message from us aiming at promoting our products and/ services, are subject to your express consent.

By exception, if you are already an existing customer and the message concerns products and/or services similar to those you have already purchased, the underlying processing will not be based on your consent but on our legitimate interest.

- vii. We may also work with reputable third parties to offer our members, customers and website visitors a variety of travel services and loyalty programs. Further details of our partners in such travel services and loyalty programs can be obtained from our customer services department at customerservicesuk@europcar.com.

h. The management of fines, in particular:

- i. to transfer information to the police or other enforcement agencies or issuing authorities to enable them to identify the driver of our vehicle (or potential driver) in the event of a driving offence or suspected driving offence;
- ii. to transfer information to public or private enforcement agencies for the purpose of addressing Parking Notifications and associated fines.

This processing is required by law or carried out to support our legitimate interests.

i. The management and update of a register of customers (the 'Watchlist') presenting certain contractual risks based on:

- i. payment incidents which have given rise to legal proceedings;
- ii. accidents involving our vehicles or repeated damage caused by a customer;
- iii. accidents or damage caused voluntarily by a customer;
- iv. use of our vehicles in breach of the general terms and conditions that apply to the rental of our vehicles.

This processing is based on our legitimate interest and aims to reduce our financial exposure in the performance of the rental agreements.

j. Cookies Policy

We carry out certain processing of your personal information through "cookies" and other tracers collected every time you visit our website. You can accept or reject these cookies and other tracers by following the instructions provided in our Cookies Policy.

This processing is governed by our Cookies Policy, which we encourage you to review and which you can find at the following address <https://www.europcar.co.uk/security-and-privacy-policy>.

3. Who are the recipients of the personal information we collect about you?

a. **Categories of recipient**

Your personal data will be disclosed, as necessary or relevant:

- i. to authorised personnel within our company and to entities in our group and/or to entities in our group franchise network, or any person appointed by any of these entities for the purposes of fulfilling your rental booking and supplying associated services;
- ii. to third party IT service providers (including Cap Gemini, Sopra Steria, Unisys, Salesforce, Google) for technical purposes in order to help us provide you with our products and services.
- iii. to law enforcement bodies and other public and private sector bodies for the purposes of dealing with fines; and private parking companies dealing with breaches of contract;
- iv. for the management and update of a register of customers presenting certain contractual risks to us. This register is managed by our trade association 'British Vehicle Rental and Licensing Association (BVRLA)'. More details can be found at www.bvrla.co.uk
- v. companies supplying operational support in relation to:
 - A. delivery and collection of vehicles;
 - B. authentication of you and your driving licence history (including, but not limited to, Experian and the DVLA);
 - C. insurers and solicitors that manage our insurance claims and/or debt recovery matters;

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

b. **International transfers**

We will, to the extent necessary to provide you with our services and for the purposes set out here, transfer your personal data outside the EU. For example if you book to hire a vehicle in a country that is outside of the EU we will need to provide your information to a third party (such as a franchisee) in the relevant country in order to fulfil the booking.

Depending on the circumstances, certain third party recipients may be located in countries which have, or have not, been recognized by the European Commission as ensuring an adequate level of data protection. In the event your destination country is not recognized by the European Commission as having adequate levels of data protection you should be assured that we have put in place the appropriate safeguards to ensure that your personal data is protected in accordance with the requirements of EU regulation 2016/679.

4. For what period will we retain your personal data?

Your personal data is retained for different periods depending on the purpose of the processing:

Purpose	Retention period
Your registration as a Europcar member, the creation of your account and the provision of your Europcar Driver ID	For the duration of the commercial relationship.
Your booking and your car rental	Information that may evidence a right or a rental agreement, or information that must be kept in compliance with a legal requirement will be retained in accordance with applicable legal provisions and for a period that does not exceed the time that is necessary for the purposes for which it is retained.
Payment	Upon effective completion of the payment.
Payment card information	Payment card information (excluding the visual cryptogram): <ul style="list-style-type: none"> • that may evidence a payment (i.e. card number and date of validity) will be retained for a period of 13 months following the effective date of any relevant payment made from the credit card and will be used only if the transaction is disputed; • can be retained for a longer period, subject to your express consent, to facilitate future payments. When the payment card is expired related information will, in any event, be deleted.
Promotional and marketing activities	<ul style="list-style-type: none"> • For our existing customers, 3 years following the end of your relationship with us • For people who are not our existing customers - 3 years as from the date we collected your personal information OR from the date of your last request to us for information
Cookies	Please check our Cookies Policy at https://www.europcar.co.uk/security-and-privacy-policy
Monitoring of our vehicles based on the rental of “connected” vehicles and geolocalisation systems	This information is held in an anonymised format by a third party processor for an indefinite period. We will access this information to obtain details relating to a specific vehicle at a particular point in time for our lawful purposes. This information will not usually be accessed more than 12 months after the date on which the information was recorded.
Payment of fines	For the time necessary to identify the driver (or the potential driver) liable for the offence leading to the fine. Relevant information can be retained for a period of up to 12 months after receipt of the fine subject to our intermediate archiving policy.
The management and update of an internal register (“Watchlist”) of customers presenting certain contractual risks, namely:	
i. payment incidents which have given rise to legal proceedings	until the debt is cleared
ii. theft of a vehicle	permanently
iii. vehicle accidents or repeated damage caused by you	3 years from the occurrence of the event
iv. accidents or damages caused voluntarily by you	3 years from the occurrence of the event
v. abusive behaviour towards our employees or agents	permanently

5. What rights can you exercise with respect to the processing of your personal data?

- a. At any time, you can view and/or update your personal profile through the “My Europcar” link, accessible through the main navigation bar of our website. Your personal profile includes your membership registration, driver information and car rental preferences information. You can change your password, secret question, update or correct phone number, address, email, and driving licence information and update your car rental and travel preferences including insurance, means of payment and frequent traveler membership.
- b. Under EU regulation 2016/679, you can also benefit from the following rights:
 - i. right of “**access**”: is your right to obtain confirmation as to whether or not your personal data are being processed by us, and, where that is the case, to access these personal data and to obtain further information on the characteristics of their processing ¹;
 - ii. right “**to rectification**”: is your right to obtain the rectification of inaccurate personal data or, taking into account the purposes of the processing, the right to have incomplete personal data completed, including by means of providing a supplementary statement;
 - iii. right to “**erasure**” (or the so-called “right to be forgotten”): is your right to obtain the erasure of your personal data in certain circumstances ²;

- iv. right to **“object”**: is your right, at any time, to object to the processing of your personal data and to prevent us from continuing to carry out such processing where:
 - A. your personal data are processed for direct marketing purposes;
 - B. your personal data are processed on the basis of our legitimate interest. In that case, your request will be satisfied if you can provide us with a description of the particular situation legitimising your request unless we can demonstrate overriding legitimate grounds in light of your particular situation.
- v. right to **“withdraw your consent”**: where the processing of your personal data is based on your consent, you have a right to withdraw your consent to the processing of your personal data at any time and to prevent us from continuing to carry out such processing;

If you wish to exercise any of these rights, please contact the Director of Legal Services as set out in section 6.b below. In addition, our promotional and marketing emails and other communications also include instructions on how to unsubscribe.

To protect your privacy and security we will take reasonable steps to verify your identity before granting access or making corrections. In accordance with article 77 of the EU regulation 2016/679, you can lodge a complaint about the processing of your personal data with the body regulating data protection in your country³ if you consider that the processing of your personal data infringes the said EU regulation 2016/679. In the UK this is the Information Commissioner at <https://ico.org.uk/>.

6. Who to contact when you have a query regarding the processing of your personal data?

Depending on the purpose of your query, you should contact one of the following:

- a. For general queries regarding the processing of personal data carried out by Europcar Group UK Limited: Your query should be marked for the attention of the Director of Legal Services at Europcar Group UK Limited, James House, 55 Welford Road, Leicester LE2 7AR or by email to the Director of Legal Services at _uk-legal@europcar.com.
- b. To exercise your rights (access, rectification, erasure, restriction, etc.): Your communication should be marked for the attention of the Director of Legal Services at Europcar Group UK Limited, James House, 55 Welford Road, Leicester LE2 7AR or by email to the Director of Legal Services at _uk-legal@europcar.com.

7. How do we protect your personal data?

We are committed to protecting the information we collect from you.

In particular, we use appropriate physical, technical and organizational security measures to prevent unauthorized or unlawful processing, accidental loss, or destruction of or damage to your personal data.

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

Any credit card transaction you make through our websites is done through our Secure Server Technology. This technology notably:

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

8. What rules apply to the processing of your personal data when clicking on links placed on our website which direct you to our partner’s websites or other websites?

You may find various links to our partner’s websites or other third party websites (e.g. for travel services) on our website.

PLEASE NOTE: this privacy policy does not apply to any processing of your personal data that is carried out by our partners or any other third parties when you visit their respective websites and we are not responsible for such processing.

We encourage you to review the privacy policies of our partners and other third parties to further understand the rules that will apply to the processing by them of your personal data.

9. Changes to this Privacy Policy

This privacy policy was published on Friday 25 May 2018. If we make any changes to this privacy policy we will identify such changes on our website.

¹ Regarding the purposes of the processing, the categories of personal data concerned, the categories of recipients, whether these data are transferred to third countries and appropriate safeguards put in place (if any), the storage period, the existence of any automated decision-making based on these data, the right to lodge a complaint with the relevant data protection authority, the existence of other data subjects' rights (rectification, erasure, restriction).

² Where data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, you withdraw your consent and there is no other legal ground for the processing, you object to the processing of your personal data and there are no overriding legitimate grounds, it is demonstrated that your personal data have been unlawfully processed, to comply with a legal obligation.

³ The country where you have your habitual residence, place of work or place of the alleged infringement.