

PRIVACY POLICY

We inform you, under art. 13 Regulation UE n. 2016/679 (hereinafter "GDPR") that Locauto Rent S.p.A. (hereinafter "Locauto" or "Owner") will proceed in processing the provided data given in compliance with current legislation and according to what follows.

1. PROCESSING OBJECT

The Owner processes the identification personal data (for example, name, surname, business name, address, telephone number, e-mail, bank and payment references) – as a result, "personal data" or also "data") communicated at the issuance of the rental contract.

2. PROCESSING PURPOSE

Your data are processed:

Without explicit consent according with art. 6 b), e), f) GDPR, for the following purposes:

- (a) access and usage of Locauto rental services, including collection, preservation and elaboration of data relevant to the establishment and the following operation management, technical and administrative of the relationship and execution of communications related to the services executions;
- (b) execution of obligations derived from the General Rental Conditions;
- (c) management of payments (with related processing compliance with law of payment data, including credit cards and/or prepaid cards identification details);
- (d) fulfilment of legal, accounting, fiscal, administrative and contractual obligations linked to the required services execution;
- (e) management of the relations with authorities and third parties public entities for purposes linked to particular requests, execution of law obligations or to particular procedures (e.g.: reassignment to the actual violator of the reports of violations of the rules of the Highway Code);
- (f) claim management;
- (g) arrangement of actions finalized to protect against credit risk, including activities finalized in identifying customer and economic/solvency reliability, also during the contractual relation. A missing, incomplete or untrue communication of necessary data for the subscription involves the impossibility of the completion of it and the consequent impossibility to use the service;
- (h) exercise of the Owner rights, for example the right to defense in court;
- (i) for legitimate interest in carrying out direct marketing and to detect the satisfaction level on the quality of services provided.

Communications referred to the previous points (i) could be sent via ordinary way (e.g. mail, telephone calls with the operator), or automated (e.g. telephone calls without operator) and similar (e.g. fax, e-mail, SMS, MMS), as per data provided in the occasion of the conclusion of the rental contract.

Only with your specific and clear consent (art. 7 GDPR):

- (k) sending from Locauto Rent, of parent companies, controlled and linked, of newsletter, commercial communications and/or advertising material on products or services provided by any entity different than the holder;
 - (l) conduction of market analysis and surveys in order to check the satisfaction level on the quality of services.
- Communications referred to the previous points could be sent in ordinary way (e.g. mail, telephone calls with the operator), or automated (e.g. telephone calls without operator) and similar (e.g. fax, e-mail, SMS, MMS), as per data provided in the occasion of the conclusion of the rental contract.

3. PROCESSING MODALITY

Processing personal data is realized through operations indicated in art. 4 n. 2) GDPR and precisely: collection, registration, organization, preservation, consultation, elaboration, modification, selection, extraction, comparison, use, interconnection, block, communication, cancellation and destruction of data. Your personal data are submitted to both ordinary and electronic/automated processing. The Owner will process the personal data for the necessary time in order to accomplish the above purposes and in any case for no longer than 10 years after the relation termination for Services Purposes and for no longer than 5 years from the collection of data for Marketing Purposes.

4. ACCESS TO DATA

Your data will be made accessible for purposes in art. 2), point a) a i) and, if allowed, from k) to l):

- to employees, collaborators, affiliates and franchisee of the Owner or of companies of Locauto Group, as internal responsables or processing and/or administrators of the system;
- to third parties companies or other entities (insurance companies responsible for accidents repayment; specialized companies in debt collection; specialized companies in the commercial information management or related to credit, or in advertising promotion; other companies contractually linked to Locauto Rent which conduct activities on accident management, subcontractors, subundertakers and/or financial intermediaries, professional firms which provide assistance

activities and consultancy towards our companies as well as banks, data processing centers, public entities, for the granting of contributions and aids of any kind linked to the provision of services) that provide activities on assignment and by order of the Owner, in their capacity as external responsables of processing.

Your data will be also made accessible for purposes of art. 2), from a) to i) and, if allowed, from k) to l):

- to EAN Data Services UK Ltd., Enterprise Holdings, Inc. and/or controlled or linked companies; such entities will process the data in their capacity as independent processing owner. We invite you, for further details, in consulting the EHI's Privacy Policy, including information on EHI's data retention policy, on the webpage <https://www.enterprise.co.uk/en/privacy-policy.html>

5. DATA COMMUNICATION

Without explicit consent (e.g. art. 6 b) and c) GDPR), the Owner will communicate your data for purposes art. 2) from a) to i) to: police, military and other public administrations, supervisory entities, judicial authorities, to insurances companies for supplying insurances services, as well as to those entities for who the communication is mandatory both for law and for the accomplishment of the above purposes. These entities will process these data in their capacity as independent processing owners. Your data won't be communicated.

6. DATA TRANSFER

Your personal data will be kept on servers situated on the infrastructure Microsoft Azure located in Ireland, inside the European Union. In any case the Owner, where necessary, will have the possibility to move the servers also extra-EU. In this case, the Owner reassure from now that the data transfer extra-EU will be done in accordance with the applicable legal provisions, prior stipulation of contractual standard clauses expected by the European Commission.

7. NATURE OF DATA SUPPLY AND CONSEQUENT REFUSAL TO REPLY

The contribution of data for purposes art. 2), from a) a i) it's mandatory. Without them, we could not guarantee our services of art. 2. point from a) to i). The contribution of data for purposes art. 2), da k) from l) is, indeed, optional. Hence you can decide to contribute data or subsequently refuse the possibility to process the already provided data.

8. GEOLOCATION, NAVIGATIONAL SYSTEMS AND INFOTAINMENT SYSTEMS

We inform you, also, that Locauto vehicles could be provided with geolocation systems. Geolocation under current legislation; data processing collected by third parties will be made in anonymous. Locauto won't collect nor process confidential data related to customers. Locauto vehicles could be provided with navigational system or infotainment system, these last ones directly and independently dealt by Locauto from the vehicles manufacturer. In the event of usage of navigational and infotainment systems, you will be deemed responsible for the entered information which you will need to remove from the used devices; failing that these data could be visible to the following vehicle user.

9. RIGHTS OF THE INTERESTED PARTY

In their capacity of interested party, has the rights of art. 15 GDPR and precisely the rights of:

- obtain the confirmation of the existence or non-existence of personal data which linked to you, even if not recorded yet, and their communication in intelligible form;

- obtain the indication of:

a) source of personal data;

b) of the purposes and processing modality;

c) of the applied logic in case of processing made with the aid of electronic tools;

d) from the Owner identification details, of responsables and representative appointed under art. 3, point 1, GDPR; e) entities or categories of entities to which data could be communicated or could be informed in capacity of appointed representative in the State territory, responsables or appointed;

- obtain:

a) the update, the correction and, when there is interest, the data integration;

b) the cancellation, the transformation in anonymous or the blocking of data processing violation of the law, including the ones for which it is not necessary the preservation in relation to the purposes for which data have been collected or successively processed;

c) the attestation that the operations of point a) and b) have been disclosed, also concerning its content, the ones to which data have been communicated or spread, except the case that the fulfilment is impossible or means an excessive use respect to the protected right;

- oppose, in whole or in part:

a) for legitimate reasons of the personal processing data which concern you, although linked to collection;

b) to the personal processing data which concern you for sending advertising material or for direct sell or to accomplish market researches or for commercial communications, throughout automated tools for telephone calls without an operator action through e-mail and/or through traditional marketing modality through telephone and/or ordinary e-mail.

We remind you that the right of opposition of the interested party, indicated in the above point b), for direct marketing purposes through automated modality which extends to the traditional ones and in any case remain safe the possibility for the interested party to exercise the opposition right also in part. Therefore, the interested party can decide to receive only communications throughout traditional modality hence only automated communications or none of the two communications



type. Where applicable, you also have the rights in art. 16-21 GDPR (Rectification right, oblivion right, right to limit the processing, right to data portability, opposition right), as well as the right to claim to the Guarantor Authority.

10. MODALITY FOR RIGHTS EXERCISE

You will be able in any moment to exercise your rights sending:

- a registered mail a.r. a LOCAUTO RENT SPA – Operational Headquarter located in Milano, in Via Gustavo Fara, 39;
- an e-mail to privacy@locautorent.com

11. OWNER, RESPONSIBLE AND APPOINTEE

The data controller is Locauto Rent S.p.a (Tax Code / VAT 04367650969), with registered office in Piazza Silvio Pellico 5, 38122 Trento and operational headquarter in Via Gustavo Fara 39, 20124 Milan, tel. 02.430201; email: privacy@locautorent.com

The Data Controller has proceeded to designate, pursuant to art. 37 GDPR, a DPO (Data Protection Officer) who can be contacted for all questions concerning the processing and protection of personal data and the exercise of the rights of the interested party at the registered office of the Data Controller or by writing to privacy@locautorent.com

The updated list of data processors and appointees is kept at the registered office of the Data Controller.

12. PRIVACY POLICY AMENDMENTS AND UPDATES

This Privacy Policy version has been released on July 28, 2020. If the Data Controller wishes to change his information, he will proceed to inform the interested parties, making available an updated version.