

## PRIVACY POLICY AND DATA PROTECTION

The company respects the legal rules regarding the protection of personal data of its customers / suppliers, and of its employees, in accordance with the Regulation (EU) 016/679 of the European Parliament and of the Council of 04/27/2016.

### **About us:**

Drivalia Portugal, S.A., NIPC 502766883, Company belonging to the financial group CA Auto Bank, headquartered at Rua José Fonseca Carvalho, 9 2685-869 Prior Velho is the entity responsible for the treatment of your personal data.

This privacy policy does not apply to our licensed and self-managed agents.

### **What is personal data:**

Personal data refers to any information relating to an identified or identifiable person, such as personal addresses, e-mail address, unique identification number.

### **Legal framework**

The processing of data is permissible where it is necessary for the execution of a contract in which the data subject is party, or for pre-contractual procedures at the request of the data subject, or for the fulfillment of a legal obligation to which the person responsible for the data treatment is subject.

### **How and what data we collect:**

Drivalia Portugal, S.A., collects the personal data provided by you and essential to provide the products and services we propose or to fulfill legal obligations to which we are subject:

- Full name, tax address, current telephone number, e-mail address, driving license number, citizen / passport card number, tax number, date of birth and information regarding your credit card;
- Number and time of flights, address to the place of delivery or collection of the vehicle:
- Information about your commercial history, such as applied tariffs, type of vehicle normally requested, place of pick up and return of the vehicle, contract term, mileage and maintenance records;
- Other information that may be necessary in the scope and validity of the car rental contract (eg data collection in case of accidents);
- The collection of data can be done in person at the counter, by phone or email.
- Drivalia vehicles are equipped with satellite antitheft devices capable of geolocating the movement of the vehicle. Data processing by means of geolocation techniques is carried out by Drivalia to verify and control the location of the vehicle in case of theft, loss and/or embezzlement, to verify the fulfillment of contractual obligations (such as the obligation to use the vehicle within the portuguese territory and/or in case of failure to pay the rental fees), to protect rights in court, as well as to protect the company's assets (for example, in case of failure to return the vehicle on the agreed due date). The processing, as it is aimed at fleet management and protection, does not require consent as it is based on the legitimate interest of the Data Controller. In order to protect the safety of drivers in the event of an accident, the Data Controller shall process geolocation data, acquiring the elements useful to the reconstruction of any accidents reported

by you and/or the other party's insurance company, in order to locate and recover the rented vehicle and reconstruct the dynamics of any accident. For the purposes described above and in order to allow you to take advantage of the claims management services, monitoring of routes, mileage, assistance and operations centre in the event of theft and crash, as well as the stolen vehicle recovery service, Drivalia will use the support of third party companies, which provide services related to telematic devices, which will not in any case have access to personal data of customers and will operate according to the instructions given by the Owner, reported in the act of appointment as external data processor. Moreover, in order to prevent the risk relating to the occurrence of the aforementioned events, the aforementioned companies may also provide Drivalia with information, obtained from their systems, that includes geofencing, timefencing, driving style, type of routes taken and combinations of the aforementioned information with telematic data.

The data collected may include, by way of example but not limited to, vehicle identification data (number plate and/or VIN, model, registration date), GPS coordinates, and information relating to the position of the vehicle in use.

Geolocation data shall be retained for 12 (twelve) months from the date on which they are collected, without prejudice to special needs for further retention related to specific requests related to the filing of complaints/appeals and/or investigative needs of the Judicial Authority or the Judicial Police. At the end of the retention period, the data will be permanently deleted, in such a way as to make them nonreusable.

## **What is the purpose of data collection?**

The company collects, registers, consults and conserves the data provided by its clients for execution of the contractual relationship and billing of the services rendered.

The data provided will be processed by computer and non-computer means and used, exclusively, to the competent entities (addressees), for:

- The execution of the reservation requests and legal obligations necessary to execute the rental agreement (during and after its validity);
- Respect legal requirements (eg billing, other accounting documents);
- Respect, in compliance with legal obligations, requests from law enforcement authorities and other responsible and legally based entities, arising from accidents, theft or damage to the vehicle, misconduct, or road crimes during the term of the lease;

Necessary documents, via email or telephone contact under the rental agreement, during and after its validity;

- Fulfillment of our legitimate business interests;
- Administrative management;
- Information, if requested, on the requests of administrative entities, namely National Road Safety Authority and Institute of Mobility and Transport, Aliens and Borders Service;
- Under your express consent, for communications, e-newsletters, marketing actions, satisfaction surveys;

- Under your express consent, to communicate to the Association of Driverless Car Hire Manufacturers ("ARAC"), for the purposes of inclusion in a database of defaulting customers.;

## **Security of your personal data**

Drivalia Portugal, S.A. took the necessary precautions, with the implementation of technical and organizational measures to protect your personal data (technical and human) and implemented adequate procedures for the safeguarding of personal data, their integrity and security.

All employees of the company, authorized to access personal data, are bound to the duty of confidentiality.

The personal data under the rental contract and other foreseen purposes are stored and used by the company, throughout the duration of the contractual relationship and even after the end of the contractual relationship, under the legal terms and until tax compliance inherent to the company's activity.

For the purposes of Marketing, and from obtaining your consent, if there is no commercial movement or any interaction of the, and with, the data holder, at the end of 24 months the data will be deleted, unless new consent of the holder.

## **What are your rights and choices?**

The client must notify the company, whenever there are changes in your personal data that affect the contractual relationship and post contract and or billing services.

You have the right to access personal data, correct, update and delete them. However, the latter (deletion of data) is not an absolute right as long as there are legal, legal or legitimate grounds for the retention of your personal data.

Identity will be carefully checked before permitting or executing any request.

You are also entitled at any time to withdraw your consent for the processing of data and opposition to direct marketing, as a right to complain to the supervisory authority.

## **Contacts**

Any subject regarding privacy, clarification or requests described above, should be sent to [gestao.dados@drivalia.com](mailto:gestao.dados@drivalia.com) or to Data Management, Rua José Fonseca Carvalho, nº 9, 2685-869 Prior Velho and will be clarified for any question or concern about how we treat and use your personal information.