

Privacy Policy

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A: Introduction

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 general processing of personal data in our SIXT branches in Spain, on the website www.sixt.es 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.

B: Data controller, contact details

The party responsible for the processing of your data (controller) is SIXT RENT A CAR S.L.U., with registered office at Carrer del Canal de Sant Jordi 29, local 2, Polígono Industrial de Son Oms, ES 07610 Palma de Mallorca (hereinafter also referred to as SIXT).

SIXT RENT A CAR, S.L.U. is a member of the SIXT Group. The term "Group" refers to the SIXT Group.

If you have any questions about SIXT's privacy policy or wish to contact our data protection officer, please send your correspondence to our address or email us at the following address: dataprotection@sixt.com

C: 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, etc.
- **Communication data:** telephone number, landline or mobile phone, 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).
- **Identification and image data:** driving licence details, identity card, passport, as well as the photos included in these documents, the selfie taken with the camera on your smartphone/tablet or the image obtained through video surveillance cameras.
- **Contract data:** Rental information (vehicle categories, pick-up and drop-off date, pick-up and return branch, booked extras/services, reservation and rental contract number), self-generated PIN and result of the credit check results.
- **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, flight number, 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, license 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).
- **Browsing data:** e.g., when using the website or app, we process data relating to cookies, IP address, date and time of the request, operating system, browser type, including language and version.
- **Voice, audiovisual or digital data:** e.g., we process your voice when you communicate with our Customer Service or your communications via telephone or chat.
- **Special categories of data:** in the event of an accident, traffic offences, damage to third parties and/ or the vehicle or similar incidents, we process data relating to the respective course of events and the damage incurred, as well as notifications from authorities and third parties. The 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.

D: 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.

E: 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 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 a), 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 licence are 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, identification data (ID card and driving licence 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 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 licence and matches the person on the identification documents, for the 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 licence 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 Section 384 of the Spanish Criminal Code, articles 10.3 and 11.1.b) of Royal Legislative Decree 6/2015, of 30 October, which approves the revised text of the Law on Traffic, Circulation of Motor Vehicles and Road

Safety and Royal Decree 933/2021, of 26 October, which establishes the obligations of documentary registration and information of natural or legal persons who carry out activities of accommodation and rental of motor 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. We will also transmit your data to the Authorities and State Security Forces and Corps in compliance with the obligations of documentary registration and information, as well as in response to requests made by them in accordance with the law.

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, identification 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 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).

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, as well as the documentary registration and reporting obligations of natural or legal persons engaged in motor vehicle rental activities.

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.

We will also pass on your personal data to the authorities and the State Security Forces and Bodies in compliance with the obligations of documentary registration and information, as well as in response to requests made by them in accordance with the law.

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 provide your data to the authorities and State Security Forces and Bodies when requested to do so, e.g., we process master data, communication data and contract data within the framework of communication and registration obligations with the authorities (based on article 25 of the Spanish Organic Law on Citizen Security 4/2015 of 30 March 2015 on the protection of public safety and the provisions of Royal Decree 933/2021 of 26 October establishing the documentary registration and information obligations of natural or legal persons engaged in the activities of accommodation and rental of motor vehicles).).

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 and data transmission to credit agencies).

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 under the Spanish Commercial Code, and applicable tax and money laundering regulations, have expired (normally between four and 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, authorities and State Security Forces and Bodies, SIXT group companies, agency partners, SIXT-franchise partners and other 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, SMS and / or push. A SIXT account with a validated identity and driver's license is required to do 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, identification 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

To execute the rental agreement for digital products (e.g. SIXT-share or similar), you must unlock our vehicles via the SIXT app. 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 fuelling, select the corresponding pump at a partner filling station in the SIXT App and start the refuelling 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 "Eli"), which we offer you as an intermediary in the SIXT App by Sixt GmbH & Co. Autovermietung KG. You can use this service conveniently in the SIXT App with your SIXT account and the payment method stored there. In this context, Sixt GmbH & Co. Autovermietung KG processes your master data, contract data, communication data and financial data as an independent controller. If you have any questions about data protection or wish to exercise your rights as a data subject, you can contact dataprotection@sixt.com at any time.

For the processing of personal data by "Eli", the data protection information of "Eli" 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, Sixt GmbH & Co. Autovermietung KG discloses your data to "Volkswagen Group Charging GmbH" ("Eli").

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 equipped with so-called telematics/connected vehicle functions. These enable us to receive various information about the vehicle (see → Categories of personal data) and send certain commands to the vehicle. Vehicle data and telematics data are

collected by SIXT or the respective vehicle manufacturer and are used by us both for the fulfilment of the contract and for the maintenance, care, organisation and protection of our vehicle fleet. In this context, we process your contractual data, vehicle data and telematics data.

We process telematics data when you use SIXT-share, for example to (un)lock and locate vehicles (see also → Performance of the rental agreement when renting via the SIXT app) and when you use SIXT+ to record the vehicle's mileage for billing purposes.

The maintenance, care and organisation of our vehicle fleet is supported by telematics data, as this allows us, for example, to be informed about scheduled maintenance intervals or the mileage levels that require a vehicle change.

To protect our vehicle fleet, we process telematics data (in particular, data on the location of vehicles) in specific cases where there is a reasonable suspicion of unlawful behaviour, for example, to locate vehicles in the event of misappropriation and theft (see also → Breach of contract or law). In addition, we may process telematics data to identify and reconstruct damage to vehicles.

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 via the vehicles independently and on their own responsibility, without SIXT having any influence on this data collection or access to the data. In such 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. Please also note that our vehicles usually operate in fleet mode, which means that the data protection settings you have configured, such as activating 'private mode', do not generally prevent the collection of telematics data.

Further information regarding the processing 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 b) GDPR (Necessary for the fulfilment of the contract in the case of SIXT-share)

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

Our legitimate interest in processing your personal data for the maintenance, care, organisation and protection of our fleet is the efficient management of our fleet and the protection of our vehicles against misuse and theft, as well as the provision of evidence when asserting, exercising or defending legal rights (e.g. in the event of damage to vehicles).

Recipients of your data

We disclose your data to the following recipients for the aforementioned purposes: IT services providers, and for certain markets and vehicle categories, we may work with third-party geolocation service providers to prevent property crime. For the prevention and/or investigation of property crime, your data may be disclosed to the Authorities and State Security Forces and Bodies (investigative agencies; regulatory agencies; law enforcement agencies).

9. Credit and background checks and transmission of data 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.

In addition, we conduct background checks before entering into contracts with corporate customers and partners in order to identify certain risks related to sustainability efforts, compliance with social norms and corporate governance standards, based on criteria recognised by regulations. In this context, we process and transfer your master and contract data to credit agencies in accordance with 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 particular, SIXT may transmit personal data collected within the scope of these contractual relationships regarding the application, the execution and termination of this business relationship as well as data regarding non-contractual behaviour or fraudulent behaviour to Experian Bureau de Crédito, S.A., C/ Príncipe de Vergara 132, 1ª Planta - 28002 Madrid ("EXPERIAN").

EXPERIAN processes 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. More detailed information on EXPERIAN's activities can be found at <https://www.experian.es/legal/politica-privacidad>.

Legal basis for the above processing

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

Our legitimate interest in processing your personal data as part of credit and background checks is that we want to protect ourselves

against non-payment and other losses. In addition, SIXT has a legitimate interest in transferring negative data for the effective enforcement of our claims.

Recipients of your data.

For the above-mentioned purpose we transmit data to Experian Bureau de Crédito, S.A., Holding AG and potentially other credit agencies.

10. 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 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.

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, SLU, reference: Einwand (objection), C/ Canal de Sant Jordi, 29, local 2, Poligono Industrial Son Oms, 07610, Palma (Islas Baleares) or via email to: 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 requirement 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) regarding 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.

11. 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.

12. Damage, accidents and violations

Purposes of data processing regarding damage or accidents

In the event of damage being done to our vehicles, or our vehicles being involved in accidents or incidents of any kind, as well as in traffic offences, 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, identification data, communication data, financial data, contract data, third-party data, vehicle data and telematics data and, where applicable, special categories of personal data (health data).

Legal basis for processing regarding damage or accidents

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.

Purposes of data processing with respect to traffic and driving violation records

In those cases, in which penalty proceedings are notified for traffic and driving offenses committed during your rental period, we process your personal data in order to comply with the legal obligations of identification of the offending driver. In this sense, we supply the external provider that manages the identification of drivers before the issuing bodies of the sanctioning proceedings (GESTORÍAS ASOCIADAS GESTHISPANIA S.L., <https://gesthispania.com/politica-privacidad/>), with your master, identification, contact and contractual data.

In relation to the specific sanctioning file, we offer our customers, through GESTORÍAS ASOCIADAS GESTHISPANIA S.L., the possibility to pay the fine securely using their payment gateway, if allowed by the specific sanctioning file. If you voluntarily wish to use this payment gateway service, you can contract it directly with GESTORÍAS ASOCIADAS GESTHISPANIA S.L.

Legal basis for processing with respect to traffic and driving violation records

Art. 6 (1) paragraph 1 (b), (c) and (f) GDPR.

Our legal interest in using your personal data lies in fulfilling our legal obligations in the field of traffic and driving, as well as in preventing possible traffic offenses committed by our customers from causing us harm. This also includes our legal interest in pursuing legal claims or defending ourselves against such traffic offenses. In addition, with respect to the voluntary payment platform service, our legal interest lies in providing our customers with a quick and easy way to pay their fines.

13. 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.

14. Fraud prevention

Purposes of data processing

We use cookies and other tracking technologies to process data (cf. → Cookies and similar technologies) to determine the end device used by the user and user behavior. The data is stored in databases for fraud prevention, so we can determine, for example, whether logon procedures have already been carried out with your end device in the past and whether the device is "trustworthy". If you log on with unknown end devices, we may 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 associated master data, communication or contractual data. During a reservation process we retrieve a risk assessment concerning the user's end device from a database of a specialized provider. The risk assessment on the probability of fraud attempt takes into account, among other things, whether the end device has been connected through 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. Additionally, for the purpose of risk assessment, we check whether your e-mail address has been for conspicuous behavior or fraud patterns in the database of specialized fraud prevention service providers in the past and includes this into our own decision to execute contracts or issue vehicles.

In addition, for fraud prevention purposes, we determine a risk value for each booking based on statistical characteristics such as the time of booking and pick-up, the vehicle category booked, the number of previous rentals and other comparable characteristics. In the case of bookings with a high risk value, our branch employees are duly notified and instructed to pay special attention when identifying the customer and verifying driving licences. In this context, we process your master data, communication data, contract data and vehicle data.

Legal basis for processing

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

Our legal interest in processing your data in this type of processing to prevent property offences is to protect our fleet of vehicles as well as 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. → E: Transfer to third countries).

15. Breach of contract or the law

Purposes of data processing

In case of signs of criminal activity, e.g., theft, embezzlement, reckless driving, unauthorized use of vehicles or use of the vehicle in breach of contract, e.g., exceeding the maximum rental period or subrenting, we will take the following action for the purpose 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 a telematic alarm system that alerts us in case you leave the contract 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, contractual 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 a telematic alarm system, which is only used if there is a well-founded suspicion of unlawful behavior in a specific case. In such a case, vehicle and telematics data can be attributed to you.
- **Unauthorized tire change/fuel tank emptying:** Our vehicles are equipped with an alarm system to detect any unauthorized tire change or fuel tank emptying. An automatic notification is sent by way of this alert. Master, contractual, communication and telematics data are only attributed to you if such unauthorized 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, identification data, communication data, contractual data and special categories of personal data (biometrics data).
- **Forwarding your data to authorities:** We may forward your master data, identification data, communication data, contractual data, financial data and telematics data to the authorities in cases of unlawful conduct or risk to public security.

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 paragraph 1 first sentence c) and 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.

16. Improving our processes and offerings

Purposes of data processing

To improve the quality of our processes and offerings, as well as to optimize our customer relations, we perform analyses of potential, with the aid of probability values regarding future rentals and take-up rates of 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, optimize 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, communication and contractual data in connection with our collaboration with franchise, cooperation and agency partners and in order to optimize related processes and offers (see → Booking and 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 ensure that the master data we use for contract handling is correct.

Legal basis for processing

Art. 6 (1), paragraph 1, point a) GDPR applies when consent is required to implement measures to optimize processes and supply.

Art. 6, (1), paragraph 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 the customer satisfaction levels.

17. Refer a Friend Programme

17.1. Personal data of the Recommender

Purposes of data processing

Under the "Refer a Friend Program", registered SIXT customers ("Recommender") can 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). The Recommender as well as a Friend will each receive a premium for every Friend 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 implementing the program, as well as for 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 for processing

Art. 6 (1) paragraph 1 point b) GDPR for the processing of data for the purpose of implementing the "Refer a Friend Program" and the fulfillment of the respective contractual obligations, including your right to participate, technical processing of the program, provision of the premium.

Recipients of your data

For the purposes described above, we use information technology service providers, as well as providers of customer loyalty or bonus programs where this is necessary for the technical processing of the "Refer a Friend Program". They will have access to the following data: first name, last name, e-mail address and IP address of the Recommender.

17.2. Personal data of Friend

Purposes of data processing

Recommendations sent by the Recommender to friends, relatives or acquaintances contain a referral link that enables the respective recipient ("Friend") to register for our offer. We only receive your personal data as a Friend when you, as the recipient of a referral, click on the referral link. As part of the "Refer a Friend Program", we only provide the Recommender with a referral link which, from a technical point of view, allows us to process a Friend's registration and assign it to the Referrer in order to provide both the Recommender and the Friend with a premium subject to a successful referral. It is the responsibility of the Recommender to whom you send the referral link to refer a person. In the event that you ignore the referral by not clicking on the Referral link, neither SIXT nor any potential service provider involved as part of the "Refer a Friend Program" will receive and process your personal data.

Each referral link contains a unique identifier of the Recommender (including first and last name) that allows us to assign your registration, as a Friend, to the Recommender. In the event that you, as the recipient of a referral, click on the referral link, we collect and process this information to determine whether your registration is in response to a referral, 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, you provide your master data. The processing of the data collected as part of the "Refer a Friend Program" will be carried out exclusively for the purpose of ensuring the premium for you and the Referrer and to enable the corresponding registration for the SIXT offer.

Legal basis for processing

Art. 6 (1) paragraph 1 point b) GDPR for the processing of data for the purpose of providing the award as part of the registration and setup of your account.

Art. 6 (1) paragraph 1 point f) GDPR for the processing of data for the purpose of implementing the Refer a Friend program, in particular the assignment of the referral to the Referrer to provide them with the prize.

Our legitimate interest in the use of your personal data for the purpose of implementing the Refer a Friend program lies in our desire to ensure the effective and user-friendly management of the Program, in particular the proper recording of a Friend's registration in order to provide both the Friend and the Referrer with the prize, as well as to fulfill the respective contractual obligations to the Referrer.

Recipients of your data

For the purposes described above, we use information technology service providers, as well as providers of customer loyalty or bonus programs when required for the technical processing of the Refer a Friend program. They obtain access to the following data: first name, last name and e-mail address of the Friend.

18. Customer Service

Purposes of data processing

You can contact our Customer Service by phone, email, chat, and post. Depending on the reason for your request, we may process master data, communication data, contract data, and vehicle data in this context.

For our chat service, we store message histories for up to 90 days. You can decide at any time what personal data you would like to provide 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 information about AWS online operations can be found at <https://aws.amazon.com/privacy/>.

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

Legal basis for processing

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

19. Customer service via instant messaging and chatbot

Purpose of data processing

We offer an instant messaging and chatbot service on our websites and in the SIXT app that provides you with immediate assistance on topics such as bookings and 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 will either resolve your request independently or forward it to a 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, financial data and voluntary data that you provide to us in the chat.

Legal basis for processing: Art. 6(1)(f) GDPR.

Our legitimate interest in processing your personal data for the purposes mentioned above is to increase the efficiency, responsiveness and convenience of our customer service and thus improve customer satisfaction.

Recipients of your data

For the purposes mentioned above, we may transfer your data to our messaging and chatbot service provider.

20. 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 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/dataprotection>.

21. 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.

SIXT 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).

22. Events and donations

Purposes of data processing

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

Legal basis for processing

Art. 6 paragraph 1 point f) GDPR.

Our legitimate interest in using your personal data for customer service, customer loyalty and charitable purposes lies in our desire, on the one hand, to provide the best possible services and sustainably raise customer satisfaction, and, on the other hand, to fulfill our social responsibilities as a large company.

23. Access records

Purposes of data processing

When you access our websites, we process data transmitted by your browser to enable you to visit our websites. This is a technically necessary process in which data (such as IP address, date and time of the request, operating system, browser type, including language and version) is transmitted. The data is used to ensure stability and security, i.e., to monitor server capacity, to find and eliminate errors and to defend against and 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 made anonymous 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), paragraph, 1 letter f) GDPR.

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

24. 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 programs 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 "L Rights of data subjects" (see → Right of access by the data subject, Art. 15 GDPR).

Legal basis for 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 interest in processing your personal data through our websites lies in our desire to optimize our internet offering and, as such, to offer our customers the best possible services and to increase customer satisfaction.

25. Video surveillance

Purposes of processing

We use video surveillance systems at some SIXT branches and other SIXT buildings/properties. We process photo/video recordings on these systems.

The processing of your personal data within the scope of video surveillance is carried out for the following purposes: (i) exercise of domiciliary rights; (ii) prevention and investigation of crimes; (iii) preservation of evidence; and (iv) protection of life, physical integrity and property.

Legal basis for 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 physical integrity, 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 crimes.

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, for example if it is necessary to extend the period for preserving evidence or investigating a specific crime, this data will be deleted immediately as soon as it is no longer necessary for these purposes. In certain locations or areas (e.g. security zones), the retention period may be longer. In such cases, the applicable storage period is indicated on the relevant information sign.

F: 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).

G: Categories of recipients of your data recipients

We sometimes use the services of external service providers and companies belonging to the SIXT Group to fulfil our contractual and legal obligations, as well as to satisfy our legal interests.

We may also transfer your personal data to other recipients, such as public authorities, e.g., to fulfil our legal obligations to communicate to authorities and State Security Forces and Bodies, tax authorities or judicial authorities; authorities responsible for imposing fines, to credit institutions, e.g., to handle payments; to car park management companies to experts, e.g., to handle claims; to lawyers, e.g. to defend and pursue legal claims; to insurance companies, to insurance brokers e.g. to handle claims.

H: Transfers 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 the 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 para. (2) GDPR. You can request copies of the aforementioned safeguards from SIXT by writing to the address specified above). (cf. → Data controller, contact details). Third countries are all 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.

I: Duration of storage

We store your personal data until the data is no longer needed in connection with the purpose for which it was collected or processed (see → Purpose of processing at SIXT). Your SIXT account will be deleted for inactivity if you do not use it to rent a vehicle from SIXT for six years. Such account deletions are performed annually.

Where SIXT is required by law to store personal data, this storage is done for the legally required period of time. This includes statutory limitation periods. In the case of commercial documentation, which includes commercial trade books and accounting documents (such as invoices), the storage period can range from 6 years (Art. 30 of the Commercial Code) to 10 years in relation to tax base offsetting. During this time your data may be subject to restricted access in respect of daily operations if their processing does not serve any other purpose. The legal basis for this storage is Art. 6 (1), paragraph 1, point c) of the GDPR in accordance with the respective legally prescribed time limit.

J: Automated decision making.

The aforementioned data processing does not include any automated decision making in accordance with Art. 22 of the GDPR.

K: 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 instances cases:

- We evaluate data by means of what are known as connected vehicle functionalities so that we can maintain, care for and organize our vehicle fleet. These measures are also intended to protect you (cf. → **Error! Reference source not found.**, → Connected vehicles).
- We perform potential analyses to improve the quality of our processes and offerings and to optimize our customer relationships. To this end, our customers are grouped according to certain criteria, such as order history, sales revenue and claim statistics (cf. → **Error! Reference source not found.**, → Improving our processes and offerings).
- We implement various measures to be able to provide you with specific product information and advice. This makes it possible to carry out appropriate advertising activities, including market research and surveys (cf. → **Error! Reference source not found.**, → Marketing and direct advertising).

L: 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 after the end of the year in which we responded to your request 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 in the public interest or in the exercise of official authority vested in the controller (Art. 6 (1) paragraph 1 point e) GDPR) or is based on the legitimate interests of SIXT (Art. 6 (1) paragraph 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 profiling based on this provision as defined in 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 purpose of direct marketing purposes (as defined in section E, 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 direct marketing; 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 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.L.U., Canal de Sant Jordi, 29, local 2, Polígono Industrial Son Oms, 07610, Palma (Islas Baleares)

Or sending an e-mail to: 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

9. Right to lodge a complaint, Art. 77 GDPR

You have the right to lodge a complaint with a supervisory authority (Art. 77 of the 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 Spain, where SIXT has its registered office, the competent supervisory authority is:

Agencia Española de Protección de Datos (AEPD)
C / Jorge Juan, 6
28001 – Madrid

General information

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

Current version: June 2025