



# Privacy policy

In the following we would like to inform you about the types of data processed by SIXT and about the purposes of data processing. We would also like to inform you about important legal aspects of data protection, such as your rights.

#### **A: Data controller**

SIXT Denmark A/S (Kystvejen 42, DK-2770 Kastrup) is a franchisee of SIXT SE (Zugspitzstraße 1, 82049 Pullach) SIXT Denmark and SIXT SE therefore has a shared data responsibility.

If you have used services offered by Sixt Danmark A/S, the office responsible for processing data is SIXT Danmark A/S. As the franchisee, SIXT Danmark A/S is the data controller of the data collected through the website, [sixt.dk](http://sixt.dk) in connection with reservations, inquiries and renting of motor vehicles. If you have rented through SIXT in a country other than Denmark, the said entity is the data controller.

If you have any questions regarding data protection for any rental reservation related matters, please address your query to the following email address [datasecurity@sixt.dk](mailto:datasecurity@sixt.dk)

#### **Booking request through our website: mini-lease.dk**

If you book your vehicle through our webpage [mini-lease.dk](http://mini-lease.dk), the following personal data may be processed in connection with your request.

Name, address, email-address, phone number, date of birth and social security number.

The above information is used for validating your identity and to check whether you are already a registered customer at Sixt. Your social security number is also processed in order to perform a credit check to reduce the risk of non-payment.

Upon approval of your request, your personal data in terms of name, address, email-address, date of birth and phone number along your preference for the booked vehicle will be transferred to our booking system, on which the following privacy policy will apply. Your social security number is stored for 30 days whereafter it is deleted.

In the event that it is not possible for us to accept your request, your order and associated data will be deleted after 30 days.

#### **Recipients of your personal data.**

Sixt Denmark uses subcontractors for the maintenance and operation of the website **mini-lease.dk**. The supplier thereof and their sub-suppliers may thus have access to personal data as part of their operation of the service and maintenance. All are covered by data processing agreements to ensure data protection according to the standard that follows from current data protection legislation.

#### **B: Categories of personal data**

The following categories of personal data may be processed in connection with our services:

- Master data: The person's first name, surname, address (private and/or business), date of birth.
- Communication data: The person's telephone number, email address (private and/or business) fax number if applicable, as well as the content of communications (e.g., emails, letters, faxes).
- Contract data: Rental information (vehicle category, pick-up and return dates, pick-up and return branch, booked extras/services), rental contract number, reservation number, driver's license data, driver's license photograph, license plates of the vehicle you rented, and information on customer loyalty and partner programs.

- Financial data such as credit card data.
- Voluntary data: These are 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.
- Special data categories: In the event of an accident, damage to the vehicle, or similar incidents, we process data relating to the respective course of events and the damage incurred. These 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 and the like.
- Third-party data: If, within the scope of your vehicle rental, you provided us with personal data of third parties (e.g. second drivers, Travel agency), then we will also process these data.
- Location data: Location data is collected and processed for certain fleet vehicles that are – from the manufacture equipped with senders for the collection of location data. Please note that SIXT do not have any access to such data.
- Telematics data (for some vehicles): e.g. GSM trigger, mileage, fuel tank volumes, vehicle location data, vehicle events.

### **C: 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 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 defense of legal claims. These special categories of personal data include the health data of the data subjects.

### **D: The purposes of data processing at SIXT**

#### **1. Reserving and renting vehicles**

Purposes of data processing

We process your master data, communication data, contract data, financial data, and any data you have provided voluntarily for purposes of implementing your reservations and facilitating the conclusion and performance of your rental contract.

We moreover use the master data, communication data and contract data for customer relations purposes, for example to handle any complaints or changes of reservation that you contact us about.

If you book your vehicle through travel agencies, online travel agencies or other agents, your account master data, communication data, rental information and, if applicable, financial information, will be transferred to us by our partners.

Furthermore, we use your master- and contract data for purposes of settling accounts (e.g., commissions and sales processing) For example, travel agencies, other agencies, franchise partners and cooperation partners.

We use your data, for your and our security, for example to avoid payment defaults and to prevent property offences (fraud, theft, embezzlement).

In some rental branches we use a technology that verifies the authenticity of ID documents (especially driver's license) and records the data electronically instead of manually.

If you request to pay for your rental by invoice, then we process your master and financial data to assess your credit score by obtaining the corresponding information from credit agencies.

Once both contracting parties have fulfilled their obligations under the rental contract, your master- financial- and contract data will be stored until the statutory retention period expires.

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 implement reservations, to conclude and perform contracts and for customer relations purposes.

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.

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 examine and store driver's license data, and to comply with preservation periods under commercial and tax law.

Legitimate interest, to the extent that Art. 6 (1) point f) GDPR applies to the type of processing concerned.

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 nonpayment or the loss of our vehicles.

Categories of recipients

For the purposes described in the foregoing (especially for informing the local rental partner about a reservation or for processing of credit card payments with your credit card company), we disclose your data to the following recipients: IT service providers, financial services providers, credit agencies, SIXT group companies, cooperation and agency partners and franchise partners. 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.

## **2. Marketing and direct advertising**

Purposes of data processing

We process your master- communication- and contract data for purposes of promoting customer loyalty, implementing customer loyalty and bonus programs (including our own and those of our cooperation partners), optimizing customer offers, market or public opinion research as well as holding customer events (see also → Events and donations).

You may object to any processing or use of your data for direct marketing purposes at any time. Please send any objections to: Sixt SE, Zugspitzstraße 1, 82049 Pullach or via email to: [dataprotection@sixt.com](mailto:dataprotection@sixt.com).

Legal basis for processing

Art. 6 (1) point a) GDPR applies to data processing for purposes of implementing direct marketing measures that require explicit prior consent.

Art. 6 (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).

Legitimate interest, to the extent that Art. 6 (1) point f) GDPR applies to the type of processing concerned.

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.

Categories of recipients

For the purposes described in the foregoing, we disclose your data to IT service providers, call centers, advertising partners and providers of customer loyalty and bonus programs.

### **3. Business customers/payment by third parties**

If you rent a vehicle through your employer, we also process your data for the purposes described in this Data Privacy Policy. This also applies mutatis mutandi if a third party is to pay the invoice.

Categories of recipients of your data

We transmit personal data collected during the rental (in the form of invoices and rental agreements, 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.

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 implement reservations, to conclude and perform rental and framework agreements and for customer relations purposes, otherwise Art. 6 (1) point f) GDPR.

Legitimate interest, to the extent that Art. 6 (1) point f) GDPR applies to the type of processing concerned 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 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.

### **4. Damage, accidents, administrative offences**

Purposes of data processing

If you discover damage to our vehicles, if you or another person cause/causes such damage, or if you or another person are/is involved in an accident with one of our vehicles, then we will process your master data, communication data, contract data, financial data and, if applicable, data concerning health for the following purposes:

- receiving and processing complaints
- providing customer services in cases of damage

- settling claims
- processing damages resulting from accidents (processing based on information provided by you and third parties such as the police, subsequent renters, witnesses, etc.)

This includes the processing of the beforementioned data categories for purposes of settling claims, for example vis-à-vis insurance companies.

When dealing with damages and accidents, we also process your master data, communication data and contract data for providing damage assistance services.

We also process your master data, communication data and contract data for purposes of fulfilling legal obligations (e.g. providing information to investigating authorities).

Should the competent authorities suspect you of having committed an administrative 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.

We also process your master data, communication data, financial data, contract data and, if applicable, data concerning health, for purposes of upholding and asserting any claims that we may have against you, for example claims resulting from non-payment or damage caused to our vehicles.

Legal basis for processing

Art. 6 (1) sentence 1 point b) GDPR applies to data processing for purposes of complaints management, providing customer services in cases of damage, and processing damages resulting from accidents.

Art. 6 (1) sentence 1 point c) GDPR applies to data processing for purposes of processing damages resulting from accidents.

Art. 6 (1) sentence 1 point f) GDPR applies to data processing for purposes of settling claims, asserting any claims that we may have against you, and handling claims relating to administrative offences.

Art. 9 (2) Point (f) GDPR applies to processing of information about health for the purpose of establishing, exercising, or defending legal claims.

Art. 6(1) Point (f) GDPR applies to the said processing, legitimate interests, to the extent.

Legitimate interest, to the extent that

Art. 6 (1) sentence 1 point f) GDPR applies to the type of processing concerned Our legitimate interests in using your personal data for purposes of settling claims and asserting any claims that we may have against you lies in our desire to ward off damage to our company and to ensure that we can provide our customers with undamaged vehicles. We are moreover obliged, pursuant to our contractual relations with third parties (e.g. insurance companies), to process your data for purposes of settling claims. Our legitimate interests in this respect lie in ensuring our contractual fidelity.

Our legitimate interests in using your personal data for the purpose of determining legal proceedings and making any claims that we may have against you are in our wish to prevent damage to our business and to ensure that we can give our customer undamaged vehicles. Otherwise, we are obliged under our contractual relationships with third parties (such as insurance companies) to process your data for the purpose of conducting legal proceedings. In such respect, our legitimate interest lies in ensuring our contractual loyalty.

### **Categories of recipients of your personal data.**

For the purposes described above, we disclose your data to the following recipients: Public authorities (investigation authorities, supervisory authorities, police authorities), collection/debt recovering agencies, assistance services, lawyers, and insurance companies.

## 5. Connected vehicles

Sixt cars can be equipped by the manufacturer with remote services, also called ConnectedDrive or Connected cars. Lessor has no authority to disable or reset these services and will therefore discourage any use of them. In this connection, renter is made aware that any use and subsequent uninstallation is at the renter's own responsibility.

## 6. Geolocalisation

Purposes of data processing

Sixt cars may have tracking equipment installed or otherwise prepared for lessor to process location data. These data are exclusively used in anonymized form or in cases, where Sixt needs to locate the vehicle, for example in connection with damages, requests from the authorities, theft or breach of the terms and conditions in the rental agreement.

Legal basis for processing Art. 6 (1) sentence 1 point f) GDPR. Legitimate interest, to the extent that Art. 6 (1) sentence 1 point f) GDPR applies to the type of processing concerned Our legitimate interest in using your personal data to prevent property offences and to determine, verify and investigate car damages and accidents is to protect our vehicle fleet and our contractual and non-contractual rights.

Categories of recipients

For specific car categories we partner with providers of geolocalisation services to prevent property offences and theft.

## 7. Processing based on statutory provisions

Purposes of data processing

We process your master data, communication data, contract data and financial data for purposes of fulfilling the legal obligations to which SIXT is subject. These require us to process data, for example in order to comply with duties of disclosure vis-à-vis authorities and to comply with the processing requirements as stipulated by commercial and tax law provisions (e.g. the preservation period for bookkeeping documents and accounting records).

Legal basis for processing Art. 6 (1) sentence 1 point c) GDPR Categories of recipients.

The authorities may require us to disclose your data to them for the purposes described above.

## 8. Improving our processes and offerings

Purposes of data processing We process your master- communication- and contract data, as well as any data provided voluntarily, for purposes of optimizing our processes and offerings.

### **Block listing in our systems:**

In some cases, we register a blocking of customers in our system. This occurs in case of failure to appear to surrender if the car has been stolen or if there are matters indicating fraud or other crime. A blocking may also occur if there are financial balances due in which no agreement on payment has been made. If you have been registered in our system with a blocking, you will not be able to rent a car with Sixt, neither in Denmark, nor elsewhere in the world. A blocking is registered in the system that is used by Sixt all over the world. We are not able to inform you of the reason for a blocking if it has not been made by Sixt Denmark, as the reason for the blocking will only be visible for responsible office. Sixt Denmark is the data controller of the processing and registration made in and by Sixt Denmark, but not registrations made in other countries by

other Sixt franchisees. If you have been blocked in Sixt, the responsible office will always inform you beforehand.

This involves, for example, compiling and evaluating rental reports, implementing capacity planning to improve vehicle allocation procedures, setting up a data warehouse, analyzing and rectifying sources of error, and conducting customer satisfaction surveys.

To improve the quality of our offering and our customer services, we process your master data and contract data based on an algorithm with a view to, for instance, creating profiles and probability values in relation to future rentals and to take-up rates for our offers. We also process your master data, communication data and contract data in connection with our collaboration with franchise partners, cooperation partners and agency partners, and for purposes of optimizing the related processes and offers (cf. → Reserving and renting vehicles).

We also process address data originating from external service providers to update our address database and to ensure that the master data we use for contract handling is correct.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) of the General Data Protection Regulation (GDPR) applies where consent is required to implement measures intended to optimize our processes and offers.

Art. 6 (1) sentence 1 point f) GDPR. Legitimate interest, to the extent that

Art. 6 (1) point f) GDPR applies to the type of processing concerned 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.

Categories of recipients

For the purposes described in the foregoing, we disclose your data to the following recipients: IT service providers, cooperation partners, agency partners and franchise partners.

## **9. Events and donations**

Purposes of data processing

We may also process your master data and communication data to invite you to an event as part of our customer service and customer loyalty activities. We may

moreover, use your master data and communication data for charitable purposes (e.g. to appeal for donations).

Legal basis for the above processing Art. 6 (1) sentence 1 point f) GDPR applies to data processing for purposes of acquiring customers, strengthening customer relations, and managing business customers.

Legitimate interest, to the extent that Art. 6 (1) point f) GDPR applies to the type of processing concerned.

Our legitimate interests in using your personal data for customer service, customer loyalty and charitable purposes lie in our desire to, on the one hand, offer the best possible services and sustainably raise customer satisfaction, and, on the other, fulfil the social responsibilities that we, as a large company, are bound to.

Categories of recipients

For the purposes described in the foregoing, we disclose data relating to contacts at our business customers to the following recipients: IT service providers, event organizers.

## **Cookies**

### Purposes of data processing

Our websites use “cookies”. Cookies are small text files that are copied from a web server onto your hard disk. Cookies contain information that can later be read by a web server within the domain in which the cookie was assigned to you.

Cookies cannot execute any programs or infect your computer with viruses. The cookies used by us neither contain personal data nor are they connected to any such data. Further information on cookies and on deactivating them can be found in the cookie policy of the respective website (accessible via the link in the respective cookie banner and under the menu item “privacy policy”).

### **E: Transfer 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 programs from third countries. In cases of damage and/or accidents suffered in a third country, we may send your personal data and 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 (2) GDPR. You can request copies of the beforementioned safeguards from SIXT by writing to the address specified above (cf. → Controller). Third countries are countries outside the European Economic Area. The European Economic Area comprises all countries of the so-called European Free Trade Association, which are Norway, Iceland and Liechtenstein.

### **F: Storage duration/criteria for storage duration**

SIXT stores your personal data until they are no longer necessary in relation to the purposes for which they were collected or otherwise processed (cf. → Purposes of data processing at SIXT). If you have not rented with SIXT for six years, your customer account will be deleted for inactivity. We carry out this deletion routine once a year. Where SIXT is under legal obligation to store personal data, it will store personal data for the preservation period stipulated by law. The preservation period for commercial documents, which include bookkeeping documents and accounting records (including invoices), is up to 10 years. Invoices for Corporate customers will follow the Danish law, which is up to 5 years from the current year. This also includes invoices concerning damages. During this period, your data may be subject to restricted use within day-to-day operations if its processing serves no further purposes.

### **G: Your rights**

#### **1. Rights pursuant to Art. 15 - 18, 20 GDPR**

You have the right to, at reasonable intervals, obtain information about your personal data under storage (Art. 15 GDPR). The information you are entitled to includes information about whether SIXT has stored personal data concerning you, about the categories of personal data concerned, and about the purposes of the processing.

Upon request, SIXT will provide you with a copy of the personal data that are processed. You also have the right to obtain from SIXT the rectification of inaccurate personal data concerning you (Art. 16 GDPR). You furthermore have the right to obtain from SIXT the erasure of personal data concerning you (Art. 17 GDPR). 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, and if the personal data have been unlawfully processed.

Under certain circumstances, you have the right to have the processing of your personal data restricted (Art. 18 GDPR). These include circumstances in which you contest the accuracy of your personal data and we

then must verify such accuracy. In such cases, we must refrain from further processing your personal data, except for storage, until the matter has been clarified.

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 (Right to data portability, Art. 20 GDPR).

## **2. No contractual or legal obligation to provide data/consequences of failure to provide data.**

You are not contractually or legally obliged to provide us with your personal data. Please note, however, that you cannot enter a vehicle rental contract with us, or avail of other services provided by us if we are not permitted to collect and process the data as required for the purposes specified in the foregoing (cf. → The purposes of data processing at SIXT)

## **3. Right to object pursuant to Art. 21 GDPR**

If the processing of your data by SIXT is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Art. 6 (1) sentence 1 point (e) GDPR) or if it is necessary in the legitimate interests of SIXT, then you have the right to object at any time, on grounds relating to your particular situation, to the processing of your data. SIXT will then end the processing, unless we can present compelling legitimate grounds for such processing that supersede the grounds for ending the processing.

You may object, at any time and without restriction, to the processing of your personal data for purposes of direct advertising.

Right to withdraw consent at any time 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.

## **4. Right to lodge a complaint**

You have the right to lodge complaints with the supervisory authorities according to Art. 77 GDPR.

The supervisory authorities for Denmark are:

### **Datatilsynet**

Carl Jacobsens Vej 35, DK- 2500 Valby

Tlf. +45 33 19 32 00

Email: dt@datatilsynet.dk