

PRIVACY POLICY

LänsiAuto Rent Oy (business ID 2883828-6) is part of the LänsiAuto Group. LänsiAuto Rent Oy is a franchisee of the Enterprise Holdings' (later "Enterprise") brands Enterprise Rent-A-Car, National Car Rental and Alamo Rent A Car which are available to corporate, replacement and leisure customers in Finland.

The purpose of this Privacy Policy is to inform how LänsiAuto Rent Oy (later "LänsiAuto" or "we") process your personal data; what personal data we collect, how the data is used and to whom the data is disclosed. In addition, we tell you how you can control the processing of your personal data. "Personal Data" refers to any information about natural person (later "Data Subject"), which allows a person to be directly or indirectly identified as an individual person, as defined in the EU General Data Protection Regulation (2016/679).

This Privacy Policy is applicable to all car rental services and other services (including our website and social media services) offered by LänsiAuto Rent Oy under the above-mentioned brands of Enterprise. This Privacy Policy applies to processing of Personal Data of our customers (including drivers and/or additional drivers and/or authorised drivers) and potential customers as well as our website users and visitors.

We are dedicated to processing the Personal Data in compliance with the European Union's General Data Protection Regulation and other applicable privacy laws (together as "data protection legislation").

WHAT PERSONAL DATA WE COLLECT?

Information collected about you

We only collect the Personal Data which is relevant and necessary for the purposes outlined in this Privacy Policy.

The following information is being gathered from and processed on the Data Subjects:

Categories of Personal Data	Examples of data content
Contact information	Name, address, phone number and email.
Identity information	Date of birth, passport or ID card information.
Driver's license information	Driver's license number and expiration date.
Rental information	Vehicle rental information, including the location of where the vehicle is rented, date of rental, type of rental and your preferences.
Payment information	Credit card details.
Other information	Online user account details, membership/corporate ID numbers and frequent flyer or travel partner affiliations, emergency contact information.
Electronic identification and behavior data	Cookies data and IP address. More information can be found in our Cookie Policy.

Providing the above-mentioned information is necessary to fulfil the obligations of the rental contract between LänsiAuto and the Data Subject, and statutory obligations as well as for providing our services.

Data sources

The Personal Data is mainly collected from the Data Subjects themselves, for example, in connection with marketing or in connection with entering into a rental contract, during the customer relationship and if required by the law also from other sources.

Third parties may provide us with additional information about you, including:

- Referral sources, such as third-party online booking sites (who provide us general contact information and a booking confirmation number to facilitate the rental), your employer (general contact information), and your insurance provider (general contact and policy information).
- Hotel, airline and membership clubs, who provide us your general contact information and booking information.
- Credit reporting agencies, who, for fraud prevention purposes, provide us with identity-related information.
- Service providers, such as customer support (customer service-related information and enquiries made by you) and marketing providers (information to assist us to better communicate our products and services).

Vehicle operation and location data

Your vehicle may be equipped with (i) emergency notification functionalities such as an eCall System and (ii) telematics systems and infotainment ("Telematics Systems") which are independently controlled by the manufacturer ("OEM") of your vehicle. The eCall System is provided in order to ensure that you and your passengers receive appropriate assistance in the case of an emergency. In the event that a vehicle has been reported as potentially or actually lost or stolen, we will request access to the necessary Telematics Systems data from the relevant OEM. Contact details of the OEMs along with their applicable privacy disclosure which may include system and service limitations, warranty exclusions, limitations of liability, descriptions of use, disclosure and retention of information, your individual rights, and any data transfer outside the European Economic Area may be found on the OEM's websites or may be available via the vehicle dashboard.

When you use any satellite navigation or infotainment system in this vehicle, you are responsible for any information that is stored in the systems as a result of your use. We cannot guarantee the privacy or confidentiality of such information, and you must wipe it before you return the vehicle to us. If you do not do this, the next users of the vehicle will be able to access this information.

WHY DO WE PROCESS PERSONAL DATA?

We process the Personal Data to offer the services and to maintain relationship with our customers. In this context, the Personal Data may be processed for the following purposes:

- Managing the rental and the commercial relationship.
- Communication with the customer about or assist with his rental.
- Contractual necessity (e.g. billing).
- Ensuring the effective delivery of the requested services.
- Storing the Personal Data that relates to any incident arising from the Data Subject's dealings with LänsiAuto if LänsiAuto thinks that, as a result of such incident, the Data Subject could be a risk for

future rentals and by doing this LänsiAuto protects employees, other customers, the public and property from safety or financial risks based on past customer conduct.

- Verifying driving and credit information (including the Personal Data) provided through credit agencies, relevant driver and vehicle licensing agencies, fraud prevention agencies/databases or other sources.
- Carrying out phone customer satisfaction surveys.
- Ensuring customer satisfaction of the services which we provide.
- Marketing communications (for instance by post or electronic communications) including the provision of targeted advertising on our sites, selected partner sites and social networks.
- Compile statistics and analysis about the Data Subject's use of our products and services, including statistics based on anonymized data which enable us to provide you and other customers in the future with better customer service, products, features and functionalities.
- Business planning and product development.
- Complying and fulfilling our legal duties and obligations such as tax law and accounting related obligations.
- Ensuring security of our products and services and preventing abuses.
- Ensuring security of our IT environments and protection of data.

The legal basis for the processing of the Personal Data is the rental contract between LänsiAuto and the Data Subject. In addition, when we inform the Data Subject about our services, deliver and maintain our services, ask feedback, or provide other relevant marketing information about our services and maintain the customer relationship, our legitimate interest constitute a legal basis for the processing. In this respect, processing of Personal Data is related to our customers, potential customers, our services and other service providers. When we rely on our legitimate interests as a legal basis for processing the Personal Data, we have considered whether or not those interests are overridden by the rights and freedoms of the Data Subjects and have concluded that they are not.

WHO WE SHARE INFORMATION WITH?

For the purposes stated in this Privacy Policy, we will share your Personal Data with third parties, such as (1) payment, administrative and technical support providers, (2) our insurance, corporate rental or other customers or partners to facilitate the rental transaction, (3) communication providers which send email and other marketing and service-related communications to you on our behalf, (4) customer support providers in order to provide you customer service, (5) debt collection providers, (6) claims processors, (7) our advertising and marketing partners and third-party media properties, including social media sites and (8) other service providers. In addition, the Personal Data may be processed within LänsiAuto Group.

- More information about the processors and other recipients can be provided upon request.

We also share the Personal Data with Enterprise (including its affiliates and business partners) for the following purposes:

- To manage your rental and for Enterprise to communicate with you about or assist with your rental.
- In relation to any incident arising from your dealings or an additional and/or authorized driver's dealings with Enterprise if Enterprise thinks that, as a result of such incident, you or an additional and/or authorized driver could be a risk for future rentals.
- In order for Enterprise and its third-party service provider to carry out phone customer satisfaction surveys.

- To send you marketing communications about similar products or services which Enterprise thinks may be of interest to you, including targeted advertising on Enterprise sites, selected partner sites and social networks.
- To compile statistics and analysis about your use of Enterprise’s products and services, including statistics based on anonymized data, which enable Enterprise to provide you and other customers in the future with better customer service, products, features and functionalities.

Enterprise maintains its own privacy policy in respect of the information we provide Enterprise. You are encouraged to review Enterprise’s privacy policy, which can be found [here](#).

The Personal Data may be shared with authorities if required by laws. The Personal Data may also be transferred to another company in the event of a transfer, change of ownership, reorganization or assignment of all or part of our businesses or assets.

HOW ABOUT GLOBAL PERSONAL DATA TRANSFERS AND PROCESSING?

The Personal Data may also be transferred outside the European Union and the European Economic Area (“EU/EEA”). In case the Personal Data is transferred outside EU/EEA, such transfers are either made to a country that is deemed to provide a sufficient level of privacy protection by the decision of the European Commission or transfers are carried out by using appropriate safeguards such as standard contractual clauses adopted by the European Commission. The following recipients may process data outside EU/EEA:

Recipient	Transfer safeguard
EHI Franchising (EMEA) Ltd	EU-U.S. Privacy Shield Framework
TSD Rental LLC	Standard contractual clauses
EAN Data Services UK Ltd	Standard contractual clauses

- More information about the global data transfers can be provided upon request.

HOW DO WE PROTECT PERSONAL DATA?

We commit to follow the security provisions of data protection regulations, as well as to process the Personal Data in compliance with good processing practices. We process the Personal Data in a manner that seeks to ensure in every situation the proper security and privacy of Personal Data, including the protection against unauthorized processing and accidental loss, destruction or damage.

We use appropriate technical and organizational safeguards to protect the Personal Data, including the use of firewalls, encryption techniques and safe device facilities, proper access control and guidance for personnel and subcontractors involved in processing of Personal Data. Documents retained as original copies shall be kept in locked premises.

Our personnel and processors that process the Personal Data are obliged to keep the Personal Data strictly confidential. Access to the Personal Data is only granted to those employees that need the information to perform their work duties.

FOR HOW LONG IS PERSONAL DATA KEPT?

The Personal Data collected shall be retained as long as need for the purposes defined in this Privacy Policy, unless such Personal Data is replaced through regular updates or otherwise. We retain the Personal Data for commercially reasonable periods of time or in accordance with specific laws or policies. The Personal Data collected for a specified purpose will only be used for that purpose. When that purpose has been fulfilled the

Personal data may, however, continue to be used for statistical, marketing, archiving, and other analytical purposes.

We evaluate the necessity and accuracy of the Personal Data on a regular basis and endeavor to ensure that the incorrect and unnecessary Personal Data are corrected or deleted.

- More detailed retention times or retention criteria can be provided upon request.

WHAT ARE YOUR RIGHTS?

As a Data Subject, you have the rights under the applicable data protection legislation.

As a Data Subject, you can:

- Access your Personal Data processed
- Obtain a copy of your Personal Data on request in a structured, commonly used and machine-readable format insofar as the processing is based on contract, and insofar as you have provided the information to LänsiAuto
- Require LänsiAuto to change the incorrect or incomplete Personal Data
- Require LänsiAuto to delete or stop processing your Personal Data, for example where the data is no longer necessary for the purposes of processing (However, please note that certain Personal Data is strictly necessary in order to achieve the purposes defined in this Privacy Policy and may also be required to be retained by applicable laws. Thus, you may not delete such Personal Data.)
- Object to the processing of your data where LänsiAuto is relying on its legitimate interests as the legal ground for processing. For example, you may object to your Personal Data being used for marketing purposes at any time.
- Ask LänsiAuto to restrict processing Personal Data for a period if data is inaccurate or there is a dispute about whether or not your interests override LänsiAuto's legitimate grounds for processing data
- Withdraw your consent if the processing of Personal Data is based on your consent. You have the right to withdraw consent at any time. The withdrawal does not affect the process based on consent before the withdrawal.

The Data Subject may exercise the aforementioned rights visiting in our premises or by sending a written request to privacy@enterprise.fi.

If you believe that we have not complied with applicable data protection legislation when processing your Personal Data, you can lodge a complaint with a supervisory authority. In Finland, that is the [Data Protection Ombudsman](#).

CONTACT INFORMATION AND DATA PROTECTION OFFICER

Controller: LänsiAuto Rent Oy (business ID 2883828-6)

Address: Laivalahdenkatu 8 B, 00880 Helsinki, Finland

Point of contact: Data protection officer of LänsiAuto Group Antti Nevalainen

Contact details: privacy@enterprise.fi

If, at any time, you as the Data Subject have questions or concerns about this Privacy Policy, please contact privacy@enterprise.fi.

CHANGES TO THIS PRIVACY POLICY

We may change this Privacy Policy from time to time, whenever necessary. The changes might also be based on the amendments of the legislation. All changes will be made available on our website where we publish this Privacy Policy. The Data Subjects are highly recommended to review the Privacy Policy on our website every now and then. Unless stated otherwise, the then-current Privacy Policy applies to all Personal Data we process at the time.

This Privacy Policy has been published on 23.1.2019.

Version 1.0.

Version history

Version number	Change description	Date