

Europcar Italia Spa

Privacy Policy

1. Who processes your personal data?

Europcar Italia S.p.A, subject to the management and coordination of Europcar Mobility Group SA , with head office located in 39100 - Bolzano, Corso Italia 32, Tax ID and VAT Reg. No. 05035331007, (“Europcar”) and its parent company Europcar International S.a.s.u. (“ECI”) with head office located in 13 Ter Boulevard Berthier 75017 Paris, France, are companies that in their capacity as Data Controllers, collect and process your Personal Data via this website, our mobile applications, or our rental agencies in order to offer you mobility solutions.

For more details about the processing of your personal data by ECI, please check the specific privacy statement on the [website https://www.europcar.com/security-and-privacy-policy](https://www.europcar.com/security-and-privacy-policy).

The term "Europcar" that we use in this policy will refer to Europcar Italia S.p.A.

Europcar Italia S.p.A and ECI are members of the Europcar Mobility Group. The terms "our Group", "we", "us" or "our" refers to Europcar Mobility Group.

When you communicate Personal Data to us or when we collect Personal Data about you, we undertake to use it in accordance with this Policy.

2. What Personal Data do we collect about you?

As a provider of mobility solutions, we collect and process various categories of Personal Data in connection with this website and our mobile applications and in order to provide you with our products and services.

By Personal Data, we mean not only data that identifies you directly, but also data that identifies you indirectly.

The categories of Personal Data that we collect in the context of our services and the use of our website and our mobile applications include the following:

- Your identification data: surname, first name, email address, telephone number, postal address, account identifier,
- If applicable, identification data of additional driver(s): surname, first name, email address, telephone number, postal address,
- Your driver's licence and that of any additional driver(s),
- Payment data: account numbers, card numbers, etc.
- Financial data: your order forms, your customer invoice etc

- As the case may be, data relating to traffic violations
- Information about your flight in the event that the pickup location of your vehicle is an airport,
- Information on your vehicle reservation, in particular to feed the loyalty programs of which you would be a member.
- Data relating to your navigation on our website or our mobile applications;
- Data relating to your satisfaction surveys or from your interactions on our dedicated social media pages;
- Voice, audiovisual and electronic data: recordings of your communications by e-mail, chat or telephone with our customer service department;
- Information collected through our Connected Vehicle (if the vehicle that you rent is a connected vehicle) : vehicle status, damage or accident information, vehicle performance data, operational and diagnostic data, mileage information, acceleration and braking speeds, fuel consumption and fuel levels, tire pressure, odometer readings, vehicle location and other vehicle information. For any information regarding the data processing of Europcar's connected vehicles, please consult the [dedicated Privacy Policy](#).
- Data related to cookies and other similar technologies. For information on the use of cookies, please consult our [policy](#).

We collect most of your personal data directly from you, but we may receive data from third parties, including the competent authorities in charge of managing fines for traffic violations.

3. For what purposes do we process your Personal Data ?

We collect and process your Personal Data for various purposes and on the following legal bases:

Purposes of the processing	Legal basis of the processing
The creation and management of your customer account	This processing activity is based on the acceptance of the terms and conditions of use of our website or our mobile applications.
The management of your reservation and rental contract, in particular for: <ul style="list-style-type: none"> - Confirming, modifying or cancelling your reservation ; - To communicate with you regarding your reservation and rental (for example, to provide you with information about your reservation and rental, to send you reminder 	These processing activities are necessary for the execution of the rental services contract that you enter into with us. You can choose to register your credit card for your subsequent payments.

<p>notifications before you return your vehicle, to answer your questions or suggestions);</p> <ul style="list-style-type: none"> - manage your rental; - manage your payment and invoices; - manage the collection of amounts due (including subsequent costs such as fines for traffic violations, or compensation for damage to the vehicle); - managing claims; - purchase and manage insurance for your Vehicle; xi. purchase and manage insurance for your Vehicle 	
<p>The management of commercial documents (customer invoices, purchase orders, certain electronically concluded contracts)</p>	<p>This processing activity is based on our legal obligations.</p>
<p>The checking of your driver's license</p> <p>This validation can be carried out (i) manually by our customer service department or (ii) using a facial recognition device.</p>	<p>(i) This processing is necessary for the performance of the rental services contract that you enter into with us.</p> <p>(ii) The use of the facial recognition solution is based on your consent.</p>
<p>Fight against credit card fraud</p>	<p>This processing is based on our legitimate interest in protecting ourselves against credit card fraud. This processing is based on our legitimate interest in protecting ourselves against credit card fraud.</p>
<p>Verifying that you are not recorded on a Sanction List (namely any list of designated individuals as issued and amended from time to time by: (a) the U.S. government, including OFAC's list of Specially Designated Nationals and Blocked Persons (or "SDNs") and lists maintained by the U.S. Department of State; (b) the United Nations Security Council, (c) the European Union and any Member State (including the EU's consolidated list of persons subject to EU financial sanctions); and (d) the United Kingdom (including the consolidated list of</p>	<p>Europcar International, whose registered office is located in France at 13 Ter Boulevard Berthier, 75017 Paris, is the "Data Controller" of your Personal Data collected and processed in order to verify that you are not recorded on a Sanction List.</p> <p>This processing is based on our legal obligation to comply with above mentioned laws and regulations and based on our "legitimate interest" in ensuring that it and its subsidiaries are compliant with the International sanction</p>

<p>financial sanctions targets issued by the UK’s Office of Financial Sanctions Implementation (“OFSI”))</p>	<p>regime, as applying this regime is part of the applicable requirements to trade with some foreign countries.</p>
<p>Conducting satisfaction surveys to improve your experience with our products / services</p>	<p>This processing is based on our legitimate interest to have a better knowledge of its customers' needs and to improve its services and customer service.</p> <p>Europcar International, whose registered office is located in France at 13 Ter Boulevard Berthier, 75017 Paris, is the “Data Controller” of your Personal Data collected and processed for this purpose</p>
<p>Chatting in real time on our website.</p>	<p>This processing is based on our legitimate interest in answering users' questions about our products and services.</p>
<p>Conducting business development and marketing activities, including :</p> <ul style="list-style-type: none"> - sending emails and SMS notifications about special offers and promotions; - Recording your rental history to suggest our products and services to you when you search for new bookings or to send you special offers and benefits; - Sending emails about a booking we have not completed or about the status of your booking requests; - managing your loyalty program and membership card; - organizing contests and prize draws; - the management and updating of the prospect database. 	<p>Our commercial and marketing activities, i.e. the sending of commercial messages to promote our products and services (i to iv) are subject to your consent.</p> <p>In the event that you are already our customer, you may receive commercial messages for products and services similar to those we have already provided to you.</p> <p>The sending of these messages will be based on our legitimate interest in communicating about our products and services.</p> <p>Processing activities included in category (v) are based on our legitimate interest to simplify and speed up the reservation process for our customers.</p> <p>Processing activities included in category (vi) are based on our legitimate interest to manage our prospect database.</p> <p>Europcar International, whose registered office is located in France at 13 Ter Boulevard Berthier, 75017 Paris, is the “Data Controller” of your Personal Data collected and processed for this purpose</p>

<p>The management of fines for traffic offences, in particular for :</p> <ul style="list-style-type: none"> - transfer to the competent authority the identity of the main driver mentioned on the rental contract ; 	<p>This processing activity is based on our legal obligations</p>
<p>The management and maintenance of a list of clients with certain contractual risks, with regard to :</p> <ul style="list-style-type: none"> - payment incidents resulting in legal proceedings; - traffic accidents or repeated damage or incivilities towards our employees; - the use of our vehicles in violation of the general rental conditions. 	<p>This processing activity is based on our legitimate interest, in particular our interest in asserting our rights, to prevent risks and fraud related to the execution of your lease contract, to prevent and manage incivilities towards our employees.</p> <p>In this respect, we seek to maintain a fair balance between the need to process your Personal Data and respect for your rights and freedoms, in particular the protection of privacy. If you appear on this list of at-risk clients, your reservation request will be rejected. You may challenge this decision by sending an email to the following address: customerserviceitaly@europcar.com.</p>
<p>Video surveillance on our premises</p>	<p>This processing activity is based on our legitimate interest in ensuring the safety of property and persons in our stations, by a deterrent effect or in such a way as to be able to identify the perpetrators of damage, theft or aggression.</p>
<p>Data entry in the anti-fraud centralised database managed by ANIASA</p>	<p>This processing activity is based on our legitimate interest, in particular our interest in asserting our rights, (1) to protect corporate assets (theft prevention, misappropriation of car fleet); (2) to plan corporate strategies to reduce risks of criminal events; (3) to prevent repeated unlawful actions to the detriment of associate companies; (4) to conduct statistical analysis; (5) to exercise rights in legal claims; (6) to cooperate with public safety authorities.</p>
<p>Analysis of navigation data on our website and mobile applications</p>	<p>This processing is based on our legitimate interest in improving our products and services.</p> <p>Europcar International, whose registered office is located in France at 13 Ter Boulevard Berthier, 75017 Paris, is the “Data Controller”</p>

of your Personal Data collected and processed
for this purpose

4. Who are the recipients of your Personal Data?

4.1 Categories of recipients

If necessary, your personal data may be communicated:

- a. to our employees, our authorized representatives, other companies of our Group and our franchise network, our agents and intermediaries mandated to provide you with our products and services ;
- b. to our subcontractors, in particular our IT service providers for hosting, maintenance or development purposes, who assist us in providing you with our products and services or collection agencies which help us recover unpaid orders. These may be entities that are members of our Group or external service providers;
- c. to our insurance services companies to purchase and manage insurance for your vehicle;
- d. advertising agencies, marketing agencies, social networking and digital agencies to help us carry out advertising, marketing and sales campaigns and to analyze the effectiveness of these campaigns;
- e. concerning the information necessary for the processing of fines, to the competent authority or to its foreign counterparts in the case of fines committed abroad ;
- f. concerning the « fight against terrorism » to the Centro Elaborazione Dati of the Ministero dell'Interno (law 1 dec 2018, n. 132)
- g. on certain conditions, to ANIASA (National Association of the Car Rental Industry and Automotive Services) for the entry of the data in the centralized anti-fraud database;
- h. to our partners or those of our Group, in particular to enable you to collect loyalty points when you are a member of their program:

List of Europcar Italia partners: Trenitalia

List of Europcar Mobility Group partners:

1. AAdvantage
2. Accor Hotel
3. Aeroflot
4. Air Europa
5. American Express Rewards
6. Asia Miles
7. Biglife SDN BHD (Air Asia)

8. Delta Airlines
9. Ecos Mobility & Hospitality Private Limited
10. Emirates SkyWard
11. Finnair Plus
12. Fly SAS
13. Flying Blue
14. Gulf Air Falcon Flyer
15. Lufthansa
16. Melia Rewards
17. Miles & More
18. Oman Air Sindbad
19. Qatar Privilege Club
20. Radisson Rewards
21. Routes Car Rental
22. Royal Air Maroc
23. Shouqi Car Rental & Leasing Limited Liability Company
24. Silvercar
25. Singapore Krsiflyer
26. TAP Miles & Go
27. Times Mobility Co LTD
28. Turkish Airlines
29. Ubeeqo
30. UIA Panorama Club

We may also disclose your personal data in accordance with applicable laws and regulations to the relevant authorities.

Use of Facebook

All Facebook features and services available on our website or applications are governed by the Facebook Privacy Policy, which you can read for more information about your rights and settings options.

By using one of our website/applications, you can:

- Use Facebook social plug-ins, such as "like" or "share" our content on the Facebook Platform;
- Accept cookies from our website or applications (also known as "Facebook Pixel"), which will help us understand your activities, including information about your device, how you use our services, the purchases you make, and the ads you view, whether or not you have a Facebook account or are logged in to Facebook.

When you use these Facebook features, we collect data that helps us to:

- Display ads that may be of interest to you on Facebook (or Instagram, Messenger or any other Facebook service);
- Measure and analyze the effectiveness of our website, applications and advertisements.

4.2 International transfers

In order to provide you with our products and services, we may use service providers located outside the European Union (in particular in the United States, United Kingdom, Morocco and Israel). In the event that the vehicle is booked abroad, data transfers will be carried out in the country in question in order to provide you with our mobility solutions.

Depending on the assumptions, some recipients may be located in countries recognized by the European Commission as providing an adequate level of protection of personal data or in countries that have not been recognized by the European Commission as providing such a level of protection. In any case, we have implemented appropriate protection measures to protect your personal data in accordance with data protection regulations.

For more information about the countries to which your personal data may be transferred, their level of data protection and the potential protective measures implemented by EC, [click here](#).

5. How long do we keep your Personal Data?

Your personal data are kept for different periods of time, depending on the purposes of the processing concerned:

Purposes of the processing	Data retention periods
The creation and management of your customer account	For the duration of the business relationship and 5 years after the end of the business relationship.
The processing of your reservation and rental contract, in particular for : - Confirming, modifying or cancelling your reservation; - Communicate with you regarding your reservation and rental (for example, to provide you with	For 5 years after the end of the reservation

<p>information about your reservation and rental, to send you reminder notifications before you return your vehicle, to answer your questions or suggestions);</p> <ul style="list-style-type: none"> - manage your rental; - manage your payment and invoices; - manage the collection of sums due (including subsequent costs such as fines for traffic violations, or compensation for damage to the vehicle); - managing claims; - taking out and managing your vehicle insurance 	
<p>The management of commercial documents (customer invoices, purchase orders, certain electronically concluded contracts)</p>	<p>10 years</p>
<p>Credit card: fraud prevention, management of the collection of sums due</p>	<p>13 months from the effective payment</p>
<p>Verifying that you are not recorded on a Sanction List</p>	<p>For 5 years from the collection of your data</p>
<p>The improvement of our products and services according to your preferences by carrying out satisfaction surveys.</p>	<p>3 years from our last contact</p>
<p>Chatting in real time on our website.</p>	<p>3 years from our last commercial contact</p>
<p>Conducting business development and marketing activities, including :</p> <p>Sending emails and SMS notifications about special offers and promotions;</p> <p>Recording your rental history to suggest products/services to you when searching for new bookings or to send you special offers and benefits;</p> <p>sending emails relating to a booking that we have not completed or reporting the status of your booking requests;</p> <p>managing your loyalty program and membership</p>	<ul style="list-style-type: none"> - if you are a Europcar customer, 2 years from the end of the business relationship with ECI. - If you are not a Europcar customer, 2 years from the collection of your personal data OR from the last time you requested information from us.

card; organizing contests and prize draws; the management and updating of the prospect database.	
The management of fines, in particular for : - transfer to the competent authorities the identity of the main driver mentioned on the rental contract;	For the time necessary to identify the driver responsible for committing the offence giving rise to the contravention, which may not exceed 90 days from receipt of the contravention. However, relevant information may be retained for a longer period of time from receipt of the ticket, as part of an interim record keeping policy.
Management and updating of a list of clients with certain contractual risks, with regard to : - payment incidents resulting in legal proceedings; - traffic accidents or repeated damage or incivilities towards our employees; - the use of our vehicles in violation of the general rental conditions.	3 or 5 years from the date of creation or modification of the last rental and depending on the nature of the event
Data entry in the anti-fraud centralised database managed by ANIASA	The data contained in the database are kept exclusively for the time strictly necessary for the individual car rental company to clarify the position of the interested parties. However, relevant information may be kept for a longer period of time in the event of disputes.
Video surveillance on our premises	7 days
Analysis of navigation data on our website and mobile applications	See cookies policy

6. What rights can you exercise regarding the processing of your Personal Data?

Within the limits and conditions allowed by the regulations in force, you can:

- **access** to your Personal Data and obtain further information on the characteristics of the processing we

carry out;

- have your Personal Data **corrected, updated and deleted**, it being specified that deletion can only be carried out when (i) the data is no longer necessary in relation to the purposes for which it was processed, (ii) you withdraw your consent and there is no other legal basis for the processing, (iii) you object to the processing of your personal data and there is no compelling legitimate reason for the processing (iv) it has been established that your personal data has been processed unlawfully, (v) the personal data must be deleted in order to comply with one of our legal obligations

- you **object** to the processing of your Personal Data for your own reasons

- you **object** to the processing of your Personal Data for commercial prospecting purposes

- **receive** the personal data you have provided us with or request us to pass them on to a third party when the processing of your personal data (i) has been carried out by automated means and (ii) is based on your consent or on the execution of a contract binding us

- **request the limitation** of the processing of your Personal Data, which means that we will not be able to use your Personal Data for a defined period of time. You can exercise this right when:

a) you dispute the accuracy of your personal data for a period of time that allows us to verify the accuracy of your personal data;

b) the processing of personal data is unlawful and you object to the deletion of your personal data and instead demand that its use be restricted;

c) we no longer need your Personal Data but they are still required for the establishment, exercise or defence of legal claims;

d) you object to the processing for reasons relating to your particular situation, while we are checking whether the legitimate reasons pursued by Europcar Italia S.p.A. take precedence over your own.

- **withdrawing your consent** to treatment based on your consent

- **submit a complaint** to a Supervisory Authority. In Italy, the [Supervisory Authority is Garante per la Protezione dei Dati Personali \(www.garanteprivacy.it\)](http://www.garanteprivacy.it)

7. How do you exercise your rights?

If you would like to know more about the provisions of this privacy policy or to contact our Data Protection Officer, you can also write to us at the following address

Responsabile della Protezione dei Dati, Europcar Italia S.p.A, Piazzale dell'Industria 44/46, 00144 Roma

or by e-mail to: dpo@europcar.com

To exercise your rights, you must prove your identity by clearly indicating your surname, first names, driver ID and any useful information enabling us to identify you (such as the place and date of your last vehicle rental). You must also give us the e-mail address or the physical address to which you would like the reply to be sent to you.

8. How do we protect your Personal Data?

Europcar is committed to protecting the information it collects through this website.

In particular, ECI uses appropriate physical, technical and organizational security measures to prevent unauthorized or unlawful processing, accidental loss of or destruction of or damage to your personal data.

Europcar's systems are configured with data encryption, or scrambling technologies, and industry-standard firewalls. When you send personal information to a Europcar website over the Internet, your data is protected by "Transport Layer Security" (TLS) technology to ensure safe transmission.

Any credit card transaction you make through Europcar websites is done through our secure server technology. This technology notably:

- a) assures your browser that your data is being sent to the correct computer server, and that the server is secure;
- b) encodes the data, so that it cannot be read by anyone other than the secure server;
- c) checks the data being transferred to ensure it has not been altered.

9. What rules apply to the processing of your Personal Data when you click on links placed on our website, redirecting to our partners' or other sites?

On this site you will find various links to the websites of our partners (e.g. for travel services). We would like to draw your attention to the fact that this Privacy Policy does not apply to the processing of your Personal Data by our partners or other third parties, which may occur when you visit their websites, and that we are not responsible for such data processing. If you would like information on how these partners and third parties process your personal data, we invite you to consult their Privacy Policies.

10. Changes to this Privacy Policy

This Privacy Policy was last updated on 29/09/2021