

## Privacy Policy - Overview

### Your Privacy

We respect your privacy and are committed to protecting the personal data we hold about you. This policy explains what data we collect about you, how we collect it, the measures we take to keep your data secure and the uses and disclosures we make of it. We also explain the options you have regarding your personal data.

When you request services from us, access our websites, utilise our mobile “apps” or otherwise interact with us, for example, but without limitation, through our in-resort offices, our official corporate pages on third party social networks (such as Facebook) or any “apps” on those pages, you consent to our collection, retention and use of your personal data in the manner described in this policy.

We will aim to keep your data safe, secure and private and allow you to review your marketing choices at any time.

### Scope

#### Who We Are:

We are VDL Car Hire

#### Legal Issues:

We aim to comply with the privacy laws applicable to the personal data we collect and use.

#### Changes:

We may change this policy from time to time.

### Collection

#### What We Collect:

We collect the personal data we need to provide the services you request from us, for our operational uses and disclosures (see below) or for such other purposes as you authorise.

#### Sources:

We mostly collect your data directly from you, through various channels and from companies involved in our provision of services to you.

#### Websites:

Certain technologies are used on our websites, our apps and other ecommerce media including cookies, to collect data about your visit to our site and sites upon which we advertise. You may choose to restrict the use of cookies as suggested in this policy

### Retention

#### Storage:

We generally retain personal data about our customers for as long as we believe appropriate for the purposes for which it was collected.

#### Security:

We aim to maintain appropriate physical, procedural and electronic safeguards to protect your personal data.

**Access and Correction:**

You may request the personal data we retain about you to review and inform us of any factual errors to correct.

**Uses and Disclosures****Operational Uses:**

By providing your personal data to us, you consent to our use and disclosure of your data for the operational purposes listed in this policy.

**Marketing Uses:**

We would like to use your personal data for our marketing purposes. You can choose to restrict or "opt out" of this use by following the instructions in this policy.

**Contact Us:**

We hope this policy answers your questions about our collection, use and disclosure of your personal data. If it does not, or if you have any questions, please contact us by following the instructions in the Contact Us section below.

# Privacy Policy

## Your Privacy

We respect your privacy and are committed to protecting the personal data we hold about you. This policy explains what data we collect about you, how we collect it, the measures we take in our efforts to keep your data secure and the uses and disclosures we make of it. We also explain the options you have in relation to your personal data.

When you request services from us, operate a vehicle or equipment with in-vehicle or in-equipment technology, access our websites, utilise our mobile “apps” or otherwise interact with us, for example, but without limitation, through our in-resort offices, our official corporate pages on third party social networks (such as Facebook) or the “apps” on those pages, you consent to our collection, retention and use of your personal data in the manner described in this policy.

## Scope

This policy covers the personal data we collect about you in connection with our vehicle and bike rental business and transfer business which identifies you as an individual.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information.

It does not apply to data that does not personally identify you as an individual

## Services We Provide

We provide vehicle hire and equipment (such as, but not limited to, car seats and satellite navigation systems), bike hire and equipment (such as, but not limited to, helmets and locks) and transfer services.

## Changes

We may change this policy from time to time. If we do so, the amended policy will take effect when we post it on the applicable website(s), mobile “apps” or our third party social network page(s). Whenever we make a change, we will amend the “last updated” notice under the “Scope” heading in the “Overview” section above.

If any change makes the policy less protective of your personal data, such change will not apply to data we collected about you before the change was made. The only exception to this is, unless legally prohibited, where we have provided you with notice about the changes and given you the opportunity to tell us not to apply them to your personal data.

## Collection

We collect a range of data about you from a variety of sources for the purposes of our business. The examples we provide here are illustrative rather than a complete list of our practices.

## What We Collect

We collect the personal data and the non-personal data we need to process your reservation requests and to provide the services you request from us and for our operational uses in connection with such services. The reasons we collect this personal data are for the purposes of fulfilling contracts, our legitimate interests, our legal duty and your consent in respect of marketing activities. The data which we may collect includes but not limited to:

- Name, address and contact details, including telephone and mobile number, and email address;
- Date of birth, passport number and driver's license number and, upon our request, a copy of your driver's license;
- The age of children when providing child, booster or baby seats;
- Accidents, claims or motoring convictions over the past 3 years;
- Loyalty programme information (if applicable);
- Membership of resorts or ownership of property within resorts;
- Location data such as geographic location of electronic devices used to contact us or to access our mobile "apps" or of the vehicle or equipment you have rented;
- Information regarding the vehicle or equipment rented and its operation during your rental;
- Rental charges you incur and other information relating to your transactions;
- Itinerary information, including airline, flight information or transfer locations.

We do not collect certain personal data that constitutes sensitive data in some countries, such as data about health conditions or membership of a trade union.

## Sources

We collect personal data directly from you in connection with a reservation (even an abandoned or interrupted reservation), a rental of a vehicle / bike or equipment, a transfer, or your membership in any of our partners membership programs, including information you provide:

- When you call our reservation, customer service, emergency road-side assistance;
- On our websites;
- Through our in-resort offices;
- On our mobile "apps";
- On our official third party social network pages;
- Through your computer's web browser;
- At rental locations;
- Through our in-vehicle or in-equipment technology or through other telematic devices;

We also gather personal data about you from a variety of other sources, which may include:

- Reservations you make with us through resorts, travel agents or brokers;
- Transactions you complete with us, including options you take, charges you incur and any incidents or accidents that may occur;
- Other companies that have business relationships with us, such as, affiliates and business partners, including airlines, hotels and insurance companies.

## Websites

### Our Websites

Certain technologies are used on our websites and on mobile devices to collect data about your visit or usage, as follows:

## Cookies

A “cookie” is a set of data sent to your computer or mobile device by a web server that enables the server to recognise your computer or mobile device.

Cookies help improve the quality of your visits to websites, for example, but not limitation, by making the reservation process faster and smoother. The information the cookies provide helps in the development of content and features that may be of interest to you.

### We use cookies to:

- Track your use of our websites during a single visit, remember the data you provide and the choices you make as you progress from page to page (“session cookies”); and
- Recognize you at your next visit (“persistent cookies”).

Third party cookies may also be used on our websites for the purpose of:

- Facilitating business transactions with or through such third parties.

*More about cookies...*

*By adjusting your browser or installing certain software, you can restrict our use of cookies. If you do this, you should be aware of the following:*

- *If you restrict our use of session cookies you will not be able to use our websites or certain features of our email messages. You should be aware that session cookies are generally deleted or made unavailable to us as soon as you close your browser.*
- *If you restrict our use of persistent cookies you may still enjoy the full workings of our websites and email messages but will need to re-enter some data when starting a new website session. Although persistent cookies will neither automatically be erased nor made unavailable to us upon closing your browser, they will typically “expire” after a number of years.*

*If you are still unsure about cookies, please note that our cookies are unable to retrieve other data from your computer's hard drive or pass on computer viruses.*

## Third Party Providers

Adwords use cookies and collect data for marketing activities. Adwords cookies contain no personally identifiable information other than the IP Address. They also collect web requests, browser type, browser language, the date and time of your request.

VDL uses Social Media plugins for networks such as Facebook and Google. Our website contains social media plugins. No personal data is forwarded unless the plugins are used. If the plugin buttons are used, the social network selected receives data transmitted, such as your IP-address.

VDL has no influence on the data, which is collected by social networks. Please visit the respective social network to get an overview of their data privacy policy.

## Other Company Websites

Our websites and email messages may contain links to websites operated by other companies. You should be aware that the collection, retention and use of any data you provide on these websites will be governed by the privacy policy of the company providing the website and not by this policy.

## Retention

Our aim is to ensure that the personal data we retain about you is stored securely and, in light of the information provided to us, is as accurate, current, complete and relevant as necessary for the purposes for which we use and disclose it.

## Storage

We generally retain personal data about our customers for as long as we believe appropriate for the purposes for which it was collected or as otherwise required or authorised by applicable law.

## Security

As you may be aware, there is no completely secure method of transmitting or storing data. Although their physical characteristics are different, postal mail, telephone calls, text messages, faxes and

transmissions over the Internet or wireless networks all present possibilities of loss, misrouting, interception and misuse of the data that is transmitted.

We take commercially reasonable measures to protect against the loss, misuse and unauthorised access or disclosure, alteration and destruction of your personal data by aiming to maintain appropriate physical, procedural and electronic safeguards to protect your personal data, including:

- Restricting access to personal data to our employees or service providers where required to perform the services and operational duties;
- Enforcing policies and procedures for our employees in their handling of personal data; and
- Using technologies designed to safeguard data during its transmission, such as SSL encryption for the data you provide on our websites.

If you have reason to believe that any account with us is no longer secure, you must immediately contact us by following the instructions at the end of this policy.

*More about SSL encryption...*

*"SSL" stands for Secure Sockets Layer encryption. We use this protection when you submit personal data to us on our websites. SSL encryption seeks to ensure that you are actually sending your data to us and that no-one else can read or tamper with it during transmission.*

*When you are asked to provide your personal data to us on our website, you will see that our "http" website address changes to read "https". The additional "s" denotes that the site is secure for that data transfer. You may also see a closed padlock symbol on your screen, again denoting a secure site.*

## Security of Communications

We try to strike a balance between the security of your data and your convenience. As a result, we may sometimes use a method of communication that is less secure than a less convenient alternative.

For example, but not limited to, we will send you an email or a text message in unencrypted form (i.e. instantly readable) because many of our customers are unable to access encrypted (i.e. coded) email or messages. This means that our message, if misrouted or intercepted, could be read more easily than encrypted messages. For this reason, please do not include confidential information, such as your credit card number or account passwords, in any email or text you send to us or on any posting you make to a public area of a third party social network page, especially since any such posting immediately becomes public.

## Access and Correction

You may contact us to obtain your personal data to review, request changes to it and correct factual errors.

To protect your privacy and the security of your personal data, we will take steps to verify your identity before providing or confirming any personal information we hold about you. You may then request any corrections to the data we store about you.

For details on how to contact us please see 'Contact Us' section below.

## Uses and Disclosures

Your personal data will not be used in a way that is incompatible with the purpose for which it was collected or as authorised by you. In that regard by making a reservation with us or renting a vehicle or bike from us or using our transfer services, you consent to our use and disclosure of your personal data for the operational uses listed below which may include disclosure of your data outside your country of residence. We would also like to use your data for our marketing purposes.

## Operational Uses and Disclosures

The examples provided below are illustrative and not a complete list of our practices:

### To provide you with services

We will share your personal data among ourselves and other companies to provide services to you, including to:

- Make your rental reservations;
- Process and/or confirm your transactions;
- Provide you with the services you have requested;
- Provide you services in connection with your rental, such as navigation assistance or itinerary planning;
- Provide you with customer assistance, including, but not limited to, assistance after you have initiated but not completed a reservation;
- Invoice and collect amounts owed in connection with your rentals; and
- For customer satisfaction and market research purposes and to otherwise help us improve our services.

### To Communicate With You

We may use your personal data to communicate with you regarding:

- Any reservation you initiate for any of our services.

So that we may communicate with you, you give us your consent to call you, email you or send you text messages to your mobile telephone/device. We will not charge you for such calls, emails or texts. If replying to telephone calls or text messages your mobile service provider will charge you according to the applicable plan to which you subscribe.

### Disclosure to Companies You Use

We will also share your information with companies you use in connection with your rental, including:

- Your credit card provider and other companies that process your charges;
- Any company or organisation that is paying all or part of your rental charges;
- Any intermediary you use, such as a travel agent or broker, in relation to any aspect of your rental; and
- Any fines or unpaid toll charges.

### Protective and Legal Uses

We may use, share and disclose your personal data for legal reasons as we believe necessary or appropriate, including:

- Under applicable law, including laws outside your country of residence;
- To process, handle or otherwise respond to claims for damages, including claims or demands for bodily injury or property damage;
- To comply with legal process;
- To respond to requests from public and government authorities including public and government authorities outside your country of residence;
- To enforce our terms and conditions;
- To recover our vehicles, equipment or any monies due, such as through debt collection agencies;
- To protect our operations or those of any of our subsidiaries;
- To protect our rights, privacy, safety or property, and/or that of our subsidiaries, you or others; and
- To allow us to pursue available remedies or limit the damages that we may sustain.

### Disclosure to Our Service Providers

We may use other companies as our service providers to act on our behalf and assist us in the conduct of our business, performing services for us under our instruction. These services may include hosting certain websites or databases or sending marketing communications. We will seek to require our service providers and agents to maintain appropriate security standards to protect your personal data and use the personal data we provide to them only for the purposes we specify.

### **Disclosure for Corporate transactions**

We may disclose your personal data to a third party in connection with any contemplated or actual reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

### **Marketing Uses and Disclosures**

We may aggregate your personal data and use it to develop marketing programs and service offerings that we believe may be of interest to you. We would like to send these to you by email, by text message or by mail. You have choices in relation to our marketing uses of your personal data.

#### **Marketing**

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us and data we collect when you use our services, or from our third-party partners.

We study this to form a view on what we think you may want or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time.

#### **Alternative Opportunities to Opt-out**

Our marketing emails contain an unsubscribe option. If you do not want us to continue to send marketing emails to your email address, click on 'unsubscribe' and we will not send further marketing emails to that address, although you may still receive emails at other addresses for which you have not unsubscribed.

#### **Important Points to Note**

Please note the following points about the marketing choices you make:

- If you change your marketing choices, we will observe your most recent choice.
- If you change your contact details such as email or postal address you must notify us.

### **Contact Us**

We hope this policy answers your questions about our collection, use and disclosure of your personal data. If you have additional questions or want to contact us for a specific purpose, please select from the following:

Request for personal information held: Please send any request to [customerservices@vdlcarhire.com](mailto:customerservices@vdlcarhire.com)

#### **Complaints and Other Questions:**

You should send any questions you may have about this policy or any complaints you have about how we have handled our personal data to the contact address below. If you feel our response is not satisfactory, we may refer you to a neutral and independent dispute resolution organisation, where available.

Please send to [customerservices@vdlcarhire.com](mailto:customerservices@vdlcarhire.com)