



# PRIVACY POLICY

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# Thank you for renting with Europcar

## 1. Who processes your Personal Data?

Europcar Group UK Limited, whose registered office is 1 Great Central Square, Leicester, LE1 4JS, United Kingdom (hereinafter referred to as “we”, “us” or “our(s)”) is the “Data Controller” of your Personal Data collected and processed via this website, our mobile applications, our rental stations or through any other contact you may have with us in order to offer you mobility solutions and services.

The terms “Europcar”, “we”, “us” or “our” that we use in this policy refer to **Europcar Group UK Limited**. In accordance with the applicable regulations on the protection of personal data, Europcar Group UK Limited is the “Data Controller”.

Europcar Group UK Limited is a member of the Europcar Mobility Group. The term “our Group” 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, date of birth, 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 invoices;
- As the case may be, data relating to traffic violations or other fines and penalties;
- Information about your flight in the event that the pickup location of your vehicle is an airport;
- Information on your vehicle reservation, in particular for the management of any loyalty programs;
- 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 email, 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, tyre 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 at:

<https://www.europcar.com/files/live/sites/erc/files/connected-cars/privacy-policy.pdf>; and

- 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 Personal 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 basis:

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.
<p>The management of your reservation and rental contract, in particular for:</p> <ul style="list-style-type: none"> <li>- confirming, modifying or cancelling your reservation;</li> <li>- 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 notifications before you return your vehicle, to answer your questions or suggestions);</li> <li>- manage your rental;</li> <li>- manage your payment and invoices;</li> <li>- manage the collection of amounts due, including costs such as fines for traffic violations; damage to the vehicle or compensation for damage to the vehicle);</li> <li>- managing any claims;</li> <li>- purchase and manage insurance for your vehicle.</li> </ul>	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 future bookings.
Fight against credit card fraud	This processing is based on our legitimate interest in protecting ourselves against credit card fraud.
<p>Fight against fraud and other criminal activity.</p> <p>We may obtain information about you from credit reference agencies, insurance data sources (including the Claims Underwriting Exchange and MIB) and fraud prevention agencies to assess creditworthiness and prevent fraud and other criminal activity. This information may include a search that will appear on your credit report and be visible to other credit providers. Please see section 4 for further details of the agencies and databases we access or contribute to and how this information may be used. Further information is available on request</p>	This processing is based on our legitimate interest in protecting ourselves against fraud and other criminal activity relating to the rental and use of our vehicles.
Conducting satisfaction surveys to improve your experience with our products / services	This processing is based on our legitimate interest to improve our knowledge of our customers' needs and to improve our services and customer service.
Chatting in real time on our website.	This processing is based on our legitimate interest in answering website users' questions about our products and services.
<p>Conducting business development and marketing activities, including :</p> <ul style="list-style-type: none"> <li>- sending emails and SMS notifications about special offers and promotions;</li> <li>- 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;</li> <li>- managing your loyalty program and membership card; <ul style="list-style-type: none"> <li>- organising contests and prize draws;</li> </ul> </li> <li>- sending emails about a booking we have not completed or about the status of your booking requests;</li> <li>- the management and updating of the prospect database</li> </ul>	<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>The management of fines and penalties, in particular for:</p> <ul style="list-style-type: none"> <li>- the transfer of information to the police or other enforcement agencies or issuing authorities to enable them to identify the driver (or potential driver) of our vehicle in the event of a driving offence or suspected driving offence;</li> </ul>	This processing activity is based on our legal obligations, in particular our obligation under legislation such as the Road Traffic Act 1988 and/or other similar legislation.

<p>The management and maintenance of a list of customers presenting certain risks to our business and/or staff, with regard to :</p> <ul style="list-style-type: none"> <li>- payment incidents resulting in legal proceedings;</li> <li>- traffic accidents or repeated damage;</li> <li>- inappropriate or abusive conduct towards our employees or our customers;</li> <li>- the use of our vehicles in violation of the general rental conditions including the use of our vehicles for criminal or alleged criminal activity.</li> </ul>	<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 contract and to prevent and manage abusive behaviour 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 customers, your reservation request will be rejected. You may challenge this decision by sending an email to the following address: <b>uk.security@europcar.com</b></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 Branches, by a deterrent effect or in such a way as to be able to identify the perpetrators of damage, theft or aggression.</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>Assess eligibility; prevent bad debts and fraud</p>	<p>We will carry out a soft credit check with the credit reference agency Experian to (i) verify your identity; (ii) help us ensure that you meet our eligibility criteria by having the capacity to pay in full the fees under the vehicle rental contract (and any associated charges); and (iii) prevent fraud and other criminal activity.</p> <p>We will use credit scoring and an automated decision-making process to make this eligibility assessment. This soft credit check does not affect your credit score and it will not appear as a visible search on your credit report.</p> <p>The underlying information about your credit history is held by Experian. See <a href="https://www.experian.com/blogs/ask-experian/what-is-a-soft-inquiry/">https://www.experian.com/blogs/ask-experian/what-is-a-soft-inquiry/</a> for more information about soft credit checks. You can access your credit file by contacting Experian on 0800 013 8888. Experian's Privacy Policy can be found at: <a href="https://www.experian.co.uk/consumer/privacy.html">https://www.experian.co.uk/consumer/privacy.html</a> and you can contact their Data Protection Officer at <a href="mailto:uk.dpo@experian.com">uk.dpo@experian.com</a>.</p> <p>If we decline your application to rent a vehicle on the basis of the eligibility check you will be notified of this and of your entitlement to make representations to Europcar and how to contest the decision. You have a number of privacy rights (as set out in section 6) including the right to object to the use of your data when it is processed on the basis of legitimate interests. See section 7 for details of how to contact Europcar to exercise your privacy rights.</p> <p>If you have questions about the soft credit check process including our affordability criteria which are used to make eligibility decisions, please contact our Customer Qualification Team at <a href="mailto:uk.qualification@europcar.com">uk.qualification@europcar.com</a>.</p> <p>A Decline decision does not affect your ability to rent a car with another rental company or your ability to rent a car with Europcar at a future date.</p> <p><b>Legal basis of the processing:</b> This processing is based on: (a) our legitimate interests in (i) protecting ourselves against bad debtors and fraud relating to the rental and use of our vehicles; and (ii) to protect consumers by preventing over-indebtedness; and (b) contractual necessity, in order to deliver the contractual services.</p>

#### 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 authorised representatives, other companies within 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 sums. 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 analyse the effectiveness of these campaigns;
- e. to law enforcement bodies (and their foreign counterparts in the case of offences committed abroad) and other public and private sector bodies for the purposes of dealing with alleged or actual road traffic or driving offences and/or associated fines; and private parking companies dealing with alleged or actual breaches of contract;
- f. for the management and updating of the list of persons presenting certain contractual risks, to the vehicle rental industry generally and its staff. The register is managed by our trade association the British Vehicle Rental and Leasing Association (BVRLA). For more details visit [www.bvrla.co.uk](http://www.bvrla.co.uk).
- g. to companies providing operational support to our business including authentication of you, your driving licence and driving history (including, but not limited to, the DVLA and Synectics Solutions Limited);
- h. to our partners or those of our Group that enable you to collect loyalty points when you are a member of their program:

List of Europcar Mobility Group's partners:

- AAdvantage
- Accor Hotel
- Aeroflot
- Air Europa
- American Express Rewards
- Asia Miles
- Biglife SDN BHD (Air Asia)
- Delta Airlines
- Ecos Mobility & Hospitality Private Limited
- Emirates SkyWard
- Finnair Plus
- Fly SAS
- Flying Blue
- Gulf Air Falcon Flyer
- Lufthansa
- Melia Rewards
- Miles & More
- Oman Air Sindbad
- Qatar Privilege Club
- Radisson Rewards
- Routes Car Rental
- Royal Air Maroc
- Shouqi Car Rental & Leasing Limited Liability Company
- Silvercar
- Singapore Krisflyer
- TAP Miles & Go
- Times Mobility Co LTD
- Turkish Airlines
- Ubeeqo
- UIA Panorama Club

List of Europcar Group UK partners:

- Nectar 360 Limited

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 help 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.

#### Full Credit Check

If you fail to pay the rental charges to Europcar (or any applicable additional charges such as for vehicle damage) within 28 days of the debt becoming due or you do not agree to the terms of a payment plan with Europcar, your payment performance data relating to the outstanding debt will be shared with Experian in accordance with standard industry practices. A full credit check will be carried out in such circumstances with credit reference agencies, see section 2.2.3.2 of the terms and conditions of hire for more information.

#### 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, 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:

<https://www.europcar.com/files/live/sites/Europcar/files/Privacy%20Policy/List%20of%20intra-group%20recipients%20of%20personal%20data%20for%20Europcar%20entities.pdf>

## 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.
<p>The processing of your reservation and rental contract, in particular for:</p> <ul style="list-style-type: none"> <li>- Confirming, modifying or cancelling your reservation;</li> <li>- Communicating with you regarding your reservation and rental (for example, to provide you with information about your reservation and during your rental, to send you reminder notifications before you return your vehicle, to answer your questions or suggestions);</li> <li>- manage your rental;</li> <li>- manage your payment and invoices;</li> <li>- manage the collection of sums due (including subsequent costs such as fines for traffic violations, or compensation for damage to the vehicle);</li> <li>- managing claims;</li> <li>- taking out and managing your vehicle insurance</li> </ul>	For 5 years after the end of the reservation.
Monitoring of Connected Vehicles	The data are kept for a period of 12 months. In the event of damage or offences against property, investigation of damage and accidents caused to the vehicle, Personal Data may be retained until the cases are resolved (including until the closure of any legal or judicial proceedings).
Verifying your identity and to carry out credit and fraud prevention checks prior to releasing a vehicle to you at the start of the rental and where subsequently required	13 months from the effective payment
Fight against fraud and other criminal activity	<p>For the duration for which the risk exists which may in some cases be indefinitely where fraud or criminal activity has been identified.</p> <p>Where no fraud or criminal activity is identified the data is subject to the retention periods as set out in this section 5.</p>
The improvement of our products and services according to your preferences by carrying out satisfaction surveys.	3 years from our last contact
Chatting in real time on our website.	3 years from our last commercial contact
<p>Conducting business development and marketing activities, including:</p> <ul style="list-style-type: none"> <li>- Sending emails and SMS notifications about special offers and promotions;</li> <li>- Recording your rental history to suggest products/services to you when searching for new bookings or to send you special offers and benefits;</li> <li>- sending emails relating to a booking that we have not completed or reporting the status of your booking requests;</li> <li>- managing your loyalty program and membership card;</li> <li>- organising contests and prize draws;</li> <li>- the management and updating of the prospect database.</li> </ul>	<ul style="list-style-type: none"> <li>- if you are a Europcar customer, 3 years from the end of the business relationship with EC.</li> <li>- If you are not a Europcar customer, 3 years from the collection of your Personal Data OR from the last time you requested information from us.</li> </ul>
<p>The management of fines, in particular for:</p> <ul style="list-style-type: none"> <li>-the transfer of information to the police or other enforcement agencies or issuing authorities to enable them to identify the driver (or potential driver) of our vehicle in the event of a driving offence or suspected driving offence;</li> </ul>	<p>For the time necessary to identify the driver responsible for committing the offence giving rise to the contravention, which should not exceed 45 days from receipt of the contravention. However, relevant information may be retained for a longer period of time from the receipt of the request, for reasons of archiving.</p>

<p>The management and maintenance of a list of customers presenting certain risks to our business and/or staff, with regard to:</p> <ul style="list-style-type: none"> <li>- payment incidents resulting in legal proceedings;</li> <li>- traffic accidents or repeated damage</li> <li>- inappropriate or abusive conduct towards our employees or our customers;</li> <li>- the use of our vehicles in violation of the general rental conditions including the use of our vehicles for criminal or alleged criminal activity.</li> </ul>	<p>3 or 5 years from the date of creation or modification of the last rental and depending on the nature of the event</p>
<p>Video surveillance on our premises</p>	<p>No more than a month.</p>
<p>Analysis of navigation data on our website and mobile applications</p>	<p>Please, refer to our Cookie Policy which can be found at <a href="https://www.europcar.co.uk/cookie-policy">https://www.europcar.co.uk/cookie-policy</a></p>

## 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** your Personal Data and obtain further information as to 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 based on legitimate interest, which you can check by taking a look at the table shown in part 3 of this Privacy Policy ("For what purpose do we process your Personal Data") and in particular the column entitled "Legal basis of the processing"
- 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 we pursued by Europcar Group UK Limited take precedence over your own.
- **withdrawing your consent** to treatment based on your consent
- **submit a complaint** to a Supervisory Authority. In England, the Supervisory Authority is the Information Commissioner's office at <https://ico.org.uk/>.

## 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:

Director of Legal Services, Europcar Group UK Limited,  
1 Great Central Square, Leicester LE1 4JS

or by e-mail to: [dpo@europcar.com](mailto: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 you exercise your rights?

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

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

Europcar Group UK Limited's systems are configured with data encryption, or scrambling technologies, and industry-standard firewalls. When you send personal information to a Europcar Group UK Limited 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 Group UK Limited 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 1 September 2023.