

# Personal Data Policy

We are First Rent A Car Finland Oy, organisation no. 0744711-2 (“**the Company**”), and the personal data controller responsible for processing your personal data. We operate a Finnish vehicle hire company under the **HERTZ** brand. All references in this policy to “we”, “us” and “our” refer to the Company.

This is a concise summary which explains how we collect, process, protect and otherwise make use of data about you, and your rights regarding this data. For more detailed information, please see the **full policy** below.

<p><b>COLLECTION</b></p> <ul style="list-style-type: none"><li>▪ We may collect data about you through a number of different methods, including but not limited to rental locations, kiosks, telephone calls, communications with customer service, mobile apps, websites, rental vehicles and other sources, including third-party suppliers and business partners.</li><li>▪ We collect data such as name, address and payment card information from customers during the booking process and rental transaction.</li><li>▪ To the extent that you allow, we make use of cookies and other electronic tools to collect statistical information about how you use our website.</li></ul>	<p><b>PURPOSES</b></p> <ul style="list-style-type: none"><li>▪ Data that you provide will be used to render you the services you request.</li><li>▪ We will use the contact details you provide to communicate with you to render these services.</li><li>▪ We may use your contact details to send information regarding our services, if you consent to this.</li><li>▪ We use personal information for our own analytic purposes and to enable us to help our customers by improving our services and website.</li></ul>
<p><b>TRANSFER</b></p> <ul style="list-style-type: none"><li>▪ We may provide your data to selected third-party suppliers.</li><li>▪ We do not sell your data to unrelated third parties, but may, with your consent, share your data with third-party partners for marketing purposes.</li><li>▪ Your data may be transferred outside of your country of residence to countries such as the United States for processing and storage in accordance with applicable law.</li><li>▪ Your data may be transferred outside of your country of residence to provide services you have requested.</li></ul>	<p><b>STORAGE PERIOD AND SECURITY</b></p> <ul style="list-style-type: none"><li>▪ We take reasonable steps to protect personal data from theft, unauthorised use, disclosure or modification.</li><li>▪ We strive to maintain appropriate technical and organisational security procedures to protect your personal data.</li><li>▪ We generally retain customer information for as long as necessary to fulfil the purpose for which the data was collected, or as permitted or required by law.</li></ul>
<p><b>YOUR RIGHTS</b></p> <ul style="list-style-type: none"><li>▪ You have the right to access, review and update the data we hold on you.</li><li>▪ Under special circumstances, you may also request the correction or deletion of your personal data, or that we restrict our processing, or object to certain types of processing.</li><li>▪ We will do our best to honour your request, but reserve the right to impose certain restrictions and requirements.</li><li>▪ Wherever we use consent as a basis for processing, you may always withdraw your consent.</li></ul>	<p><b>QUERIES AND AMENDMENTS</b></p> <ul style="list-style-type: none"><li>▪ If you have any questions or concerns about how we process your personal data, you can contact us using the method set out in the full policy.</li><li>▪ We may amend this policy at any time, although amendments will not apply retroactively.</li><li>▪ We will notify you on our website when we make substantial amendments.</li><li>▪ This policy was last updated on <b>24 May 2018</b>.</li></ul>

# Personal Data Policy

## 1. Preamble

We are First Rent A Car Finland Oy, organisation no. 0744711-2 (“**the Company**”), and the personal data controller responsible for processing your personal data. We operate a Finnish vehicle hire company under the **HERTZ** brand. All references in this policy to “we”, “us” and “our” refer to the Company. You can find our contact details at the end of this policy.

We respect your privacy and endeavour to protect your personal data. Among other things, this policy explains the purposes for which we process your personal data, who we share it with and what rights you have with regards to your personal data.

## 2. Scope of this personal data policy

This policy covers the Company’s processing of our customers’ personal data in connection with the rental of vehicles. We use a network of licensees in connection with our services which are all independent companies. **We are therefore not responsible for our licensees’ processing of your personal data or that of other third parties with whom you may come into contact.**

## 3. What categories of personal data do we process and for which purposes, and on what legal grounds do we base our processing of your personal data?

The Company processes the following categories of personal data in the ways and for the purposes stated in the tables below.

The Company processes your personal data for the purposes stated in the tables below. For each purpose, the Company must base its processing on legal grounds. Legal grounds may include (i) your consent to specific processing; (ii) that the processing is necessary to fulfil an agreement to which you are party, or (iii) through a balance of interests where the Company or a third party has a legitimate interest that takes precedence over your interest in your personal data not being processed. In the tables below, the legal grounds on which the Company bases its processing are given for each particular purpose, as well as how long we will retain your data.

Purpose	Processing	Categories of personal data
Managing bookings and vehicle rental.	<ul style="list-style-type: none"> <li>▪ Delivery (including notifications and communications regarding delivery).</li> <li>▪ Identity and driving licence checks when renting out vehicles.</li> <li>▪ Credit information to ensure the driver’s ability to pay.</li> <li>▪ Payment management (including analysing possible payment solutions, which may involve checking payment history and retrieving credit information).</li> <li>▪ Adaptation of vehicles in accordance with customer requirements.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Name.</li> <li>▪ Personal ID number.</li> <li>▪ Driving licence and driving licence number.</li> <li>▪ Contact details (e-mail address, mobile number, address).</li> <li>▪ Payment information (credit card number, transaction amount, pre-authorisation of amount on credit card).</li> <li>▪ Copy of identification document (driving licence, driving licence number).</li> <li>▪ Credit information from credit agencies.</li> <li>▪ Payment history.</li> <li>▪ Rental information (which vehicle was hired out, which geographical areas the vehicle may be</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Checks of vehicle gauge readings before and after vehicle handover.</li> <li>▪ Managing complaints and warranty issues.</li> <li>▪ Checks for congestion charges or bridge tolls incurred during the rental period.</li> </ul>	<p>used in, vehicle collection and return location, any restrictions on its use such as a ban using the vehicle for towing other vehicles, which requests for additions and adaptations have been made by the customer, such as a car seat).</p> <ul style="list-style-type: none"> <li>▪ Where applicable, employer's name and address.</li> <li>▪ Information on mileage and fuel consumption.</li> <li>▪ GPS position (only in relation to congestion charges and bridge tolls).</li> </ul>
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**Legal grounds:** *Fulfilment of the rental agreement.* This collection of your personal data is required so we are able to fulfil our obligations under the rental agreement with the customer.

**Storage period:** For the duration of the rental agreement and for a period of three years thereafter in order to be able to deal with any claims issues, as well as for the period necessary to establish, assert or defend legal claims.

Purpose	Processing	Categories of personal data
Managing customer service cases.	<ul style="list-style-type: none"> <li>▪ Identification.</li> <li>▪ Communications and responses to any questions directed to customer service (over the phone or in digital channels, including social media).</li> <li>▪ Investigations and support in the event of complaints and claims linked to the use of our services, for example when we help you resolve a problem resulting from your rental of a vehicle from us.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Name.</li> <li>▪ Personal ID number.</li> <li>▪ Driving licence and driving licence number.</li> <li>▪ Contact details (e-mail address, mobile number, address).</li> <li>▪ Copy of identification document.</li> <li>▪ Data supplied by the customer for the claims case.</li> <li>▪ Data about the purchase date, purchase location, any faults/complaints.</li> </ul>

**Legal grounds:** *Legitimate interest.* This processing is necessary to honour our and your legitimate interests in managing claims and customer service cases.

**Storage period:** Until customer service issues can be resolved, as well as for the period necessary to establish, assert or defend legal claims.

Purpose	Processing	Categories of personal data
To fulfil legal obligations.	<ul style="list-style-type: none"> <li>▪ Recording of financial transactions.</li> <li>▪ Necessary processing in order to fulfil legal obligations required under the law, legal judgments or government</li> </ul>	<ul style="list-style-type: none"> <li>▪ Name.</li> <li>▪ Personal ID number.</li> <li>▪ Contact information (e.g. address and e-mail address).</li> <li>▪ Payment history.</li> <li>▪ Payment information.</li> </ul>

	decisions (e.g. the Finnish Accounting Act).	<ul style="list-style-type: none"> <li>Your correspondence.</li> </ul>
<p><b>Legal grounds:</b> <i>Legal obligation.</i> This collection of your personal data is required by law. If this data is not provided, our legal obligations cannot be fulfilled, and we will be forced to refuse you the rental.</p>		
<p><b>Storage period:</b> Three years from the expiry of the rental agreement and seven years for accounting purposes.</p>		

Purpose	Processing	Categories of personal data
<ul style="list-style-type: none"> <li>Marketing.</li> </ul>	<ul style="list-style-type: none"> <li>Creating targeted offers and discounts and inspirational email marketing.</li> <li>Analysing the information we collect for the purpose of putting you into a target group so we can create targeted offers and discounts and other customised communications.</li> </ul>	<ul style="list-style-type: none"> <li>Name.</li> <li>Contact details (e.g. e-mail address and address).</li> <li>Gender.</li> <li>Information about frequent flyer programme bonuses/loyalty programmes of which you are a member.</li> </ul>
<p><b>Legal grounds:</b> <i>Legitimate interest.</i> This processing is necessary in order to honour our legitimate interest in providing our services and so the customer can take advantage of offers where eligible.</p>		
<p><b>Storage period:</b> Two years from expiry of rental agreement.</p>		

Purpose	Processing	Categories of personal data
Investigation into vehicle damage.	<ul style="list-style-type: none"> <li>Filing damage claims with insurance companies.</li> <li>Communications with customer to obtain information about the course of events.</li> <li>Investigation into how the vehicle came to be damaged.</li> </ul>	<ul style="list-style-type: none"> <li>Name.</li> <li>Personal ID number.</li> <li>Driving licence and driving licence number.</li> <li>Contact details (e-mail address, mobile number, address).</li> <li>Copy of identification document.</li> <li>Data about the rental asset.</li> <li>Data supplied by the customer for the claims case, such as vehicle usage.</li> </ul>
<p><b>Legal grounds:</b> <i>Legitimate interest.</i> This processing is necessary to honour our and your legitimate interests in investigating damage to our vehicles.</p>		
<p><b>Storage period:</b> The data will be processed until the investigation of the incurred damage has been concluded and any compensation from the insurance company has been paid, as well as for the period necessary to establish, assert or defend legal claims.</p>		

Purpose	Processing	Categories of personal data
Customer surveys.	<ul style="list-style-type: none"> <li>Developing and analysing results from customer satisfaction and marketing surveys.</li> <li>Compiling statistics about the use of our services based on the personal data collected for that purpose.</li> </ul>	<ul style="list-style-type: none"> <li>Name.</li> <li>Contact details (e-mail address, mobile number, address).</li> <li>Information about frequent flyer programme bonuses/loyalty programmes of which you are a member.</li> <li>Rental history.</li> <li>The answers you provide in the customer survey.</li> </ul>
<p><b>Legal grounds:</b> <i>Legitimate interest.</i> This processing is necessary to honour our legitimate interest in conducting customer surveys to develop our offers and HERTZ offers as a whole as a franchise organisation including franchisers and franchisees.</p>		
<p><b>Storage period:</b> Data will be processed for one year after the customer survey was conducted.</p>		

Purpose	Processing	Categories of personal data
Ensuring that the rented vehicle is used within the agreed geographical area.	<ul style="list-style-type: none"> <li>Checking where vehicles are located if they are not returned on time or if the vehicle is driven outside of the agreed geographical area, as well as for communications with the customer in connection therewith.</li> </ul>	<ul style="list-style-type: none"> <li>Name.</li> <li>Contact details (e-mail address, mobile number, address).</li> <li>GPS position.</li> </ul>
<p><b>Legal grounds:</b> <i>Legitimate interest.</i> This processing is necessary to honour our legitimate interest in establishing, asserting and defending legal claims.</p>		
<p><b>Storage period:</b> The data will be processed for the duration of the rental agreement, as well as for the period necessary to establish, assert or defend legal claims.</p>		

Purpose	Processing	Categories of personal data
Offering discounts (e.g. to members of a union).	<ul style="list-style-type: none"> <li>Recording of customer's CDP number (a discount code based on membership, job or similar) in connection with rental of vehicles to apply the discount.</li> <li>For rental of vehicles, see table above.</li> </ul>	<ul style="list-style-type: none"> <li>Name.</li> <li>Personal ID number.</li> <li>Contact details (e-mail address, mobile number, address).</li> <li>CDP number.</li> </ul>
<p><b>Legal grounds:</b> <i>Legal claims.</i> This processing is necessary to honour our legitimate interest in establishing, asserting and defending legal claims.</p>		

**Storage period:** The data will be processed for the duration of the rental agreement, as well as for the period necessary to establish, assert or defend legal claims.

Purpose	Processing	Categories of personal data
Offering vehicles adapted for disabled customers.	<ul style="list-style-type: none"> <li>▪ Information about which types of specially adapted vehicles are offered.</li> <li>▪ Reservation of vehicles with the special adaptations requested by the customer.</li> <li>▪ For rental of vehicles, see table above.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Name.</li> <li>▪ Contact details (e-mail address, mobile number, address).</li> <li>▪ The customer's choice of specially adapted vehicle.</li> </ul>

**Legal grounds:** *Consent.* As data about the requirement for a vehicle with special adaptations for disabled customers may be regarded as sensitive personal data, we process such information on the basis of the consent you issue when booking our vehicles. You have the right to withdraw the consent you have issued at any time by contacting us using the contact details under point 11. Please note that if you choose to withdraw your consent prior to renting the vehicle, we will no longer be able to offer you the specially adapted vehicle you have chosen. Please note that withdrawn consent does not affect the legality of the processing that has already taken place on the basis of previously issued consent prior to its withdrawal.

**Storage period:** The data will be processed for the duration of the rental agreement, as well as for the period necessary to establish, assert or defend legal claims.

Purpose	Processing	Categories of personal data
Evaluating, developing and improving our services.	<ul style="list-style-type: none"> <li>▪ Tracking the vehicle to provide information during the journey about history, activities, restaurants, petrol stations or other places or services of interest.</li> </ul>	<ul style="list-style-type: none"> <li>▪ GPS position.</li> <li>▪ Places or services of interest.</li> </ul>

**Legal grounds:** *Consent.* We will ask you to consent to data processing for the purposes above. Issuing your consent is entirely voluntary, but is required for us to be able to provide the services you choose to use.

**Storage period:** Two years after the expiry of the rental agreement.

Purpose	Processing	Categories of personal data
Evaluating, developing	<ul style="list-style-type: none"> <li>• Sharing information about your driving behaviour or vehicle data (e.g. road conditions) with you, your employer or others during your rental.</li> </ul>	<ul style="list-style-type: none"> <li>• Driving behaviour.</li> <li>• Vehicle data (e.g. road conditions).</li> <li>• GPS position.</li> </ul>

and improving our services.		
<p><b>Legal grounds:</b> <i>Consent.</i> We will ask you to consent to data processing for the purposes above. Issuing your consent is entirely voluntary, but is required for us to be able to provide the services you choose to use.</p>		
<p><b>Storage period:</b> Two years after the expiry of the rental agreement.</p>		

Purpose	Processing	Categories of personal data
Evaluating, developing and improving our services for our overall customer base.	<ul style="list-style-type: none"> <li>▪ Modifying services so they are more user-friendly (e.g. changing the user interface to simplify the flow of information, or to highlight features frequently used by customers in our digital channels).</li> <li>▪ Creating documentation to develop and improve our range of vehicles, rental locations or pick-up points.</li> <li>▪ Creating documentation to improve IT systems in order to increase general security for the company and our visitors/customers.</li> <li>▪ Analysing data we collect for the purposes stated. Based on the data we collect (e.g. purchase history, age and gender), you will be sorted into a customer group (known as a customer segment) for which analyses will then be made on an aggregate level without any link to you as an individual. The insights from the analysis will form the basis for improvements to our services.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Age.</li> <li>▪ Gender.</li> <li>▪ Area of residence.</li> <li>▪ Correspondence and feedback regarding our services.</li> <li>▪ Purchase data and user-generated data (e.g. click and search history).</li> <li>▪ Technical data about devices used and their settings (e.g. language settings, IP address, browser settings, time zone, operating system, screen resolution and platform). Information about how you have interacted with us, i.e. how you have used the service, login method, where and for how long different pages were visited, response times, download errors, how and when you leave the service, etc.</li> </ul>
<p><b>Legal grounds:</b> <i>Legitimate interest.</i> This processing is necessary in order to honour our and our customers' legitimate interests in evaluating, developing and improving our services, products and systems.</p>		
<p><b>Storage period:</b> From collection and for three years thereafter.</p>		

Purpose	Processing	Categories of personal data
Profiling.	<ul style="list-style-type: none"> <li>▪ Sharing your information with a third party.</li> <li>▪ Allowing third parties to analyse data we collect for the purposes stated, their own data and publicly available data. Based on this data, you will be sorted into a customer group (known as a customer segment). The insights from the analysis will form the basis for targeted advertising for customer segments.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Personal ID number.</li> <li>▪ Postcode.</li> </ul>

**Legal grounds:** *Consent.* We will ask you to consent to data processing for the purposes above. Issuing your consent is entirely voluntary, but is required for us to be able to send customised offers as well as suggestions and information to you personally.

**Storage period:** Two years after the expiry of the rental agreement.

Purpose	Processing	Categories of personal data
Third-party marketing.	<ul style="list-style-type: none"> <li>▪ Sharing your information with a third party.</li> <li>▪ Allowing third-party companies of which you are a member to send you targeted offers.</li> <li>▪ Allowing third-party companies of which you are a member to create a profile of you to reach out to people with a similar profile to you who are also members of the third-party company.</li> </ul>	<ul style="list-style-type: none"> <li>▪ E-mail address.</li> </ul>

**Legal grounds:** *Consent.* We will ask you to issue your consent to the processing for the purposes above. Issuing your consent is entirely voluntary, but is required for us to be able to send customised offers as well as suggestions and information to you personally.

**Storage period:** Two years after the expiry of the rental agreement.

#### 4. Consent

We obtain your consent for each of the purposes stated in the table above. You have the right to withdraw consent you have issued at any time without having to give a reason. We will not carry out any processing of your personal data for this purpose unless you have issued your voluntary consent.

#### 5. Where do we collect your personal data from?

The Company processes personal data that has been collected directly from you, including but not limited to:

##### 5.1 ONLINE

<ul style="list-style-type: none"> <li>▪ Our website</li> <li>▪ Our kiosks</li> <li>▪ Our mobile apps</li> </ul>	<ul style="list-style-type: none"> <li>▪ Our official social media pages</li> <li>▪ Your device's browser</li> <li>▪ Third-party social media sites</li> </ul>
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##### 5.2 OFFLINE

<ul style="list-style-type: none"> <li>▪ Calls to and from bookings, customer service, roadside assistance, customer contact or member centre</li> <li>▪ Interaction with our licensees, franchisees and franchisers of the HERTZ brand</li> <li>▪ Physical rental locations manned by staff</li> </ul>	<ul style="list-style-type: none"> <li>▪ Transactions you perform with us, our licensees, franchisees and franchisers of the HERTZ brand and agents, including options you choose, charges incurred and any incidents or accidents that may occur</li> <li>▪ When you join our membership programme</li> </ul>
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<ul style="list-style-type: none"> <li>▪ On-board vehicle technology, technology in hired equipment or using telematics</li> <li>▪ In connection with a booking (including abandoned or cancelled bookings), rental of vehicles or equipment, or purchase of vehicles or equipment</li> <li>▪ Bookings you make with us through our licensees, travel agents or brokers, online or in person</li> </ul>	<ul style="list-style-type: none"> <li>▪ CDP sponsors or sponsors of promotional codes, affiliations or special discount codes</li> <li>▪ Consumer reporting agencies and other companies that have business relationships with us, for example our licensees and business partners, including airlines, hotels and insurance companies</li> <li>▪ Requirements management companies (either associated companies or third parties)</li> </ul>
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5.3 The Company also collects personal data from the following sources:

- (a) Franchisers/franchisees of the HERTZ brand,
- (b) Credit monitoring agencies and banks,
- (c) Insurance companies,
- (d) Suppliers of bonus/loyalty programmes,
- (e) Where applicable, your employer,
- (f) Public registers

**6. What happens if you do not provide us with your personal data?**

Some of the personal data you provide us with is required for us to be able to fulfil our obligations under the agreement we enter into with you when you rent a vehicle from us. If you choose to not provide certain personal data, we may not be able to fulfil our obligations and we will be forced to refuse you rental of the vehicle. The personal data with which you are required to provide us so you are able to use our services will become apparent when we ask you to provide such data.

**7. Who do we share your personal data with?**

In order to fulfil the purposes set out above, and in accordance with the below, the Company will share your personal data with the following recipients.

**7.1 Third-parties**

- (a) To provide services to you: We share your personal data between us, our agents, franchisees and franchisers of the HERTZ brand (Hertz Corporation/Hertz Europe Limited) and other companies to provide you with services, including:

<ul style="list-style-type: none"> <li>▪ making your bookings</li> <li>▪ processing and/or confirming your transactions</li> <li>▪ improving rental services, e.g. services provided in connection with the Hertz membership programme</li> </ul>	<ul style="list-style-type: none"> <li>▪ providing customer support</li> <li>▪ invoice processing in connection with your rentals and membership</li> <li>▪ for customer satisfaction and market research purposes to improve our services</li> </ul>
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- (b) To share with companies you use: We share your personal data with companies you use in connection with your rental, including:

<ul style="list-style-type: none"> <li>▪ your credit card provider and other companies that process your fees</li> </ul>	<ul style="list-style-type: none"> <li>▪ any provider of a membership that gives you rewards when you rent from us, e.g. bonus programme</li> </ul>
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<ul style="list-style-type: none"> <li>intermediaries you use, e.g. a travel agent, in relation to any aspect of your rental</li> </ul>	<ul style="list-style-type: none"> <li>any sponsor organisation that pays all or part of your rental fees</li> </ul>
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(c) Protective and legal reasons: We may use, share and disclose your person data for legal reasons that we deem necessary or appropriate, including:

<ul style="list-style-type: none"> <li>complying with applicable laws and legal processes</li> <li>processing, handling or otherwise responding to claims for damages, including in cases of bodily harm or property damage</li> <li>recovering our vehicles or any money, e.g. debt-collection agencies</li> <li>responding to requests from public bodies and authorities</li> </ul>	<ul style="list-style-type: none"> <li>enforcing our terms and conditions</li> <li>protecting our rights, integrity, security or property, and/or yours and that of our subsidiaries or others</li> <li>protecting our business or that of our subsidiaries</li> <li>making it possible for us to exercise available penalties or limiting the damages that we might incur</li> </ul>
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(d) Sharing with our service providers and agents: We may use other companies such as our service providers or agents to act on our behalf and help us in our business, and to perform services for us according to our instructions. These services may include running websites or databases, applications on our social media platforms, contests and other campaigns for us, email marketing, performing data analysis and conducting customer satisfaction surveys or other surveys. We will endeavour 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.

(e) Sharing for business transactions: We may share your personal data with third parties in connection with any or actual reorganisation, merger, sale, joint venture, assignment, transfer or other disposal of all or any part of our business, assets or shares (including in connection with compulsory winding-up or similar).

(f) Insurance companies; and

(g) where applicable, your employer.

## 7.2 Will we transfer your personal data outside of the EU/EEA?

We may transfer your personal data to countries outside of the EU/EEA, including to the USA. If the European Commission has not decided whether a country to which your personal data has been transferred has an adequate level of protection for your personal data, we will introduce appropriate security measures to ensure that your personal data is sufficiently protected regardless of the country to which it is transferred. These security measures may involve ensuring that the recipient (i) is in a country with an adequate level of protection, (ii) has entered into the European Commission's standard agreement, or (iii) abides by the Privacy Shield frameworks. Transfers made to the Hertz Corporation (franchisor for the HERTZ brand) are protected by Privacy Shield, which means that the transfer of data to the US is subject to those rules.

For information on the extent to which we transfer your personal data to countries outside of the EU/EEA, the countries to which we have transferred your personal data and the security measures taken for the transfer, please contact us by sending a written request via the contact information given in point 11.

## 8. Security

### 8.1 Security measures

The information is saved and accessed in various locations and cloud services. Servers that store information are primarily located in Europe and the US, although storage may take place in other locations. We use appropriate technical and organisational measures to (a) protect personal information against loss, theft, unauthorised use, disclosure or modification, and (b) ensure the integrity of your personal data. To help us protect your integrity, you should keep all logins and passwords, member IDs or other identifiers or data that you might have entered or provided in connection with your participation in or use of our products, services or websites confidential.

### 8.2 Transfers

As you may know, there is no completely secure method of transferring or storing data. There are risks associated with all types of transfer (such as loss, inaccuracy, interception and misuse of data transferred) due to the various ways in which transfer methods differ (e.g. post, telephone conversation, text message, fax and transfers via the internet or wireless network). If you have any reason to believe any account with us is no longer secure, please contact us immediately.

We will try to strike a balance between the security of your data and your convenience. As a result, we might sometimes use a communication method that is less secure than a less convenient alternative. For example, we might send an email or a text message in unencrypted form (i.e. that can be read immediately) since many of our customers cannot access encrypted (i.e. coded) emails or messages. This means that our message, if it is inaccurate or intercepted, can be read more easily than encrypted messages. Such messages may contain personal information. Please do not include confidential information, e.g. your credit card number or password for your account, in any emails or text messages you send to us or in any posts you make to a publicly available platform on a third party's social networking site, especially since all such posts are immediately made public. To communicate with us more securely online, please click on the link "Contact us" on our website.

## 9. Cookies

We use cookies on our website. Cookies are small text files consisting of letters and numbers that are sent from our web server and saved in your browser or on your device. We use the following cookies at hertz.fi:

<b>Necessary cookies</b>	Some cookies are required for the operation of our website. Without them you would not be able to navigate our website and use all of its features. Necessary cookies mean that information you provide and decisions that you make about your vehicle rental can be remembered from one page to the next in the booking process. Since these cookies are necessary, we do not allow you to disable them on our website.
<b>Functionality cookies</b>	We use functionality cookies to remember choices you have made during previous visits and changes you have made to personalise the website to your liking. We also use functionality cookies to give you improved services so that you can watch videos online. The information that these cookies collect is anonymised and only used in relation to that website.
<b>Performance cookies</b>	We use performance cookies to analyse how our visitors use our website and to monitor the performance of the website. This allows us to give you a better experience by customising our offering and quickly identifying and fixing any problems. These cookies do not collect information that can identify a visitor. All information collected is aggregated and is therefore anonymous and only used to improve how our website functions.

<b>Advertising cookies</b>	We and our advertisers may use cookies to display ads that we think are relevant to you and your interests. They are used to limit the number of times an ad is displayed and to gauge how effective the ad campaign is. We may also use cookies set by advertising companies that note you have visited this website and share that information with other advertising companies to enable targeted ads to be sent to your computer.
<b>Third-party cookies</b>	Third-party cookies are set by parties other than us. For example, our website might contain content that is integrated from e.g. YouTube and banners supplied via an advertising partner network. These websites can set their own cookies.

If you want to disable cookies or change the cookie settings on our website, click on the **Manage cookies** link in our website footer for full details and to specify your preferences.

Our website is not targeted at people under the age of 13 and we do not deliberately collect personal data from such people.

## 10. Which rights do you have?

A summary of your rights is given below. It costs you nothing to exercise these rights and you can exercise them by contacting us using the contact details given in point 11. Do not hesitate to contact us if you have any questions about your rights.

Please note that we will always assess any request to exercise a right in order to determine whether the request is reasonable. All rights specified below are not absolute and exceptions may be made.

In addition to the rights specified below, you are always entitled to submit a complaint to a supervisory authority regarding our processing of your personal data.

- (a) **Right to access.** You are entitled, on request, to receive a copy of your personal data as processed by us and to receive supplementary information regarding our processing of your personal data.
- (b) **Right to correction.** You are entitled to have your personal data corrected and/or supplemented if it is inaccurate and/or incomplete.
- (c) **Right to deletion.** You are entitled to request that we delete your personal data without undue delay in the following situations:
  - the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
  - you revoke your consent to the processing and there is no legal basis for the processing;
  - you have a legitimate objection to the processing of your personal data;
  - the personal data has been unlawfully processed; or
  - deletion is required to meet a legal obligation.
- (d) **Right to restriction of processing.** You are entitled to request that the processing of your personal data be restricted in the following situations:
  - the accuracy of the personal data is under investigation;
  - the processing is unlawful or no longer necessary, but you oppose the deletion of personal data and instead request restricted processing;
  - We no longer need the personal data but you need the personal data to establish, assert or defend legal claims; or

- you have objected to the processing of your personal data and this objection is under investigation.

- (e) **Right to data portability.** Under certain circumstances, you are entitled to receive the personal data concerning you and that you have provided to us in order to transfer this to another service provider if the processing of the personal data is based on your consent or the performance of an agreement.
- (f) **General right to object.** You are generally entitled to object to processing of your personal data based on our legitimate interest at any time. If you object, we must prove that we have compelling legitimate grounds for such processing or that we need the personal data to establish, assert or defend legal claims.
- (g) **Right to object to direct marketing.** You are entitled to object to processing of your personal data that takes place for the purposes of direct marketing at any time. If you do this, we will not continue to process your personal information for such purposes.

## 11. How to contact us

You can contact us as follows:

If you want to make a data request in regards to your rights presented above in chapter 10, please send us a written request by mail to the below address. In order us to identify you please attach a copy of your ID card/passport. Please also include your contact details.

First Rent A Car Finland Oy  
Data Protection Officer  
Taivaltie 1, 01610 Vantaa, Finland

If you want to make a generic inquiry regarding this Privacy Policy, please send us an email to [gdpr@hertz.fi](mailto:gdpr@hertz.fi) . It is not recommended to send personal data by email. We can not handle personal data requests that we have received by email.

## 12. Amendments

We reserve the right to amend this policy at any time and for any reason by uploading an amended version to our website, appropriate applications or other websites. Such amendments will apply to publication, but will not be applied retroactively. When we make a substantial amendment, we will specify the date of such an update on the first page above and put a message about this on our website.