

## **Privacy Policy**

The following privacy policy ("**Privacy Policy**") sets out the principles of our activities with regard to the processing of your personal data.

The Data Controller with respect to your personal data is Flex Rent Deutschland GmbH with its registered office at: (Köln Bonn Airport) Mietwagenzentrum, Terminal 1, Kennedystraße 51147 Köln, Deutschland, entered in the Register of Entrepreneurs – Handelsregister B des Amtsgerichts Köln with the Company Number HRB 80465, with a share capital of EUR 37,500.00 (the "**Data Controller**").

If you have any questions related to the processing of your personal data, please contact us by email: customer@flextego.com or in writing to the address of the Data Controller indicated above, with the annotation "Personal data".

The Data Controller selects and applies appropriate technical measures, including programming and organizational measures, ensuring protection of the data being processed, in particular protecting data from unauthorized access, disclosure, loss and destruction, unauthorized modification, as well as against processing of data in violation of the applicable law.

The Services available through the website are not addressed to children under 16 years of age. The personal Data Controller does not plan to deliberately collect data on children under 16 years of age.

This Privacy Policy contains information about the processing of personal data that you may provide to us, including when using the Website and the use of cookies on our website. Our goal is to ensure the protection of your personal data.

### **Purposes of the processing of personal data and legal grounds for data processing**

The Data Controller processes personal data within the scope of the purposes described below.

#### **1. Servicing of the Website**

- a. maintaining e-mail and traditional mail correspondence and telephone contact – personal data contained in this correspondence/voice message are processed only in order to communicate and resolve any matter to which the correspondence/voice message relates, pursuant to Article 6 (f) of the GDPR, which constitutes a legitimate interest of the Data Controller.
- b. electronic contact forms – personal data are processed in order to identify the sender and to handle their inquiry submitted through the provided form – the legal basis for processing is the necessity of processing for the performance of a contract for provision of services – Article 6 (1) (b) of the GDPR; in the scope of data provided optionally, the legal basis for processing is the provided consent – Article 6 (1) (a) of the GDPR.
- c. performance of a contract – exercise of rights and obligations under a contract pursuant to Article 6 (1) (b) of the GDPR.

- d. handling complaint processes – user support and handling, registration and processing of submitted complaints and defense against possible claims or pursuing claims pursuant to Article 6 (1) (f) of the GDPR, which constitutes a legitimate interest of the Data Controller.
- e. conducting marketing activities – marketing of the Data Controller's products/services on the basis of Article 6 (1) (a) and (f) of the GDPR, which constitutes a legitimate interest of the Data Controller.
- f. using data for statistical, analytical and reporting purposes on the basis of the legitimate interest of the Data Controller, i.e. improving the quality of services and adapting them to the needs of users – pursuant to Article 6 (1) (f) of the GDPR, which constitutes the legitimate interest of the Data Controller.
- g. use for accounting, bookkeeping, taxation and other purposes related to the performance of legal obligations pursuant to Article 6 (1) (C) of the GDPR,
- h. marketing (including analysing and profiling data for marketing purposes) regarding third-party products and services based on your consent – Article 6 (1) (a) of the GDPR.

## **2. Managing profiles on social media:**

- a. The Data Controller has a public Facebook profile. Therefore, it processes data that is generated by visitors to this profile (including comments, likes, Internet identifiers). Personal data of such persons are processed in order to enable them to be active on the profile, to effectively manage profiles, by providing information to users about initiatives and other activities of the Data Controller, and in connection with the promotion of various types of events, services and products, for statistical and analytical purposes, or they may be processed in order to pursue claims and defend against claims.
- b. the legal basis for the processing of personal data is the legitimate interest of the Data Controller pursuant to Article 6 (1) (f) of the GDPR, consisting in promoting its own brand and improving the quality of services provided, and if necessary – in pursuing claims and defending against claims.

## **3. Processing of personal data of staff members of contractors or clients cooperating with the Data Controller.**

- a. in connection with the conclusion of contracts as part of the conducted business activity, the Data Controller acquires from contractors/clients data of persons involved in the implementation of such contracts (e.g. persons authorized to maintain contacts, executing orders, etc.). The scope of the data transmitted shall in any event be restricted to the extent necessary for the performance of the contract and usually does not include information other than the given name, surname and business contact details.
- b. such personal data are processed in order to implement the legitimate interest of the Data Controller and its contractor (Article 6 (1) (f) of the GDPR), consisting in enabling the proper and effective performance of a contract. Such data may be disclosed to third parties involved in the implementation of the contract.

Depending on the purpose of data processing, their provision may be a precondition for the execution of an agreement (e.g. if an agreement is concluded) or may be voluntary but required in order to use our services or required for complaint settlement.

The provision of personal data for marketing purposes is voluntary. If consent is not provided for the processing of personal data generated during the use of our website and its functionalities, personal data will not be processed for such a purpose.

#### **4. Processing of personal data provided by the Website user.**

The Data Controller will only collect personal data in a lawful manner. By sharing your personal data on the Website, you consent to the use and processing of your personal data in accordance with this Privacy Policy.

Depending on the ways in which you choose to interact with the Website's functionalities, the Data Controller will collect your personal data on the basis of your consent (Art. 6 (1) (a) of the GDPR) in the following manner:

- a. the user registers their account on the Website providing their given name, surname, and e-mail address;
- b. the user subscribes to the email marketing list.

We do not directly collect your payment card details for the purpose of payment processing or customer service purposes. Your payment card details are collected, processed and stored directly by our third party payment processors in accordance with their terms of use and privacy policies. We do not store any details of your payment card.

#### **5. Scope of data collected**

The Website collects, directly or indirectly, the following information:

- a. telephone number,
- b. surname and first name of the user
- c. e-mail address of the user
- d. data on the Website's viewers;
- e. technical information provided by cookies and other tags, including connection logs and IP address, location data.

#### **Data retention period**

The period of storage of personal data depends on the purpose for which they are processed. Detailed rules on data retention periods are described below:

- a. in order to implement an agreement – for the duration of the agreement and settlements after its termination;
- b. in order to handle complaint processes – until the expiry of claims under the agreement;
- c. in order to conduct marketing activities – until the consent is withdrawn or an objection is submitted;

- d. for statistical, analytical and reporting purposes – for the period of the performance of a agreement, and then no longer than for a period after which claims under the agreement fall under the statute of limitations;
- e. for the purpose of carrying out accounting, bookkeeping, taxation and other legal obligations;

## **Data sharing**

The recipients of your personal data may include external entities providing support to the Data Controller on the basis of commissioned services, with which appropriate data processing agreements have been concluded. In connection with the conduct of activities requiring processing, personal data are disclosed to external entities, including in particular providers responsible for operating IT systems, entities providing legal or accounting services, or marketing agencies.

With your consent, the data may be made available to the Data Controller's business partners in order to enable the provision of commercial information about their offer and services. Consent provided by the user may be withdrawn at any time.

Personal data may be transferred to third countries and international organisations if entities established in those countries have implemented appropriate safeguards for the personal data processed. If personal data is transferred outside the EEA, the Company applies the standard contractual clauses as safeguards in relation to countries for which the European Commission has not identified an adequate level of data protection.

## **Rights**

You have the right to:

- a. withdraw your consent in the event that the Data Controller has obtained such consent to the processing of personal data (provided that this withdrawal does not affect the right to data processing carried out before the withdrawal);
- b. request the deletion of your personal data; on this basis you can request the deletion of data the processing of which is no longer required for any of the purposes for which they were acquired;
- c. request a restriction of the processing of your personal data – in the event of such a request, the Data Controller ceases to perform operations on personal data – with the exception of operations to which the data subject has consented – and their storage, in accordance with the adopted rules for data retention, or until the reasons for the restriction of data processing cease to exist;
- d. object – the data subject may object at any time – for reasons related to their particular situation – to the processing of their Personal Data, which takes place on the basis of the legitimate interest of the Data Controller (e.g. for analytical or statistical purposes); an objection in this regard should contain a justification;
- e. data portability – on this basis – in so far as the data are processed in an automated way in connection with a concluded contract or provided consent, the Data Controller shall issue data provided by the data subject in a computer-readable format. It is also possible to request that the data be sent to another entity – however, provided that there are technical possibilities in this regard both on the part of the Data Controller and that other entity;

- f. to lodge a complaint with a supervisory authority. The competent supervisory authority is the Federal Commissioner for Data Protection and Freedom of Information: Bundesbeauftragter für den Datenschutz und die Informationsfreiheit Graurheindorfer Straße 153 D-53117 Bonn

The Data Controller will verify your requests, demands or objections in accordance with the applicable personal data protection regulations. However, it should be kept in mind that those rights are not absolute; the regulations provide for exceptions to their application.

If you would like more information or to exercise one or more of the above rights, please send an email to: [customer@flextego.com](mailto:customer@flextego.com)

## **Cookies**

This site does not automatically gather any information, with the exception of the information contained in the cookies.

The cookies (cookie files) are computer data, and in particular text files, that are stored in the terminal equipment of a User of the Website and are intended to enable the use of the Website. Cookies usually contain the name of the website from which they originate, their storage time on the terminal device, and a unique number.

Detailed rules for the collection and use of cookies are set out in the [Cookies Policy](#).

The services and functions available within the Website will be expanded over time. This means, among other things, that in the future, the Data Controller may introduce changes to this document. Announcement of changes will be made in such a way that information about changes in the Privacy Policy will be placed within the Website. With each change, a new version of the Privacy Policy will appear with a new date. Any major changes will be highlighted accordingly. This document is presented for information purposes only.

The current version of the Privacy Policy is effective starting from 01.08.2022.