

# AVIS PRIVACY POLICY

## EFFECTIVE 01 NOVEMBER 2023

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### CONTACT DETAILS

#### Reservations

Reservations.SG@abg.com  
1800 737 1668

#### Roadside Assistance

Fleet.SG@abg.com  
+65 9487 1051

#### Customer Service

Customerservice.SG@abg.com

#### Claims

Fleet.SG@abg.com

## 1. GENERAL INFORMATION

We want you to feel comfortable about giving us access to your personal information. Use this Privacy Notice to find out what happens to your personal information when you interact with us and what choices you have.

This Privacy Notice does not apply to other Avis Budget Group and independent licensee locations. Please review the privacy notices of Avis Budget Group (<https://www.avis.co.uk/about-avis/privacy-policy>) and our independent licensees for information on how they use personal information that you provide to them.

This Privacy Notice covers the personal information the ABG companies collect, use and disclose through your use of our products and services either online or offline.

We need to collect personal information from you to rent a vehicle or provide our other services. We collect personal information when you give it to us, such as by telephone, fax, postal mail, email, at the counter, upon completion of an application or enrolment form, or through your use of our website or mobile Apps or the use of our products and services.

Please be aware that, in certain circumstances, where you do not provide personal information, which is required by us, we will not be able to provide the products and services under our contract with you or may not be able to comply with a legal obligation on us. For example, when renting a vehicle with us we will require information such as your name, address, payment information and driver's licence. If you fail to provide this information to us, we will be unable to rent a vehicle to you. You will be made aware if this situation arises and the consequences of not providing the personal information.

Sometimes, we will combine the personal information we receive from you with other information we received from other sources so we can provide you a more customised and hassle-free experience. This information may include your name, contact information, travel itinerary, booking request and other information that is relevant to your booking. These third parties include:

- a) Travel agents or a third-party booking service that you used to make your reservation;
- b) Your employer or association if you are using a corporate / association account;
- c) Companies within the Avis Budget Group and other licensees, in order to create a Wizard account or if you are making a booking in one location, served by a company within the Avis Budget Group or another licensee, for rental services in another location served by us; and
- d) Police and other law enforcement agencies if you are involved in an accident during your rental, or suffer any loss, damage or theft of the vehicle, or if you incur any speeding, parking, toll or other traffic-related fines or commit any traffic offences during your rental.

The purposes for which we use this information is set out in further detail in the rest of this Privacy Notice. There are a number of bases in data protection law that permit us to use your personal information for these purposes. These are: (1) that you have provided your consent to us using your personal information for that purpose (e.g. where you have given us your consent to send you electronic marketing); (2) that we need to use that personal information in order to fulfil our contract to provide products or services to you; (3) that the processing is necessary for the purposes of our legitimate interests, provided we have balanced these against your rights and interests; and (4) where we need to comply with a legal obligation (e.g. responding to government or law enforcement information requests).

These legitimate interests are: (a) to ensure effective administration and management of your relationship with us, including any rentals with us; (b) to understand how our customers use our services and to manage our vehicle fleet; (c) to carry out research and analysis on what services or products our customers want or how they would like us to improve our services and products; (d) to understand how our customers use our websites and Apps and identify any issues in how the websites and Apps are used and how we can improve the customers usage experience; (e) to tell our customers about the various products and services we can offer; (f) understand and respond to customer feedback; (g) to better tailor and personalise the promotions and benefits that we offer to our customers; (h) to prevent, detect, or investigate unauthorised use of our vehicles and systems and ensure we comply with law and our policies; and (i) manage any disputes and accidents and take legal or other professional advice.

We will collect technical information about your devices when you use our website and App where permitted. To learn about our online data collection, go to the Online Data section.

## 2. RENTING A VEHICLE

When you make a reservation, rent a vehicle or join one of our programs such as a corporate programme or our loyalty scheme, we collect information to provide you with our great services (for example, renting a vehicle, including performing the vehicle rental contract as set out in our General Conditions of Rental, Location Specific Conditions and Rental Agreement, providing any requested optional extras, taking payment, pre-authorisations and security deposits and providing discounts and offers or other benefits) and for our legitimate business interests (for example research and development of new products and services, undertaking fraud and security checks and enforcing our legal rights). The information we collect includes:

- a) name;
- b) email address (if you are booking online or wish to receive e-receipts);
- c) home address (for license validation and billing);
- d) employer details and business address (if you are a member of a corporate program);
- e) telephone numbers at which we can reach you;
- f) date of birth (for license validation and legal requirements);
- g) gender (for license validation);

- h) payment information such as your credit or debit card details (security code is obtained for transaction only - we do not keep it);
- i) tax number (if specifically requested);
- j) information from driver's licence and/or other government issued identification, including if you are an additional driver for the specific rental (for license validation and legal requirements);
- k) information from another form of identification documentation such as passport or national identity card if your driver's licence does not include a photo or is not recognisable as you and/or proof of address such as a utility bill (for security and anti-fraud purposes). The information we collect and retain will only include your photo ID where you are informed of this;
- l) special discount codes, partner member numbers, association memberships, corporate rewards programs (if you request discounts, special privileges and points programs);
- m) special requests and preferences, including:
  - a. your preferences regarding optional extras such as damage waivers and other protections;
  - b. where a delivery or collection service is available, the address where we will drop off or pick-up the vehicle and any optional extras you requested; and
- n) other information that may be required to rent you a vehicle and/or provide you with services.

Some vehicles come equipped with a global positioning system (GPS) or similar type tracking device that may also collect information about the vehicle. To learn about vehicle data we collect, scroll down to read about Vehicle Data.

If you have an accident, or suffer any loss, theft or damage to the vehicle during your rental or suffer any mechanical failure, we will collect information regarding such incident including your report of the incident and any police or other third-party report including details of those involved, together with the nature of any personal injuries and/or damage to the vehicle and optional extras. We will use this information to perform our contract with you (for example, the vehicle rental agreement and/or the terms of any optional extra like insurance); for our legitimate business interests (for example, in recovering the costs of any loss or damage caused to the vehicle); for complying with any legal obligation on us (for example, making any required notification of the incident to appropriate authorities); and establishing, exercising or defending legal claims arising as a result of such incident.

During your rental we will collect where and when you rented the vehicle, where and when you returned the vehicle, insurance preferences, fuel consumption, mileage, accident history and other information related to the vehicle and your use of it. This information is required in order to provide you with the services you requested under the rental contract or for our legitimate business interests (for example to monitor the usage of our vehicle fleet).

In addition to the purposes listed above, we use this information to better understand our customers and provide you with relevant offers.

We will also collect information about any speeding, parking, toll or other traffic-related fines that you incur or any traffic offences that you commit during your rental where these are provided to us by any law enforcement agency. We will use this information to deal with such fine or offence in accordance with the terms of your vehicle rental agreement with us.

Where you inform us that you have a medical disability that requires an adapted vehicle or other driver aid we will use that information in order to provide you with the service you requested and where you have given your explicit consent to us using that information.

When you call us (from any phone), we may record or monitor the call for quality control, training or similar purposes.

When you purchase a gift certificate or voucher, we collect the name and mailing address of the gift recipient in order to fulfill your order. We will only use this information for the specific reason for which it is provided. If you believe that one of your contacts has provided us with your personal information and you would like to request that it be removed from our database, please contact our customer service at the details set out in the [Data Controllers and Contact Details](#) section below.

### 3. AVIS PREFERRED

If you decide to join our loyalty programme we will collect and retain your name, contact details, drivers licence details, and date of birth.

We will use this information, along with information relating to your historic and future rentals, to allow you to take the benefits of membership of the Avis Preferred programme, including fast-track service at our rental counters, the ability to self-service elements of the rental through our App, and to provide you with further benefits to which you are entitled under the programme such as free upgrades and free rentals.

We also use this information to tailor the communications we may send to you and/or the promotions we may offer to you as a member of Avis Preferred from time to time.

We will also use this information for our internal analysis of how our customers use our services and to improve how we provide our services.

### 4. INSURANCE PRODUCTS

If you have requested any of the insurance products that we offer during your rental, such as Personal Accident Insurance, we will pass your personal information to the insurer that is underwriting that product in connection with you entering into a contract with that insurer for that product. The name of the insurer will be made available to you when you are requesting the relevant product.

In the event that you make any claim under one of these insurance products, your personal information relating to the claim will be provided to the insurer and any appointed claims handler. We do this to fulfil the terms of our agreement with you and to establish, exercise or defend any associated legal claims.

The use of your personal information by that insurer will be subject to the terms of that insurer's privacy notice.

## 5. VEHICLE DATA

Some vehicles you rent from ABG have been manufactured or equipped with on-board devices so as to be connected to the internet (connected car) which allow us to send commands to and receive certain information from the vehicle, including geolocation data from a global positioning system (GPS). If you rent a connected car from us your personal information will be processed in accordance with this Notice and the Connected Cars Privacy Addendum included in the General Conditions of Rental (or such other notice regarding connected cars as we may provide to you in the future).

## 6. INFOTAINMENT UNITS

If during a rental you connect or pair your mobile device with the vehicle (for instance via Bluetooth or USB port), please unpair your device and delete any personal data stored on the vehicle's infotainment system. We do not use this information but, if you do not delete it, the information may still be visible to subsequent customers who use the vehicle.

## 7. PHOTOS & VIDEO

Where indicated by signage at the relevant location, rental locations are also equipped with video security surveillance systems as well as cameras that record as our vehicles depart/enter our lots.

## 8. ONLINE DATA

When you download, visit and use our websites and/or Apps, we automatically collect technical information. This section tells you more about what technical information we collect and why we collect it.

IP Addresses & other information collected automatically: We may collect your IP address when you visit our websites to help us diagnose problems with our main computers, for system administration, to report aggregated information to our business partners, and to audit the use of our website. We do not normally link IP addresses to anything personally identifiable. In select circumstances, we may use IP addresses to help us identify you when we feel it is necessary to enforce compliance with our Website Terms and Conditions or to protect our service, site, users or others. We may also collect your browser type, Internet Service Provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyse trends in the aggregate and administer the site.

Session Replay: When you visit our website, we will sometimes also record information about your browsing session on the site, including which pages you visited and any forms on the website that you completed. We review this information to identify any technical issues in the operation of our sites and to improve the user interface our sites. We use a third party to help us with this service and this information will be passed to that third party for this purpose but this information is not disclosed to any other third party.

Cookies & other similar technologies: Please refer to our Cookies Policy located at [\[insert web link\]](#) for details of how we use cookies.

Mobile Analytics: When you download and use our Avis, Budget, Payless, Maggiore Rent and France Cars Car Rental Apps, we use mobile analytics software to help us better understand the functionality of our App on your mobile device. Our analytics may record how often you use the App, how you use the App, aggregated usage, performance data and from where you downloaded the App. To read more about how we use information for research please see the Analytics section.

Mobile GPS and Push Notifications: If you let us, when you use our Avis, Budget, Payless, Maggiore Rent and France Cars Car Rental Apps we may collect location markers using the GPS in your device. Knowing approximately where you are helps the App provide you better service, such as finding the nearest Avis, Budget, Payless, Maggiore Rent and France Cars rental location near you. This also helps us send you push notifications or other communications based on your location (for example, nearby special offers). We will use push notifications to provide certain services such as emergency or other service notifications, arrival and return notifications, providing information about vehicle location, available upgrades, providing details regarding our products and services etc. We will only share this information with our mapping provider for the purpose of providing you our services. To ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information. If you change your mind about sharing your location or receiving push notifications from the App, adjust the settings of your mobile device to turn off transmission of geolocation data or to stop transmission of push notifications at any time. Just remember if you do turn these features off, you will not receive information tailored to your location or special locations-based offers.

## 9. ONLINE ADVERTISING

We use third-parties to provide online or electronic ads on our behalf. These third parties use data about your visits to our websites and App usage to send you customised ads that may be of interest to you. This information is collected using cookies, scripts, pixel tags, etags, web beacons and other similar technologies by us and our third-party advertising partners in accordance with our Cookie Policy.

## 10. MARKETING

We may share personal information with third parties (as detailed in the Information Sharing section) to help us with our marketing and promotional projects, such as managing our social media pages, running contests, sweepstakes and other promotions, or sending marketing communications.

We may use your personal data for the purposes of running contests, sweepstakes and other promotions. Your personal data will only be used for these purposes where you have chosen to enter the relevant contest, sweepstake or other promotion or we are otherwise permitted by applicable law to automatically enter you as a result of a rental or other purchase from us.

We will only use your personal information to send you marketing where you have given us your consent to receive marketing or we are otherwise permitted by applicable law to do so. This marketing will be sent to you either electronically or to your postal address.

Don't want to receive promotional and marketing post, emails and text messages from us and our partners? No problem! You can withdraw your consent to direct marketing or tell us you do not want to receive such marketing at any time. See the Your Choices section to find out how.

## 11. ANALYTICS

We use analytic software, such as Adobe Analytics, Google Analytics and others, to help us to better understand the functionality of our software on our websites and Apps on your device. These software tools record technical information including about your device together with usage information such as how often you use our website or App, which features you use or don't use in the website App or which pages you visit on the website, aggregated usage, performance data, where the App was downloaded from and information about your visit to the site, including details of some of the URL clickstream to, through and from our website. Further information about these tools is set out in our Cookie Policy.

Want to learn about all what happens when you visit our websites or use our Apps? Learn more under the Online Data section.

## 12. CHILDREN

Our websites, Apps and services are not for children under the age of 16. This includes any links to other websites that we provide for your convenience. We don't knowingly collect personal information from children for any reason. If you think we have received personal information of your child or another minor, please contact our Data Protection Officer at the address set out in the [Data Controllers and Contact Details](#) section.

## 13. INFORMATION SHARING

We may share your personal information and vehicle data to affiliated and non-affiliated organisations as follows (which may store your information for these purposes):

Third party recipient	Purpose of disclosure	Legal Basis for Processing
The Avis Budget Group and other independent licensees / franchisees and network providers in order to perform our contract with you and to understand how you use our services and to improve our business.	<ul style="list-style-type: none"> <li>· Make and confirm your rental reservation;</li> <li>· Provide our rewards program and update partner points and rewards;</li> <li>· Connect with your corporate and commercial accounts;</li> <li>· Assist with navigation assistance or itinerary planning;</li> <li>· Provide customer assistance;</li> <li>· Resolve toll, traffic or parking violations;</li> <li>· Processing any claims relating to accidents and/or injuries;</li> <li>· Providing roadside assistance services;</li> <li>· To protect or defend the rights or well-being of us, our employees, customers or others;</li> <li>· Verify safe driver criteria for qualified drivers.</li> </ul>	<ul style="list-style-type: none"> <li>· Performance of Contract;</li> <li>· Legitimate Interests;</li> <li>· Legal obligation; or</li> <li>· Consent.</li> </ul>
Travel agents in order to perform our contract with you when you use a travel agent and to understand how you use our services and to improve our business.	<ul style="list-style-type: none"> <li>· Make and confirm your rental reservation;</li> <li>· Process payments and refunds;</li> <li>· Assist with navigation assistance or itinerary planning;</li> <li>· Provide customer assistance;</li> <li>· Providing roadside assistance services;</li> <li>· To protect or defend the rights or well-being of us, our employees, customers or others.</li> </ul>	<ul style="list-style-type: none"> <li>· Performance of Contract; or</li> <li>· Legitimate Interests.</li> </ul>

<p>Your employer or organisation in order to provide you with benefits of a corporate or association program and to understand how you use our services and to improve our business.</p>	<ul style="list-style-type: none"> <li>· Verify drivers licenses or other government identification.</li> <li>· Verify eligibility to use designated account and discount codes;</li> <li>· Connect with your corporate and commercial accounts and</li> <li>· Process billing, payments and refunds.</li> </ul>	<ul style="list-style-type: none"> <li>· Performance of Contract; or</li> <li>· Legitimate Interests.</li> </ul>
<p>Brokers in order to perform our contract with you when you book a rental through their service and to protect our business from fraud and bad debts.</p>	<ul style="list-style-type: none"> <li>· Make and confirm your rental reservation;</li> <li>· Process payments and refunds;</li> <li>· Provide customer assistance;</li> <li>· Handle debt collection;</li> <li>· Fraud check.</li> </ul>	<ul style="list-style-type: none"> <li>· Legitimate Interests.</li> </ul>
<p>Booking engines in order to perform our contract with you when you use a booking engine and to understand how you use our services and to improve our business.</p>	<ul style="list-style-type: none"> <li>· Make and confirm your rental reservation.</li> <li>· Verify eligibility to use designated account and discount codes;</li> <li>· Process payments and refunds;</li> <li>· To protect or defend the rights or well-being of us, our employees, customers or others.</li> </ul>	<ul style="list-style-type: none"> <li>· Performance of Contract; or</li> <li>· Legitimate Interests.</li> </ul>
<p>Credit card issuers in order to obtain payment from you.</p>	<ul style="list-style-type: none"> <li>· Process payments and refunds;</li> <li>· Fraud check;</li> <li>· Handle debt collection and confirm your rental reservation.</li> </ul>	<ul style="list-style-type: none"> <li>· Performance of Contract; or</li> <li>· Legitimate Interests.</li> </ul>
<p>Corporate account manager in order to provide you with benefits of a corporate or association program and to understand how you use our services and to improve our business.</p>	<p>If you are renting with a corporate, membership or other similar commercial entity account, we may share personal information with the organisation that manages the account for their own purposes. We recommend you review their privacy policy to learn more about their privacy practices.</p>	<ul style="list-style-type: none"> <li>· Performance of Contract; or</li> <li>· Legitimate Interests.</li> </ul>
<p>Marketing agent in order to provide you with benefits of a corporate or association program and to understand how you use our services and to improve our business.</p>	<ul style="list-style-type: none"> <li>· Provide our rewards program and update partner points and rewards;</li> <li>· To protect or defend the rights or well-being of us, our employees, customers, or others.</li> </ul>	<ul style="list-style-type: none"> <li>· Performance of Contract; or</li> <li>· Legitimate Interests.</li> </ul>
<p>IT service providers including IT platform providers and website analytics service providers in order to in order to perform our contract with you and to understand how you use our services and to improve our business.</p>	<ul style="list-style-type: none"> <li>· Support our IT systems and infrastructure;</li> <li>· Provide maintenance services for our IT systems and infrastructure;</li> <li>· Provision of data hosting and other data processing services;</li> <li>· Provide analytics services relating to your use of our website to identify any technical or user interface issues and/or improvements in connection with the website.</li> </ul>	<ul style="list-style-type: none"> <li>· Legitimate Interests.</li> </ul>
<p>Government, regulatory and law enforcement agencies in order to meet our legal obligations.</p>	<ul style="list-style-type: none"> <li>· To verify your driver's license and ensure you meet our safe driver criteria;</li> <li>· As requested by these agencies if the disclosure is required or permitted by law;</li> <li>· To take action regarding illegal activities, traffic offences or violations of terms of service;</li> <li>· If we have a good faith belief that there is an emergency that poses a threat to the safety of you or another person; and</li> <li>· As otherwise required or permitted by law.</li> </ul>	<ul style="list-style-type: none"> <li>· Performance of Contract; or</li> <li>· Legitimate Interests.</li> </ul>

Insurance companies and claims handlers in respect of any insurance product you purchase in connection with your rental.	<ul style="list-style-type: none"> <li>· Provide and service the insurance product you have requested;</li> <li>· Manage any claims that may be made under the relevant insurance policy.</li> </ul>	<ul style="list-style-type: none"> <li>· Performance of Contract; or</li> <li>· Legitimate Interests.</li> </ul>
Service providers of fraud detection and prevention services.	<ul style="list-style-type: none"> <li>· Detect and protect our services against fraud, theft or abuse;</li> </ul>	<ul style="list-style-type: none"> <li>· Legitimate Interests.</li> </ul>
Debt collection agencies, legal and other professional advisors.	<ul style="list-style-type: none"> <li>· Detect and protect our services against fraud, theft or abuse;</li> </ul>	<ul style="list-style-type: none"> <li>· Legitimate Interests.</li> </ul>
The Avis Budget group entity that operates its Customer Service Center located in Budapest, Hungary.	<ul style="list-style-type: none"> <li>· Answer any issues or concerns;</li> <li>· Monitor customer communications for quality and training purposes;</li> <li>· Assist with navigation assistance or itinerary planning;</li> <li>· Provide customer assistance;</li> <li>· Resolve toll, traffic or parking violations;</li> <li>· Processing any claims relating to accidents and/or injuries;</li> <li>· Providing roadside assistance services;</li> <li>· Assisting with the processing of payments and issuing of invoices;</li> <li>· Assisting with the resolution of damage incidents of damage to vehicles;</li> <li>· To protect or defend the rights or well-being of us, our employees, customers or others;</li> <li>·</li> </ul>	<ul style="list-style-type: none"> <li>· Performance of Contract;</li> <li>· Legitimate Interests;</li> <li>· Legal obligation; or</li> </ul>
Third party contractors and service providers including backup and disaster recovery specialists and debt collection agencies.	<ul style="list-style-type: none"> <li>· Provide services requested by you;</li> <li>· Manage and protect the ABG business and its security.</li> <li>· Provide customer assistance; and</li> <li>· To collect any overdue payments from you.</li> </ul>	<ul style="list-style-type: none"> <li>· Performance of Contract;</li> <li>· Legitimate Interests;</li> </ul>

We may also transfer or assign your personal information to third parties as a result of, or in connection with a sale, merger, consolidation, change in control, transfer of assets, bankruptcy, reorganisation, or liquidation. Or if we are involved in defending a legal claim, information about you that is relevant to such claim may be disclosed to third parties as a result of, or in connection with, associated legal proceedings.

We may, in accordance with the Marketing section, share your information with business and promotional partners (where you have provided your consent to such information sharing) in order to send you information about products and services you may like. If you decide you no longer want to receive such promotional and marketing messages, please read the Your Choices section to find out how you can opt-out.

## 14. YOUR CHOICES

If you want to opt out of receiving promotional and marketing emails, text messages, post and other forms of communications from us or our promotional partners in relation to which you might receive in accordance with the Marketing section, you can best opt out by using one of the following ways:

- Log into your account and update your profile.

To stop receiving promotional text messages:

- For our Avis customers text the word "STOP" to 48400; and

If you do opt out of receiving promotional and marketing messages, we can still contact you regarding our business relationship with you, such as account status and activity updates, survey requests in respect of products and services we have provided to you after you rent from us, reservation confirmations or respond to your inquiries or complaints, and similar communications.

Want to close your account, stop doing business with us, or otherwise opt out of us collecting, using or disclosing your personal information? We will be sorry to see you go. Please contact our customer service representatives in accordance with the [Data Controllers and Contact Details](#) section.

Please also see your rights set out in [Your Privacy Rights](#) section.

## 15. SAFEGUARDS

The security of your personal information is important to us. We take reasonable steps to make sure your information is protected from unauthorised use, access, disclosure, alteration, destruction or loss. For financial or payment information, we use firewalls and Transport Layer Security (TLS) encryption. We take security extremely seriously but as no system is 100% secure, we can't completely guarantee the protection of your personal information, any more than any other organisation can.

We do not ask for financial or payment information, such as your credit card number, passcode, account number or pin number, in an e-mail, text or any other communication that we send to you. Please always check that any website on which you are asked for financial or payment information in relation to our rentals or services is operated by us. If you do receive a suspicious request, do not provide your information and report it by contacting one of our customer service representatives as set out in the [Data Controllers and Contact Details](#) section.

You are responsible for keeping your account passcode, membership numbers and pin numbers safe and secure. Don't share those with anyone. If there is an unauthorised use or any other breach of security involving your information, you must notify us at the customer service contact information below as soon as possible.

## 16. INFORMATION RETENTION

We keep your personal information for no longer than is reasonably necessary or required by law. How long we keep it depends very much on the type of information and purpose.

We have set out how long we will typically keep certain types of information in common scenarios below:

Category of personal data	Examples
<b>Customer and member records.</b>	These records would include information used for the management of our relationship with customers including customer profiles, transactional history, customer preferences, personal information, satisfaction survey forms and other customer communications.
<b>Records related to customer and member issues and complaints.</b>	This includes correspondence (by letter, phone or email) relating to complaints and resolution of complaints and other issues such as change of address or lost and found documentation.
<b>Customer payment information.</b>	Payment information including the primary account number. Please note we do not store: (a) Personal Identification Numbers (PIN); (b) encrypted PIN blocks; (c) full contents of any track from the magnetic stripe on the back of the card; and (d) Card verification codes.
<b>Marketing data.</b>	These records would include information used for marketing to customers/potential customers including name, address, email address, customer preferences and opt in status.
<b>Avis loyalty scheme information.</b>	Customer information associated with an Avis loyalty scheme account. records would include information used for the management of our relationship with customers including customer profiles, transactional history, customer preferences, personal information, satisfaction survey forms and other customer communications.

For other categories of data, the criteria we use to determine the retention period is as follows:

- the length of time that you are a member of Avis Preferred or any other loyalty scheme that we operate or a member of any corporate programme;
- when your most recent rental occurred;
- whether there are contractual or legal obligations that exist that require us to retain the data for period of time;
- whether there is any ongoing legal claim that relates to any rental you have made with us, or that is otherwise related to your relationship with us;
- whether any applicable law, statute, or regulation allows for a specific retention period;
- whether the personal information is considered to be a special category of personal information, in which case a shorter retention period generally would be applied; and

These criteria may also mean we adjust the period of time we retain the categories of personal data detailed in the table above.

## 17. INTERNATIONAL TRANSFER RENTALS

As we offer the ability to rent vehicles and benefit from our services in many locations globally, we will transfer your personal information to our affiliates, independent licensees and travel agents in these locations for the purposes of fulfilling your rental request and/or entering into a rental agreement. Further purposes of processing are set out in the Information Sharing section above. The exact location of where your personal data will be transferred depends on the location of your rental. A list of these locations on our website at <https://www.avis.co.uk/drive-avis/car-hire-locations>.

Where these transfer are made your information will be stored with the affiliate, independent licensee or travel agent locally as well as with our data centre in the UK and customer service center located in Hungary.

Many of these countries to which your personal information may be transferred for these purposes that are located outside the EU do not benefit from an adequacy decision issued by the EU Commission regarding protection afforded to personal information in that country.



Adequacy of data protection is ensured by standard data protection clauses that we have in place with the relevant recipient. A copy of these standard data protection clauses may be downloaded on the European Commission's website or requested via our Data Protection Officer at the address set out in the [Data Controllers and Contact Details](#). Alternatively, these transfers are made because they are necessary for the performance of a contract to which you will be a party, or for pre-contractual measures.

## BUSINESS OPERATIONS

In addition, the information we collect from you may be transferred to, and stored by, IT vendors who operate on our behalf. If you make a booking in Europe then personal data will be held in our UK data centre. In addition, information will be shared with our booking engine hosting provider located in the United States and IT service provider located in India. The purpose of the disclosure and legal basis of processing are set out in detail in the [Information Sharing](#) section above.

The United States does not benefit from a decision issued by the EU Commission regarding protection afforded to personal information. Adequacy of data protection is instead ensured by standard data protection clauses we have in place with that third party. A copy may be requested via our Data Protection Officer at the address set out in the [Data Controllers and Contact Details](#).

Given the global nature of our business, we also transfer information within the group companies of Avis Budget Group, Inc. as for certain activities the group uses shared IT functions. Transfers from within the European Union for these purposes are primarily made to the United States and to India, although transfers may be made to other countries as well. The United States, India and many of the other countries located outside the European Union do not benefit from an adequacy decision issued by the EU Commission regarding protection afforded to personal information in that country. Adequacy of data protection is instead ensured by standard data protection clauses we have in place with the recipient. A copy may be requested via our Data Protection Officer at the address set out in the [Data Controllers and Contact Details](#).

## MARKETING

We also transfer information to a number of providers of marketing business applications - such as CRM and marketing applications - as well marketing service providers. These providers are primarily located in the United Kingdom and United States. The purpose of the disclosure and legal basis of processing is set out in detail in the [Information Sharing](#) section above.

Adequacy of data protection is ensured by standard data protection clauses we have in place with that third party. A copy may be requested via our Data Protection Officer at the address set out in the [Data Controllers and Contact Details](#).

## YOUR PRIVACY RIGHTS

You may have - in accordance with applicable data protection laws - the following rights when it comes to our handling of your personal information:

- Right of access - you may have the right to request a copy of the personal information we have about you and to request supporting information explaining how the personal information is used.
- Right of rectification - you may have the right to request that we rectify inaccurate personal information about you.
- Right of erasure - you may have the right to request that we erase personal information about you.
- Right to restrict processing - in some situations, you may have the right to request that we do not use the personal information you have provided (e.g. if you believe it to be inaccurate).
- Right to data portability - you may have the right to receive certain of your personal information in a structured, commonly used and machine-readable format and to transmit such information to another controller.
- Right to withdraw consent - where we process your personal information based on consent (including direct marketing consents), you have the right to withdraw consent at any time. However, this will not affect the lawfulness of the processing based on consent before its withdrawal. Furthermore, even in case of a withdrawal we may continue to use your personal information as permitted or required by law.

**Right to object:** In addition, where we are processing your personal information based on a legitimate interest (or those of a third party) you may challenge this. However, we may be entitled to continue processing your information based on our legitimate interests or where this is relevant to legal claims. You also have the right to object where we are processing your personal information for direct marketing purposes.

In addition, if specifically provided for under your local law, you will have a right to define post-mortem guidelines - meaning you may define guidelines regarding the storage, erasure, and disclosure of your personal data after your death.

To exercise any of these rights or should you have any concerns about how we process your personal information, please contact our Data Protection Officer at the address set out in the [Data Controllers and Contact Details](#) section below.

You are also free to lodge complaint with the supervisory authority, should you feel that we process your personal information in a way that is against applicable law.

## 18. DATA CONTROLLERS AND CONTACT DETAILS BY COUNTRY

If you are making a rental, the data controller is listed in the table below.

You can also contact our Data Protection Officer in respect of any issues or questions you have regarding our processing of your personal information:

Email: [insert licensee contact details]

Postal Address: [insert licensee contact details]

Telephone: [insert licensee contact details]

When you contact us, we may take steps to verify your identity for security purposes.

Country	Data Controller	Contact Information
Singapore	NATIONAL CAR RENTALS PRIVATE LIMITED 390A HAVELOCK ROAD, 01-07 Waterfront Plaza, Singapore 169664.	<a href="mailto:DPO@abgroup.com.au">DPO@abgroup.com.au</a>

## 18. INDEPENDENT LOCATIONS

Did you know that many Avis, Budget, Payless, Maggiore Rent and France Cars locations are owned and operated by the Avis Budget Group or otherwise independently owned and operated? Each of these locations collects, uses and discloses personal information for its own purposes. We do not control the Avis Budget Group's or its other independent licensee's or franchisee's use of this personal information. Please ask to review the privacy notice for that location.

When you are dealing with Avis Budget Group or another independent location, either Avis Budget Group or the relevant licensee or relevant franchisee is responsible for collecting and processing payment and may engage in its own email campaigns and other forms of marketing to you. We are not responsible for the compliance with privacy laws of Avis Budget Group or any other independent location. However, if you believe that Avis Budget Group or any independent location is violating privacy laws, you may report this to Avis Budget Group's Data Protection Officer at [dpo@abg.com](mailto:dpo@abg.com).