

Privacy policy

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In the following we would like to inform you about the types of data processed by SIXT and about the purposes of such data processing. We would also like to inform you about important legal aspects of data protection, such as your rights.

A: Data controller, contact details of the data protection officer

The party responsible for processing your data (controller) is Sixt SE, Zugspitzstraße 1, 82049 Pullach (hereinafter also referred to as SIXT).

If you have any questions on data protection, please contact us at dataprotection@sixt.com.

You can also contact our data protection officer at the following address: SIXT SE, Zugspitzstraße 1, 82049 Pullach.

B: Categories of personal data

The following categories of personal data can be processed by us in connection with our services:

- Master data: These include, for example, a person's first name, surname, address (private and/or business), date of birth.
- Communication data: These include, for example, a person's telephone number, email address (private and/or business) fax number if applicable, as well as background (e. g. media, shareholder) and the requested content (e.g., ad-hoc statements, press releases).

C: The legal basis for data processing at SIXT

Art. 6 (1) point (a) of the General Data Protection Regulation (GDPR): Pursuant to this provision, the processing of your personal data is lawful if and to the extent that you have given your consent to such processing.

Art. 6 (1) point f) GDPR: Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for the purposes of the legitimate interests pursued by the controller, i.e., SIXT, or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, i.e., you yourself.

D: The purposes of data processing at SIXT

1. Self-marketing and Investor Relations

Purposes of data processing

We process your master data and communication data for the purpose of sending you investor relation related information.

You may at any time object to your email address being used without incurring more than the cost of transmission as per the applicable basic fees.

Legal basis for processing

Art. 6 (1) point a) GDPR applies to data processing for purposes of implementing direct marketing measures that require explicit advance consent.

Art. 6 (1) point f) GDPR applies to data processing for purposes of implementing direct marketing measures that do not require explicit advance consent, and of implementing the marketing measures mentioned (→ Purposes of data processing).

Legitimate interest, to the extent that Art. 6 (1) point f) GDPR applies to the type of processing concerned

Our legitimate interests in using your personal data for purposes of implementing direct marketing measures and the marketing measures mentioned lie in the fact that we want to convince you of our services and promote a lasting customer relationship with you.

Categories of recipients of your data

For the purposes described in the foregoing, we disclose your data to IT service providers.

2. Procurement

Purposes of data processing

We process your master data and communication data for purposes of strategic and operational procurement of products and services for SIXT.

Legal basis for processing

Art. 6 (1) point b) GDPR applies to the processing of data to the extent required to conclude and fulfill supplier contracts.

Art. 6 (1) point f) GDPR applies to the processing of data required for supplier management.

Legitimate interest, to the extent that Art. 6 (1) point f) GDPR applies to the type of processing concerned

Our legitimate interests in using your personal data for purposes of direct marketing and mentioned marketing activities lie in the fact that we want to present our offers to you and to establish a sustainable customer relationship.

Categories of recipients of your data

For the purposes described in the foregoing we disclose your data to our service provider „Coupa Software Inc.“ who provides us with a cloud-based procurement tool.

For the purposes described in the foregoing we disclose your data to SIXT Group companies.

E: Transfer to third countries

The transfer of your data to a third country is based on an adequacy decision by the European Commission. If no adequacy decision by the European Commission exists for the respective third country, then the transfer to that third country will take place subject to appropriate safeguards as per Art. 46 (2) GDPR. You can request copies of the aforementioned safeguards from SIXT by writing to the address specified above (cf. → Controller). Third countries are countries outside the European Economic Area. The European Economic Area comprises all countries of the European Union as well as the countries of the so-called European Free Trade Association, which are Norway, Iceland and Liechtenstein.

F: Storage duration/criteria for storage duration

SIXT stores your personal data until they are no longer necessary in relation to the purposes for which they were collected or otherwise processed (see → Purposes of data processing at SIXT). Where SIXT is under legal obligation to store personal data, it will store personal data for the preservation period stipulated by law. The preservation period for commercial documents, which include bookkeeping documents and accounting records (including invoices), is 10 years (Section 257 (4) of the German Commercial Code). During this period, your data may be subject to restricted use within day-to-day operations if its processing serves no further purposes.

G: Your rights

1. Rights pursuant to Art. 15 – 18 and 20 GDPR

You have the right to, at reasonable intervals, obtain information about your personal data under storage (Art. 15 GDPR). The information you are entitled to includes information about whether or not personal data concerning you are stored, about the categories of personal data concerned, and about the purposes of the processing. Upon request, SIXT will provide you with a copy of the personal data that are processed.

You also have the right to obtain from SIXT the rectification of inaccurate personal data concerning you (Art. 16 GDPR).

You furthermore have the right to obtain from SIXT the erasure of personal data concerning you (Art. 17 GDPR). We are under obligation to erase personal data in certain circumstances, including if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, if you withdraw the consent on which the processing is based, and if the personal data have been unlawfully processed.

Under certain circumstances, you have the right to have the processing of your personal data restricted (Art. 18 DSGVO). These include circumstances in which you contest the accuracy of your personal data and we then have to verify such accuracy. In such cases, we must refrain from further processing your personal data, with the exception of storage, until the matter has been clarified.

Should you opt to change to receive investor relations information from a different vehicle rental company, you have the right either to receive, in a machine-readable format, the data that you provided to us based on your consent or on a contractual agreement with us, or to have us transmit, also in a machine-readable format, such data to a third party of your choice (Right to data portability, Art. 20 GDPR).

2. No contractual or legal obligations to provide data/consequences of failure to provide data

You are not contractually or legally obliged to provide us with your personal data. Please note, however, that you possibly cannot enter into contract with us if we are not permitted to collect and process the data as required.

3. Right to object pursuant to Art. 21 GDPR

If the processing of your data by SIXT is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Art. 6 (1) sentence 1 point (e) GDPR) or if it is necessary in the legitimate interests of SIXT, then you have the right to object at any time, on grounds relating to your particular situation, to the processing of your data. SIXT will then end the processing, unless we can present compelling legitimate grounds for such processing that supersede the grounds for ending the processing.

4. Right to withdraw consent at any time

If data processing at SIXT is based on your consent, then you have the right to, at any time, withdraw the consent you granted. The

withdrawal of consent shall not affect the lawfulness of processing between the time consent was granted and the time it was revoked.

5. **Right to lodge a complaint**

You have the right to lodge complaints with the supervisory authority responsible for SIXT. Please send such complaints to the following address:

Bayerisches Landesamt für Datenschutzaufsicht (BayLDA)
Promenade 27 (Schloss)
91522 Ansbach