

Long-Term Rentals' Privacy Notice

The company under the name "OLYMPIC COMMERCIAL & TOURIST ENTERPRISES SINGLE-MEMBER SA" (hereinafter "Avis Budget" or "company" or "we") located in Halandri, Attica, 50A Vas. Georgiou Street, tel. +302106879800, e-mail address: contact@avis.gr acts as a Data Controller for all long-term car-rental services related personal data it processes. The personal data may belong to customers, guarantors, or registered drivers of leased vehicles.

1. What kind of data do we collect and how we use it

We make sure to collect only the necessary data to serve the purpose for which they were given and use them for this purpose only. We will also use your contact data to inform you about issues concerning the rental and about new offers and services. The processing of your data is carried out either by our authorized personnel and exceptionally by third parties, who are bound by confidentiality agreements and data processing agreements to protect your data and process it only for the purpose for which they have been provided.

Pre-contractual stage: To register your request and send you a long-term lease offer we ask for the following data: name, e-mail address, VAT number and telephone number. The purpose of processing is to register your request, to configure an offer that suits you and to contact with you about it. Legal basis is the contract (pre-contractual stage of offer configuration)

Pre-contractual stage of client's (or guarantor's) application assessment: In order to accept the application for a long-term car rental we ask the prospective leaser and -when needed- the guarantor, for the following data: full ID data and ID copy, home address, telephone number, e-mail address, VAT number, tax clearance notes, copy of payroll. During this stage we may process data from the tool Check by Tiresias and Credit Eye by ICAP. The purpose of processing is to evaluate the credit risk of your application and legal basis is the company's legitimate interest to exercise its right to economic freedom based on information that ensures commercial credit, reliability, and security of transactions. Furthermore, for the evaluation of your application we process data of the history of your rental contracts with us, in order to protect the legitimate interests of property of our vehicles, trust in our transactions and, in general, all commercial interests of the company as reflected in our contracts. Your evaluation data is kept by our company for five (5) years.

Lease agreement: To draw the lease agreement we need your full name, your father's name, your home address, your VAT number and your ID and driving license data. If the process is paperless we will also need your electronic signature. The purpose of processing and the legal basis is the contract.

Driver's data: If the driver of the vehicle is other than the lessee you will be asked for the driver's name, email address, telephone number, date of birth, ID and driving license data as well as a copy of them. The purpose of processing is to notify the Authorities in case of an accident or traffic violation and to have the necessary information about the holder of the vehicle. Legal basis is the fulfillment of our legal obligation and Avis' legitimate interest to have control over its assets (vehicles).

Accident report: In the event of an accident you will be asked to submit a report in which, in addition to your information, that we already have, you may need to provide third party contact details (if a third person has been injured) and a brief description of the incident. The legal basis is our legal obligation to insure our vehicles and the contract with the insurance companies.

Contact Avis: You can contact us to ask for information, make a request, make an appointment for car maintenance or for any other reason. We will only ask for the necessary data according to your request. All calls, both incoming and outgoing, are recorded to provide evidence of the transaction and the related communication. Legal basis is the contract or our company's legitimate interest to keep evidence about the content of the call. The retention period of the audio material is two years and we do not share it with any third parties except our cooperating call centers. In case of any kind of claim the fragment at issue alone may be extracted and kept for a longer period or get transmitted to the competent authorities.

Data via My Avis App: At the beginning of our cooperation you automatically gain access to the MyAvis digital customer platform through which you can book a service appointment for your car as well as have access to many

other services. The legal basis is our company's legitimate interest in providing prompt and effective services to its customers.

Through this application you can make an appointment for your car service as well as for many other services – in this case you will be asked for the license plate number & contract as well as your email address. Legal basis is the contract.

Data stored in electronic applications (navigator, Bluetooth, gps etc.): When you (or a fellow passenger) use the vehicle, you may store data in electronic applications installed in the vehicle by the manufacturer. Our company will never ask you to proceed to such storage and, if you do so, it will be solely your choice. It is your responsibility to delete such data prior to the vehicle (temporary or permanent) drop-off.

Geolocation data (gps): Some of our vehicles may carry geolocation systems (gps). These systems will be activated only in cases of theft of the vehicle, following a relevant notification from the lessee / driver. The legal basis is the legitimate interest of protecting the vested interest of company's property.

Response to personal data requests: To satisfy any of your rights (access, deletion, correction, etc.) we will ask you for the minimum identification data as well as your signature. Legal basis is our legal obligation to respond to data subjects' requests.

Participation in on-line promotions/competitions: The company processes data, which you fill in in order to participate in a competition, and notifies you, in case you are among the winners, in order to deliver your gift. Legal basis is the legitimate interest and, as far as the winners are concerned, the contract.

Participation in on-line market surveys/customer satisfaction questionnaires: The company processes data you fill out for your participation in surveys and customer satisfaction questionnaires. The purpose of processing is to improve the features of our services offered to you and the legal basis is our legitimate interest in the improvement of our services based on your evaluations.

Profiling: The company processes your data as well as Social Network Usage Data given directly from you or from the respective social network providers to send targeted newsletters that better meet your needs and preferences as well as to evaluate and improve our products / services (research and/or analysis to better understand your needs, research and evaluation to improve existing products and/or services and develop new ones, evaluation for the creation of new programs, offers, etc.).

Commercial Communications: The Company processes your data as well as Social Network Usage Data given directly from you or from the respective social network providers for the purpose of creating targeted online campaigns for you with the aim of advertising and promoting our products and services by electronic means, including conducting competitions / events, providing loyalty programs and conducting customer satisfaction surveys.

Combating money laundering and terrorist financing: Our company, pursuant to Law 4557/2018, is obliged to process your personal data for the purpose of preventing and combating money laundering and financing of terrorism. The categories of personal data that Avis will process are: identity information, contact information, income information and professional activity information, for the purpose of ascertaining, verifying and reviewing them. Your data, processed for the above purposes, will be kept by our company for ten (10) years.

Harmonization with international and European sanctions against persons and businesses: During the stage of drawing up of the contract as well as throughout the duration of the contract, the company may process the data of your application for the execution of any of its obligations arising from the Union and Greek legislation regarding sanctions against persons and businesses. Your data, processed for the above purposes, will be kept by our company for ten (10) years.

Compliance with applicable law: Our company processes your data to be able to meet its legal obligations. It will transmit your data to meet its legal obligations, related to compliance with tax and insurance legislation or vehicle insurance coverage resulting from an active insurance contract. It will also forward your data if a request is made by public authorities (such as the Police, judicial authorities, etc.), after examining the existence of a public interest or the need to exercise public authority. The legal basis is the company's compliance with its legal obligations.

2. Who are the recipients of your data?

Avis guarantees that it will not transmit, disclose or transfer your data to third parties (other than the ones mentioned herein) for any purpose or use, unless this is mandatory by law or essential to defend the company's interests or is mandated by public or judicial authorities. Only the necessary personnel, bound by confidentiality agreements, has access to your data. Other recipients may be: cooperating companies that support and serve the lease agreement and assist with Avis Budget's internal organization such as: car dealers, cooperating insurance companies and road side assistance companies, cooperating vehicle repair, refinishing, or maintenance companies, cooperating call centers, banks and electronic payments companies, lawyers or law firms to support Avis' interests, security services companies, cooperating IT systems and platforms' maintenance companies, cooperating companies that provide communication, marketing and customer satisfaction support, chartered accountants companies that audit company's financial statements as well as other consulting services providers or companies that may need to carry out third-party audits. The above are bound by data protection agreements to respect confidentiality, refrain from transferring your data to third parties without the Company's permission, take appropriate security measures and comply with the legal framework regarding personal data protection, in particular Regulation (EU) 679/2016 and Greek Law 4624/2019.

Finally, we may need to disclose your personal data to a potential buyer as well as to his associates or advisers in the event of a sale, merger, restructuring, liquidation, or acquisition of our company. In this case the recipient will comply with our privacy policy.

3. When do we delete your data?

We keep your data for the necessary time to fulfill the purpose of processing, in compliance with applicable laws. Exceptionally, they may be retained for a longer period if this is required to defend AVIS's interests or to rebut claims.

All the data we keep regarding the contract shall be retained for a minimum period of eleven (11) years from the end of the lease. Data from TIRESIAS shall be kept for a maximum of 5 years from their collection.

Data related to the lease offer or the evaluation of the lease application (precontractual stage), provided that no contract is signed, are retained for two (2) years after the end of the year in which the offer expired.

The registered driver's data shall be kept for a minimum of five (5) years after the notification of the termination of the vehicle use or the replacement with another driver.

Data collected from accident reports shall be retained for five (5) years from the end of the year the report was submitted unless legal claims have been raised in which case they will be retained until the statute of limitations (twenty years).

Data collected from our communication (audio material, written requests, etc.) are retained for two years from each contact.

Data collected from your participation in competitions and/or market surveys will be retained for as long as necessary to complete the contest/survey and subsequently deleted or anonymized.

Data processed from your participation in customer satisfaction surveys will be retained for the duration of our cooperation.

The data you provide us to satisfy one of your rights related to personal data (access, correction, deletion, etc.) shall be retained for two (2) years from the processing of each request.

4. Is your data secure?

At Avis we are committed to keeping your data safe. We have taken all appropriate organisational and technical measures, that always keep up with the technological developments, to provide a high level of security and protection from any kind of accidental or unlawful processing. These measures are being reviewed and amended on a regular basis or when necessary.

5. What are your rights and how do you exercise them?

You have the right of accessing your data, the right of rectification, erasure, data portability, restriction, and objection to the processing of your personal data. If you have given your consent to the collection, processing and use of the data, you can withdraw it at any time with future effect. In relation to credit risk profiling, in case your application has been rejected, you have the right to be informed of the relevant scoring and the reasoning followed, to express objections and to request a second non-automated decision by a human agent. In order to exercise your rights, you can submit a request to the e-mail address gdpr@avis.gr and we will make sure that we process it and reply to you, free of charge, within one (1) month of receipt. Exceptionally and after informing you, we may need an extension of two (2) months. If your request is clearly unfounded or excessive, especially because of its repetition, the company may impose a reasonable fee, taking into account the administrative costs of providing the information or execution of the requested action or refuse to follow up the request. If your request is unduly not met, you have the right to lodge a complaint with the Data Privacy Authority through the www.dpa.gr website.

6. Do we use automated decision-making including profiling when processing your data?

Avis, as part of the credit risk assessment of your application, carries out profiling, automatically classifying you according to the risk presented by your application.

7. What is the applicable law when we process your data?

The applicable law is the Greek Law, in accordance with the General Regulation on the Protection of Personal Data (EU)2016/679 and the national and European legislative and regulatory framework for the protection of personal data.

8. How will you be informed of any changes to this notice?

This notice may be amended at the discretion of Avis. An updated version of this Notice, bearing an amendment date, will be displayed on our website for all users to be informed. We urge you to read it to be informed of any changes. Last amendment September 2024.