

NOTICE ON THE PROCESSING OF PERSONAL DATA IN THE CONTEXT OF PARTICIPATION IN THE “AVIS MORE” PROGRAM

1. GENERAL TERMS

The company under the name “OLYMPIC COMMERCIAL & TOURIST ENTERPRISES SINGLE-MEMBER S.A.”, operating under the trade name “Avis Budget Greece”, headquartered at 50A Vas. Georgiou Street, Chalandri, Attica, Tel. +30 2106879800, contact@avis.gr (“Avis”, “Company”, or “we”), acting as Data Controller, collects and processes your personal data in connection with your participation in the “Avis More” loyalty program (“Program”), in accordance with this Notice (“Notice”).

2. SOURCES & CATEGORIES OF DATA

In the context of your participation in the Program, the Company may collect and process the following categories of personal data from the sources listed below:

- Identification data: name, age, date of birth, identity verification details, driving licence information – Source: Data Subject
- Contact details: residential address, delivery/work address (if provided), phone number, email, preferred communication channel, social media account identifiers (when used for login or interaction) – Source: Data Subject, Social Media
- Program registration/account data: registration information, Avis More member number, login/authentication details, preference settings – Source: Data Subject, Avis Digital Channels
- Loyalty activity data: mileage accumulation/redemption history, tier status (Bronze, Silver, Gold), upgrade miles, redemption miles, benefits, dates and times of related actions – Source: Data Subject, Avis Systems, Avis Digital Channels
- Transaction and service usage data: transactions relating to eligible services such as short-term rentals, leasing, subscription mobility services, digital bookings, Pick-Up & Delivery and related services, including transaction date, time, channel, service location, electronic declarations, billing and payment information – Source: Data Subject, Avis Systems
- Consumer and transaction preferences: preferred services, packages, channels, service locations, benefits, ratings and feedback – Source: Data subject
- Internet usage and digital interaction data: use of websites/apps supporting the Program, device and browsing data, referral data, interaction with electronic communications – Source: Data Subject, Avis Digital Channels, Targeted advertising and data analytics providers

3. PURPOSES OF PROCESSING AND LEGAL BASES

Your data are processed for:

- Providing Program benefits and rewards
- Managing your Avis More account, mileage, transactions, tiers and benefits
- Allowing mileage collection and redemption

- Creating a transactional profile to offer benefits and rewards tailored to your needs and preferences

The Company also processes data based on its legitimate interests for:

- Customer support and communication regarding Program participation
- Updates about your account, benefits, tier status and Program operations
- Informing you about benefits, rewards and Program participation
- Account verification, security, fraud prevention and misuse prevention
- Satisfaction surveys, service evaluation and improvement, and development of new products, services and loyalty programs

Processing is based on the Program participation agreement and the Company's legitimate interests.

4. PROFILING WITHIN THE FRAMEWORK OF THE PROGRAM

The Company may create a loyalty / transactional profile to provide personalized communications, recommendations, offers and benefits, and to improve the Program and mobility services. Profiling may use demographic information, account and preference data, transaction history, loyalty activity, digital channel usage and service usage. Profiling is intended solely to provide more relevant communications and offers. Profiling will have an exclusively positive impact, consisting solely of the provision by the Company of personalized updates and offers to you.

5. RETENTION PERIOD

Data are retained for as long as you remain a Program member and for up to ten (10) years after your withdrawal from the Program.

6. RECIPIENTS OF DATA

Processing is carried out by authorized Company personnel under strict confidentiality obligations.

The Company may transfer and/or provide access to your personal data, to the extent strictly necessary and for the purposes described in this Notice, to the following categories of data processors:

- Marketing and communications service providers.
- IT support, maintenance, hosting and infrastructure providers.
- Data analytics and performance measurement providers.

Such processors are bound by confidentiality obligations and act only under the Company's instructions.

Limited categories of data may also be shared with partner companies that provide discounts, benefits and rewards through the Program for the purpose of delivering or redeeming those benefits.

7. DATA TRANSFERS

As a rule, the Company does not transfer personal data outside the European Economic Area (EEA). If transfers become necessary, appropriate safeguards under Articles 44 et seq. GDPR will be applied, including Standard Contractual Clauses approved by the European Commission and any supplementary protection measures. In such case, you have the right to obtain relevant information as well as a copy of the documents relating to those safeguards.

Where required by law or by a competent judicial or administrative authority, the Company may disclose personal data to the extent required.

8. RIGHTS

Subject to applicable law, you have the rights of access, rectification, erasure, restriction of processing, data portability, objection, and objection to profiling.

For requests or to exercise your rights, contact: gdpr@avis.gr

If you believe your rights have not been handled lawfully, you may lodge a complaint with the Hellenic Data Protection Authority (1-3 Kifisias Ave., Athens 115 23, 210 6475600, E-mail: contact@dpa.gr, Complaints submission: https://www.dpa.gr/el/polites/katagelia_stin_arxi).

9. ACKNOWLEDGEMENT

I acknowledge that I have been informed of these terms regarding the processing of my personal data in connection with participation in the Avis More loyalty program, including profiling for personalized updates/offers and the receipt of marketing communications by electronic means, as described above.