

PRIVACY POLICY

We are **The Hertz Corporation**, its rental businesses and subsidiaries operating under the Hertz, Hertz 24/7, Dollar, Thrifty and Firefly brands (together “we”, “us”, and “our”). This policy does not cover our licensees or affiliates or other third parties through whom you may interact with us. This is a high level summary to explain how we collect, processes, store and otherwise use information about you and your rights in relation to that information. For full information, please see the full policy below.

<p>COLLECTION</p> <ul style="list-style-type: none">▪ We may collect information from you in a multitude of ways, including, but not limited to, phone calls, customer service contacts, mobile apps, websites, and other sources, including third party service providers and business partners.▪ We collect information from customers during the process of reservation and rental transactions, such as name, address, and payment card information.▪ We use “cookies” and other electronic tools to collect statistical information about your use of our websites, subject to your instructions.	<p>USES</p> <ul style="list-style-type: none">▪ Information you provide will be used to provide you with the services you request.▪ We will use the contact information you provide to communicate with you to provide these services.▪ We may use your contact details to send you information about our products and services, where permitted by you.▪ We use personal information for our own analytical purposes and to enable us to help our customers by improving our services and websites
<p>SHARING</p> <ul style="list-style-type: none">▪ We may provide your information to designated third party service providers.▪ We do not sell your information to unrelated third parties but may, with your permission, share your information with third parties partners for marketing purposes.▪ Your information may be transferred out of your country or region of residence to countries such as the United States for processing and storage in accordance with applicable law.▪ Your information may be transferred out of your country or region of residence to provide services requested by you.	<p>YOUR RIGHTS</p> <ul style="list-style-type: none">▪ You will have access to review or update Personal Data that is collected from and about you, so you can change any information that is incorrect.▪ We will try our best to accommodate your request, but we reserve the right to impose certain restrictions and requirements.▪ Where we use consent as a basis for processing, you can always withdraw that consent.▪ If you feel that this policy has been violated, we will work with you to resolve your concerns.
<p>RETENTION</p> <ul style="list-style-type: none">▪ We generally keep customer information for as long as we believe necessary for the purpose for which it was collected, or as allowed by law.▪ We use reasonable measures to safeguard Personal Data from theft, unauthorized use, disclosure, or modification.▪ We aim to maintain appropriate physical, procedural and electronic safeguards to protect your Personal Data.	<p>QUESTIONS</p> <ul style="list-style-type: none">▪ We may modify this Policy at any time, but changes will not apply retroactively.▪ We will notify you when we make changes.▪ You may contact us as detailed in this Policy.▪ This Policy was last updated April 2018.

Contents:

- [Scope and Controllers](#)
- [Data collection](#)
- [Purposes for processing](#)
- [International transfers](#)
- [Security](#)
- [Data retention](#)
- [Your rights](#)
- [Complaints](#)
- [Contact us](#)
- [Changes](#)

1. SCOPE & CONTROLLERS

We are **The Hertz Corporation**, a U.S. company, which, together with our subsidiary companies, provides vehicle rental services to our customers under the Hertz, Hertz 24/7, Dollar, Thrifty and Firefly brands (together “**we**”, “**us**”, and “**our**”). We are the **data controllers** for the purposes of this Privacy Policy (“the **Policy**”).

We also operate a network of licensees in provision of our services worldwide and are affiliated to many other companies through ownership. As our licensees, affiliates, and entrusted third-party vendors are independent companies, they are not owned or controlled by us and are not covered by this Policy. **We are not responsible for the privacy practices of our licensees, and other third parties with whom you may transact.**

This Policy covers the information we collect about you in connection with our vehicle rental businesses, which identifies, or can be used to identify, you as an individual (“**Personal Data**”). It does not apply to information that cannot reasonably identify you. For example, but without limitation, aggregated anonymous data, computer operating systems, aggregated preferences, etc. are not Personal Data.

We respect the privacy rights of our customers and are committed to protecting your privacy. This Policy explains our data handling practices with regard to your Personal Data, as well as your rights associated with that data.

2. DATA COLLECTION

We collect Personal Data that you provide on our websites, on third-party websites, on applications, and offline in connection with any inquiries, reservations, rentals or purchases you make in relation to our services. We may collect your Personal Data directly or through our service providers, business partners, discount sponsors, licensees, advertisers and booking channel providers. For further details, see below:

a. TYPES OF INFORMATION COLLECTED may include, but are not limited to:

Personal Information:

<ul style="list-style-type: none">▪ name▪ age▪ date and place of birth▪ gender▪ address▪ email address	<ul style="list-style-type: none">▪ phone number▪ passport number▪ driver’s license or other ID photograph▪ credit score and history▪ criminal history
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Technological Information:

<ul style="list-style-type: none"> ▪ IP address ▪ Device ID ▪ IP address ▪ browser type ▪ language ▪ operating system ▪ mobile device identifiers ▪ geo-location data ▪ state or country from which you accessed our websites ▪ specific webpages visited 	<ul style="list-style-type: none"> ▪ date and time of a visit ▪ websites you visited immediately before and after visiting our websites ▪ number of links and specific links you click within our websites ▪ functions you use on our websites ▪ any reservations, updates, purchases, or other transactions through our websites ▪ data you view or download from our websites ▪ number of times you view any particular advertisements
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Rental Information:

<ul style="list-style-type: none"> ▪ payment card information ▪ video of you and interaction with us ▪ membership organization number ▪ frequent flyer number ▪ loyalty program ▪ organizational affiliations ▪ employee ID number ▪ employer name and contact information 	<ul style="list-style-type: none"> ▪ booking location ▪ rental location ▪ return location ▪ preferences and usage information ▪ charges incurred ▪ purchase prices and details ▪ itinerary information ▪ data related to claims
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Sensitive Data:

We may collect certain Personal Data that constitutes sensitive data in some countries, such as data about health conditions or membership of a trade union. Depending upon applicable local law, we may be unable to process such sensitive data without your consent.

Please note that if you wish to rent with us or our licensees and need to provide sensitive data, we will use that sensitive data for our operational uses as described in this Privacy Policy, subject to your consent where required under applicable law.

b. METHODS AND SOURCES OF COLLECTION may include, but are not limited to:

Online collection:

<ul style="list-style-type: none"> ▪ our websites ▪ our kiosks ▪ our mobile “apps” 	<ul style="list-style-type: none"> ▪ our official third-party social network pages ▪ your computer’s web browser ▪ third party social networks
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Cookies and online data collection

We use cookies on our websites to store information in your computer or mobile device to improve your online experience. Cookies are small text files which let you navigate between pages efficiently, remember your preferences, help us understand how this website is performing and generally improve your browsing experience. Cookies can also help to ensure the advertising you see online is more relevant to you.

Generally, our cookies may perform the following functions:

Essential cookies	Some cookies are vital for the operation of our websites. Without them you would not be able to move through the website and use some of its features. Essential cookies enable information you provide and decisions you take regarding your rental to be remembered from page to page in the booking process. Because these cookies are essential, we do not enable you to choose to disable them on our website.
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Functionality Cookies	We use functionality cookies to allow us to remember preferences you have requested in previous visits including and changes you have made to customise the site to your liking. We also use functionality cookies to provide you with enhanced services such as allowing you to watch a video online. The information these cookies collect is anonymised and used in relation to that website only.
Performance Cookies	We use performance cookies to analyse how our visitors use our websites and to monitor website performance. This allows us to provide a high quality experience by customising our offering and quickly identifying and fixing any issues that arise. These cookies don't collect information that identifies a visitor. All information collected is aggregated and therefore anonymous and is only used to improve how our website works.
Advertising Cookies	Hertz and our advertisers use cookies to serve you with advertisements that we believe are relevant to you and your interests. They are used to limit the number of times you see an advertisement as well as to measure the effectiveness of the advertising campaign. We may also use cookies placed by advertising agencies who may record that you have visited this website and share that information with other advertising organisations to enable targeted advertising to be sent to your computer.
Third Party cookies	Third party cookies are set by a different organisation to Hertz. For example, our websites may contain content embedded from, for example YouTube, and banners delivered for Hertz through an advertising partner's network. These sites may set their own cookies.

If you would like to disable cookies or change the cookie settings on any of our websites that you visit, please go to the **Manage my cookies** link at the bottom of the webpage for full information and to record your preferences.

Our websites are not directed to individuals under the age of 13, and we do not knowingly obtain Personal Data from such individuals.

Apps

With regard to mobile apps, any app's collection and use of Personal Data that is materially different from what's described in this Policy will be supplemented by an individual privacy policy that will require acceptance for that specific app.

As the internet and other eCommerce channels continue to develop, we may deploy and utilize different types of technologies to collect data regarding your visit or usage.

Offline collection:

<ul style="list-style-type: none"> ▪ calls to or from our reservation, customer service, emergency road-side assistance, customer contact or member care centers ▪ interaction with our various licensees, affiliates, and subsidiaries, including car sales and other businesses ▪ in-person at rental locations ▪ in-vehicle or in-equipment technology or through other telematic devices ▪ in connection with a reservation (even an abandoned or interrupted reservation), a rental of a vehicle or equipment, or your purchase of a vehicle or equipment 	<ul style="list-style-type: none"> ▪ transactions you complete with us, our licensees, and agents including options you take, charges you incur and any incidents or accidents that may occur ▪ when you join our membership programs ▪ CDP Sponsors or sponsors of promotion codes, affiliation, or special discount codes ▪ consumer reporting agencies and other companies that have business relationships with us, such as our licensees affiliates and business partners, including airlines, hotels, and insurance companies
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<ul style="list-style-type: none">reservations you make with us through licensees, travel agents or brokers, online or in-person	<ul style="list-style-type: none">Claims Management service providers (either affiliated directly with us, or operated by a third party)
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Depending on the purposes for which we collect and use your Personal Data, as set out in this Policy, the Personal Data we collect from you may be required due to a statutory or contractual obligation, provided on a voluntary basis, or necessary for us to enter into a contract with you.

If you do not provide your Personal Data to us this may result in disadvantages to you. In particular, we may not be able to rent to you. However, unless otherwise stated, not providing your Personal Data will not result in legal consequence for you.

3. **PURPOSES FOR PROCESSING**

Below we have set out the various purposes for which we process your Personal Data. We have also set out the legal grounds for the processing of your Personal Data for each purpose:

- a. OPERATIONS AND SERVICES:** We may use your Personal Data to provide you with the services or products you request from us and to perform other activities related to such services or products, including billing and collection.

We may use your information to communicate with you regarding any reservation you initiate or rental transaction; your membership/status in one of our membership programs; or changes to the terms or features of any of our membership programs to which you belong.

Legal grounds: to perform our contract with you or to take steps at your request prior to entering into a contract with you.

- b. OUR MARKETING:** We may use your Personal Data to provide you with marketing information, special offers, and promotions via various means including e-mail, in accordance with applicable law.

Legal grounds: on the basis of your consent. However, where permitted by applicable law we may lawfully use your Personal Data to send you such marketing communications (including via email) for these marketing purposes where necessary for our legitimate interests, which include promoting our products and services, special offers and promotions which may be of interest to you.

You can unsubscribe from receiving such messages at any time by contacting us at the details below under "Contact Us" as well as the unsubscribe link in each e-mail message. Please note that if you exercise these choices, you will continue to receive communications concerning your account and products and services you requested, and in response to any requests for information by you. Please also note that this process may take some time to complete, consistent with applicable law.

- c. THIRD PARTY MARKETING:** We may also share your Personal Data with a sponsor or other third party that provides you with special offers or promotions that may be of interest to you ("**Third Party Provider**") where permitted.

Legal grounds: on the basis of your consent. You may instruct us at any time not to share your Personal Data covered by this Policy with such Third Party Providers where you have previously consented.

Please note that (i) this process may take some time to complete, consistent with applicable law; and (ii) even after such process is completed, your personal and other information may continue to be shared with CDP Sponsoring Organizations, our affiliates (including affiliated websites under common ownership or control), and designated service providers in accordance with this Policy.

- d. OTHER THIRD-PARTY PURPOSES:** As part of our Services, we have engaged with third-party organizations that sponsor the CDP, member, employee, or other number used by you to complete a rental or purchase (“Sponsoring Organization”). As a result of our relationship with these Sponsoring Organizations, we may be under an obligation to provide the Sponsoring Organization or their designee with details about you and your use of our services as they relate to your relationship with the Sponsoring Organization.

Legal grounds: to perform our contract with you where you use a CDP, member, employee or other number.

Sponsoring Organizations may have different privacy practices than we do, and we recommend you review the Sponsoring Organization’s privacy policy for the purposes which they will use your information. As we do not control the Sponsoring Organization’s privacy practices, they may not be the same as ours. However, because of your relationship with the Sponsoring Organization, they can use Personal Data which they receive from us for the purposes specified in their privacy policies or similar statements, including authorizing their designees to receive and process your information on their behalf.

- e. NORMAL COURSE OF BUSINESS:** We may also process your Personal Data and other information if such processing is necessary:

- i. to comply with the law or in response to a subpoena, court order, law enforcement request, or other legal process;

Legal grounds: where it is necessary for compliance with a legal obligation to which we are subject.

- ii. to protect the interests, rights, safety, or property of us or others;

Legal grounds: where necessary for our legitimate interests, which are to protect such interests, rights, safety and property;

- iii. to enforce any terms of service on our websites or the terms and conditions of any rental, purchase, or utilization;

Legal grounds: for our legitimate interests, which are to protect us and enforce such terms of service or terms and conditions.

- iv. as part of a business transaction where all or some of our assets are bought, sold, or otherwise transferred by act of law or contract; and

Legal grounds: for our and third parties legitimate interests.

- v. to operate our systems properly.

Legal grounds: for our legitimate interests, which are the proper running of our systems and our business in order to provide our products and services to you and other customers.

- f. **WEBSITES:** If you use our websites we may process your Personal Data as follows:
- i. **Aggregated or anonymised information:** We may share with other third parties aggregate or anonymized information about our website users, such as your use of this website or other websites, and the services provided on this website or other websites, as well as any rental, purchase, or utilization information.
 - ii. **Social media:** If you participate in certain public features of our websites, apps, or social media websites/apps, please note that any information you or others voluntarily disclose through use of such features, becomes available to the public and/or other users whom you have designated.

If you choose to provide access credentials to designated individuals, please be aware that any information you provide to us may be visible to such individuals.

We are not responsible for the information that you or others choose to disclose publicly and neither our nor others' use of such information is subject to this Policy.

- iii. **Links to third parties:** We may provide links to third-party websites, or may be linked to from third-party websites. Since we do not control third-party sites, and we are not responsible for any information you may provide while on such sites, we encourage you to read the privacy policies on those websites before providing applicable third-parties with your information.

4. **INTERNATIONAL TRANSFERS**

Some of the uses and disclosures mentioned in this Policy may involve the transfer and processing of your Personal Data to and in various countries around the world that may have different levels of privacy protection than your country of residence or interaction with us.

The Hertz Corporation and its subsidiaries in the U.S. (individually and collectively, the "Company") participates in the **EU-U.S. Privacy Shield Framework** (the "Framework"). The Company's participation in the Framework applies to Personal Data received in the United States from the European Union ("EU"). We are committed to subjecting such EU Personal Data to the Framework to the extent that we have received it in reliance on the Framework, including its principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. To learn more about the Framework, visit the U.S. Department of Commerce's Privacy Shield List [here](#).

Where we transfer your Personal Data outside of the European Economic Area other than to the Company or any other organization in the U.S. which participates in the Framework, or to a country which is not covered by an adequacy decision from the European Commission we implement standard contractual clauses. You can request a copy of these standard contractual clauses by contacting us as set out in "Contact Us" below.

5. **SECURITY**

We use reasonable administrative, technical, personnel, and physical measures (a) to safeguard Personal Data against loss, theft, unauthorized use, disclosure, or modification; and (b) to ensure the integrity of your Personal Data. To help us protect your privacy, you should maintain the secrecy of any logon IDs and passwords, Member numbers, or other identifiers or credentials you may have set

up or were provided with in connection with your participation in or use of our products, services, or websites.

As you may be aware, there is no completely secure method of transmitting or storing data. Although their physical characteristics are different, postal mail, telephone calls, text messages, faxes and transmissions over the Internet or wireless networks all present possibilities of loss, misrouting, interception and misuse of the data that is transmitted. If you have reason to believe that any account with us is no longer secure, you must immediately contact us.

We try to strike a balance between the security of your data and your convenience. As a result, we may sometimes use a method of communication that is less secure than a less convenient alternative. For example, but not limitation, we may send you an e-mail or a text message in unencrypted form (i.e. instantly readable) because many of our customers are unable to access encrypted (i.e. coded) e-mail or messages. This means that our message, if misrouted or intercepted, could be read more easily than encrypted messages. Such messages may contain Personal Data. Please do not include confidential information, such as your credit card number or account passwords, in any e-mail or text you send to us or on any posting you make to a public area of a third-party social network page, especially since any such posting immediately becomes public. For a more secure way to communicate with us over the Internet, please click on the "Contact Us" link on any of our websites.

6. DATA RETENTION & INTEGRITY

We retain personal data about our customers for as long as necessary for the purposes for which it was collected, or unless otherwise allowed by law. Information is stored and accessed in various locations and cloud services and storage may be utilized. Servers which store information are primarily located in the United States and Europe, although storage may occur in other locations as well.

7. YOUR RIGHTS

- a.** You have the right to request access to, review, and update your Personal Data covered by this Policy, and can request this by contacting us at the details set out in "Contact Us" below. While we will make reasonable efforts to accommodate your request, we also reserve the right to impose certain restrictions and requirements on such access requests, if allowed or required by applicable laws. If you are a member of one of our membership or rewards programs, you may update your member profile by logging into your applicable member profile.
- b.** You have the right to:
 - i. request rectification of your Personal Data where the information that we hold about you is incorrect or incomplete;
 - ii. object to the processing of your Personal Data for direct marketing purposes, including profiling to the extent it relates to direct marketing;
 - iii. object to the processing of your Personal Data (including profiling) where our legal basis for processing your Personal Data is that such processing is necessary for our legitimate interests;
 - iv. request erasure of your Personal Data in certain circumstances;
 - v. request restriction of your Personal Data in certain circumstances;
 - vi. receive (or ask us to transmit to another organization) your Personal Data that you have provided to us which we process by automated means where our processing is either based on your consent or is necessary for the performance of a contract with you; and
 - vii. object to automated decision making (including profiling) in certain circumstances.
- c.** In addition, where we process your Personal Data on the basis of your consent, you can withdraw that consent at any time.

You can make a request to us to exercise any of these rights by contacting us as set out in "Contact Us" below.

8. COMPLAINTS

You have the right to lodge a complaint with a competent data protection supervisory authority in your jurisdiction.

Should you have a concerns or complaints about our handling of your Personal Data, you may contact us directly via the methods described below in the "Contact Us" section. We will work to respond and resolve your complaints in an expeditious manner.

9. CONTACT US

Please contact us by emailing euprivacy@hertz.com or writing to the address below if you have any questions, wish to exercise your rights of access, or seek other assistance as described above.

Hertz International
Data Protection Officer
11 Vine Street
Uxbridge
Middlesex
UB8 1QE
UK

We do business in many countries and aim to comply with the privacy laws applicable to the Personal Data we collect and use.

10. CHANGES

We reserve the right to change this Policy at any time for any reason by posting revisions on this Webpage or on applicable apps or other sites. Such changes will be effective upon posting, but will not apply retroactively. Whenever we make a change, we will note the date of such update in the introductory paragraph above.