

## APPLICATIONS PASS2RENT PRIVACY POLICY

### I. GENERAL PROVISIONS

1. This Privacy Policy explains in detail how the PASS2RENT mobile app uses your personal data when you apply to enable 24/7 pickup / drop-off of their rented car, or make a new reservation. Please read this Privacy Policy carefully.
2. We use the personal data we collect to ensure the smooth provision of services and to continuously improve the quality of services and the functioning of the PASS2RENT mobile application ("**Mobile Application**"). If we do not receive the requested personal data, we will not be able to provide you with services related to their use.
3. In processing your personal data, we comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("General Data Protection Regulation") (hereinafter referred to as the "**GDPR**"), with the other applicable legislation governing the protection of personal data and with this Privacy Policy.
4. The terms used in this Privacy Policy are the same as those used in the GDPR and the PASS2RENT Vehicle Rental and Service Terms and Conditions, unless otherwise stated in this Privacy Policy.
5. We may update this Privacy Policy and we recommend that you review it periodically. We will notify you of any changes by posting the updated Privacy Policy on the Mobile App.

### II. WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

6. The data controller (hereinafter referred to as "We", "Company"), which processes the personal data collected in the Mobile App and provided by you (the user) when renting a vehicle provided by the Operator, is: UAB "Odifis", company code: 302518756, address: K. Petrausko g, 26, Kaunas, Lithuania; tel. No.: [...]; e-mail: [contact@pass2rent.com](mailto:contact@pass2rent.com).

### III. GROUNDS FOR PROCESSING PERSONAL DATA

7. We process your data in accordance with:
  - 7.1. **your consent(s)** (Article 6(1)(a) GDPR):
    - 7.1.1. which you have given by explicitly confirming that you have installed the Mobile App on your device and selected its settings;
    - 7.1.2. which you have explicitly confirmed by uploading a photo of both sides of your driving licence and a photo of your face to the Mobile App for the purpose of an online check of your identity and driving licence;
    - 7.1.3. 's separate consent to inform you about pending task to in the Application or that Operator made change on your rent *push notifications* on your phone;
    - 7.1.4. the permission you have separately given to the Mobile App to access the camera integrated in your device.
  - 7.2. **on the basis of our contractual obligation, i.e. the contract we have concluded with you in relation to the Operator's Vehicle for Hire services** (Article 6(1)(b) GDPR), i.e. the terms and conditions of service of the Operator's Vehicle for Hire application PASS2RENT.
  - 7.3. **on the basis of a legal obligation** (Article 6(1)(c) GDPR), such as tax, financial accounting, road safety and other legislation.
  - 7.4. **our legitimate interests** (Article 6(1)(f) of the GDPR), fraud prevention, analysis, debt management, transmission of data on debts to debt collection companies and credit rating agencies, credit assessment, network and information security, sharing evidence of possible criminal activities with public authorities,

locating the vehicle by means of GPS transmitters to ensure security and to enforce the contract for car rental and services concluded with you.

8. You can opt out of all and any active *push notifications* on your phone by changing your device's operating system settings.

#### **IV. WHAT PERSONAL DATA DO WE COLLECT AND FOR WHAT PURPOSES DO WE USE IT?**

9. When you install the Mobile App on your mobile device and choose your settings. Your mobile device will only work properly if you allow the Mobile App to use the following device data: device operating system (if it is upper Android 7, or IOS 13.0) and device model . If you do not consent to the Mobile App receiving this data, please do not install the Mobile App on your device and do not select its settings. If you have already done so without carefully reading this Privacy Policy on the Google Play and App Store platforms, please remove the Mobile App from your device before installing it.
10. When you create an account on the Mobile App. If you wish to start using the Mobile App, you must register for the Mobile App by reading and agreeing to the PASS2RENT Terms and Conditions, the Mobile App Privacy Policy and providing the required personal data. You must provide the following data: your name, contact information (telephone number, email address), residential address, card information (type of card, name of bank, card number, validity period), a photo of your driver's licence on both sides, the data on the front of your driver's licence (name, surname, personal identification number, date of birth, expiry date of the driver's licence, a photograph of your face and, if necessary, a digital copy of the driving licence).
11. We only need a photo of your face, a photo on your driving licence and the details on your driving licence when you rent vehicles provided by the Operator to verify your identity and your right to drive the vehicles. For this purpose, in accordance with the requirements of the individual Operator, we need to check your driving licence before we start the service, and to check whether the image of your face in the photo you have taken via the Mobile App matches the image of your face in the photo of your driving licence (automatically according to the algorithms chosen by the Service Provider), and that the driving licence is valid. These data are transmitted to operators.
12. When using the mobile app. When you use the Mobile App, we record your actions (e.g. booking Vehicles, locking/unlocking Vehicles, etc.) and collect other data related to your use of the Services (Vehicles used, date and time of use, locations where the Vehicle has been picked up and dropped off, the Vehicle's route, speed, use of the fuel etc.). The Mobile App may use the location data of your device, the camera integrated in your device and send you messages from the Mobile App, if you have given your permission in the Mobile App and/or in the settings of your device. If you do not allow the use of these data/features, some features of the Mobile App may not work and you may not be able to start using the PASS2RENT services.
13. Your contact details (email address, telephone number (for text messages)) may be used to provide information relating to the services used, changes to the terms and conditions of the car rental and services, price list, etc. The above information may also be sent as active notifications on the Mobile App, subject to your consent. You may opt-out of Mobile App notifications at any time by changing the operating system settings on your device.
14. We process your personal data to provide our services for operators for the purposes of personalised direct marketing (including direct marketing by our Operators) by email. You have the right to withdraw your consent at any time by phone: [...]; by email: [contact@pass2rent.com](mailto:contact@pass2rent.com) at any time by clicking on the "Unsubscribe from newsletters" link in the email or by de-selecting to receive marketing communications in the Mobile App.
15. Use of cars provided by the operator for hire. Each Vehicle is equipped with an electronic system which records the location of the Operator's Vehicle, the distance travelled by the Vehicle, the time

of use of the Vehicle, the speed of the Vehicle and any other data relating to the Vehicle and the use of the Vehicle, and transmits to us such data.

16. If you use the Vehicle to connect your device to wired or wireless devices in the Vehicle, including but not limited to navigation, multimedia systems, the data from your device will be stored in the Vehicle unless you delete it in accordance with the Vehicle manufacturer's instructions. You must remove your device data from the Vehicle's device memory yourself when using the Vehicle. If you do not remove the device data, We accept no liability in connection therewith.
17. When you register on the Mobile App and use the rental vehicles provided by the Operator, we have the right, to the extent permitted by applicable law and taking into account Our legitimate interests (risk assessment, protection of Our assets, ensuring the safety of third parties and their assets, collection of fees for the services provided), to take into account Your creditworthiness, debt, driving record, breaches of the relevant road traffic regulations, the number of insured events related to You (such as, history of any insurance claims relating to speeding) during the period of use of the Vehicle and to make decisions based on this information which may affect the way in which We provide Our services to You (if You already use Our services).
18. In the event of an accident involving a Vehicle, we will process the personal data collected in connection with the accident in order to provide compensation to the accident victims together with our and/or the accident victims' insurance companies.

## **V. TO WHOM DO WE PASS ON YOUR INFORMATION?**

19. We may use third-party services (third-party data centres, servers, document and photo verification, administration, payment, auditing, accounting, legal and advisory services, debt collection, mobile app usage analysis and statistics, direct marketing services, email applications, short messages, etc.) or work with partners to provide services where we need to have access to your personal data to a certain extent. In this case, we ensure that the third parties will comply with the obligations of confidentiality and adequate protection of personal data.
20. If necessary, your personal data may be provided to the competent state and municipal authorities in accordance with applicable law and/or our legitimate interests.
21. In the event of an accident involving the Vehicle, your data will be passed on to insurance companies and, if necessary, to other parties involved in the accident.
22. Based on the Vehicle Data we hold, we have the right and, in certain cases, the obligation to pass on information about road traffic offences (e.g. speeding, drink driving) to the relevant authorities (e.g. the police).

## **VI. HOW LONG WILL WE KEEP YOUR DATA?**

23. Personal data collected for the provision of PASS2RENT services must be kept for as long as necessary to achieve the purposes for which the personal data were collected, except in the following cases, where the data may be kept for longer than required:
  - 23.1. to comply with any legal obligation that requires the processing of the data provided;
  - 23.2. preserve information relating to suspected criminal acts;
  - 23.3. to bring, exercise or defend legal claims.
24. Your personal data will be stored for as long as the contract with the Operator is valid.

## **VII. YOUR RIGHTS**

25. In order to enable you to exercise your rights as a data subject, we aim to ensure that your personal data is processed in a transparent manner. As a personal data subject, you have the following rights:

- 25.1. you have the right to be informed about the processing of your personal data and to request access to them or copies of your personal data so that you can know for what purposes your personal data are processed, how long they will be kept, etc.;
  - 25.2. you have the right to request that we amend or update your personal data if it is inaccurate or incomplete;
  - 25.3. you have the right to request that all or some of your personal data be temporarily or not at all processed;
  - 25.4. you have the right to request that we cease processing your personal data if we no longer have a legitimate interest or a legal necessity to process them;
  - 25.5. you have the right to request the erasure of your personal data used to send direct marketing communications in certain cases, such as when personal data is processed for direct marketing purposes;
  - 25.6. you have the right to request the transfer of your personal data in a structured, computer-readable format to another service provider.
26. We do not use automated decision-making processes, including profiling, in the processing of your personal data, which may result in legal consequences for you or have similar significant effects. However, when we process your personal data for direct marketing purposes, we may classify you as a relevant customer category and you have the right to request human intervention to express your views or object to such classification.
  27. If you intend to exercise your rights, you should write to us by email, but you will first need to prove your identity by electronic or other means so that we can properly identify you in accordance with the law.
  28. We will provide the information without undue delay, but no later than one month from the date of your request. We will provide the information to you free of charge, but if the requests are manifestly unfounded or disproportionate, in particular because of their repetitive nature, we may charge you a reasonable fee to cover our administrative costs, or we may refuse to comply with your request.
  29. You have the right to complain about our data processing activities, but we will first try to resolve any misunderstandings with you. If you remain dissatisfied with Our response, you have the right to lodge a complaint with the State Data Protection Inspectorate [www.vdai.lrv.lt](http://www.vdai.lrv.lt).

## **VIII. PROTECTION OF YOUR DATA**

30. We use appropriate organisational and technical measures to ensure the security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. These measures have been chosen taking into account the risks to your rights and freedoms as a data subject.
31. We strictly control access to the personal data we process by limiting it to only those of our and/or the Operators' employees who need the personal data to perform their work and monitor their use of the access granted. Both Our and the Operators' employees who have access to personal data are made aware of the requirements for the protection of personal data and ensure the confidentiality of the personal data processed.
32. We regularly monitor our systems for possible breaches or attacks. However, it is impossible to guarantee the security of information transmitted over the internet. In light of this, your use of an internet connection to provide information to Us via the Mobile App is at your own discretion and risk.
33. We provide access to personal data with the appropriate level of passwords and draw up agreements to protect confidential information with the people who have access to your personal data.

## **IX. FINAL PROVISIONS**

34. If you have any further questions or comments, you can contact us by email at [contact@pass2rent.com](mailto:contact@pass2rent.com) or by phone [...].
35. Privacy Policy may be reviewed once per calendar year or in the event of changes in the legislation governing the processing of personal data.
36. Privacy policy and any amendments thereto shall take effect from the date publication.