PRIVACY POLICY

SHARED MOBILITY A/S

This Privacy Policy explains how SHARED MOBILTY A/S ("we", "us") processes your personal information.

1. DATA CONTROLLER

The entity responsible for the processing of your personal information is:

Shared Mobility A/S

CVR-nr. 26045215

Park Allé 355

2605 Brøndby

gdpr@ehiglobal.dk

+45 70 70 12 00

2. INTRODUCTION

It is important to Shared Mobility A/S that your personal data is collected and processed securely and lawfully. This statement ("Privacy Policy") describes how we collect and process your personal data.

"You" and "your" mean each and every person, who rent a car, who is registered as an authorized additional driver, who subscribe to our newsletter, who use our website, or who are in contact with us in another way.

3. DESCRIPTION OF THE PROCESSING

Purpose	Categories of personal data	Source of the personal data	Legal basis for the processing	Recipients	Data retention
Renting a vehicle					
Car rental Personal data is used to provide you with the services or products you request from us and to perform other activities related to such services or products, including credit assessment (Mini-Lease), fulfillment of the rental agreement, sending booking related e-mails (e.g., your booking confirmation, information about pick up etc.), billing and general communication regarding any reservation or rental transaction you initiate. **Customer service** Personal data is processed for general service and support regarding customers inquiries, loyalty program, complaints, claims, roadside assistance, accident management assistance, theft etc. **Use of infotainment systems and vehicle manufacturer apps** Personal data and other information may be transferred and stored if you pair a	We process the following categories of personal data about you: **Ordinary personal data:** • <u>Contact information:</u> *Name, *address/local residence, phone numbers, e-mail addresses, company name, company code. • <u>Renting information:</u> *Driver's license information, including date of birth. Photographs you submit of you and your driver license. Insurance information. *Passport information. Proof of residence.	We collect your personal data from the following source(s): • Directly from you. Third parties provide us with additional information including: • Enterprise Holdings who provide us information regarding your rental transactions. • Referral sources, such as third-party online booking sites and car rental companies with whom we have a business partnership with (who provide us	We process your personal data on the following legal bases: • **Article 6.1.a** (consent) • **Article 6.1.b** (necessary for the performance of the contract between you and us) • **Article 6.1.c** (legal obligation) e.g. BEK nr 992 as of 27/06/2022 • **Article 6.1.f** (necessary for the pursuit of legitimate purposes of us) • To communicate important information about your rental and provide you service. These communications, which are transactional in	We share your personal data with: • Suppliers that we work with to assist our company, including service providers, IT-systems, technical support, supply services. • Business partners including for satisfaction surveys, customer support, handling over keys, insurance companies, credit and financial institutions, debt collection providers, etc. • Group entities (meaning Enterprise Holdings and their group companies,	We will retain personal data as long as necessary for the purposes stated: **Potential customers:** Customer inquiries are deleted within 3 months after the request has been finally handled and has not resulted in a car rental agreement. **Active customers:** We may retain personal data for up to 6 years from the data of the rental with the following exemptions: Exemptions: • Customer inquiries are generally kept for a maximum of 6 months unless it is necessary to

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mobile device with our vehicles' navigation or infotainment systems and choose to use OnStar, Apple CarPlay, Android Auto or other similar third-party software or services on the vehicle or if you choose to use any navigational features on the vehicle's infotainment systems or other device. **Surveys** Personal data is used to follow up on our service via customer satisfaction surveys. **Statistics** Personal data is used to compile internal statistics. **Video surveillance** For security and crime prevention, there may be video surveillance at some of our locations.	Personal preferences. Footage of you from our video surveillance. RA no./reservation no. Total charges. Kilometers driven. *CPR-no. where you require a rental on credit payment terms (Mini-Lease). • <u>Transaction information:</u> Vehicle rental information, rental and return locations. *Dates and time of the rental. Type of rental and your vehicle preference. Ancillary products purchased. Any preferences or special requirements you may have. Airline and flight number. Billing information. Charges. Payments. Credit Card information. • <u>Information processed in connection with roadside assistance or theft:</u> Location information when handling roadside assistance or theft (GPS position), technical data	general contact information and a booking confirmation number to facilitate the rental) • Your insurance provider (general contact and policy information). • Road assistance companies. • Insurance companies. • Parking companies • Public authorities. • Credit and financing partners. • Customer survey providers (your response to our customer service surveys). • Hotel, airline and membership clubs who provide us your general contact information and booking information.	nature, will be sent to you via email, text, or calls. • To assist us in providing better products and services: for example, to evaluate the performance of our staff, to assess the quality of products and services received and to help us improve our websites, facilities, and services. Unless where consent may be required by applicable law, your feedback may be requested via email, text, or call. • To compile statistics and analysis about our customers' use of our websites, products, and services. These statistics are used only to enable us to provide better customer service, products, features and functionality to you and other customers in the future. • To protect our legal rights and manage the security of our networks and property, including to protect our websites from spam and abuse. For example, we will use	Semler Gruppen A/S and their group companies) • Public authorities.	retain an inquiry for a longer period of time. This will be the case if; (i) the request is related to a rental agreement and is relevant to document for a longer period of time, or (ii) if the request is expected to lead to an official complaint, legal proceedings or the like. • Fines and parking fees are kept until they are paid. If the customer does not pay, the fine is re-invoiced, and the data retention will then be for 5 years, from the end of the year of invoicing. • Personal data stored in the vehicles' navigation or infotainment systems will be deleted when you return the car in connection with cleaning of the car. You can also by yourself delete the personal data from these systems or devices before the vehicle is returned.

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	from the car, customer complaints or inquiries. • <u>Loyalty and affiliation information:</u> Enterprise, Alamo, or National rewards and loyalty information. Online user account details. Corporate Account ID numbers. Membership numbers. Frequent flyer or travel partner affiliations. • <u>Claims information:</u> Information related to details of accidents, including that of any third parties such as involved individuals, witnesses. The drivers contact information and driver's license information. Information about the incident to determine who is at fault. Credit repair details. Details regarding your vehicle repair needs and your onward mobility needs. **Special categories of personal data:**		CCTV to ensure the security of some of our premises. • For loss prevention, we maintain a record of individuals whose past interactions with us indicate they may present a non-payment or safety risk. • To receive, use and share your information with third parties to prevent fraud and protect our business interests and rights, privacy, safety and property, or that of individuals and the public. We will do this to respond to law enforcement request, collect unpaid bills, to avoid liability for penalties you incur (e.g., traffic citations) and for claims processing purposes. • To use and share your information with third parties to permit us to pursue available remedies or limit damage that we may sustain and to enforce the terms of any rental agreement or our websites' terms and conditions.		• CPR-no. will be deleted immediately after the credit assessment. • Video recordings are deleted after 30 days. • Personal data collected in connection with surveys will be stored for up to 1 year after your participation. • Accounting records is kept according to the national legislation (5 years from the end of the financial year to which the material relates pursuant to section 10 of the Danish Bookkeeping Act.) **Business to business:** Personal data is included as part of the customer data and is retained accordingly. Additionally, the personal data is included as part of the agreement with the business partner and is stored until the cooperation is terminated and claims no longer can be set forth under the agreement.

Purpose	Categories of personal data	Source of the personal data	Legal basis for the processing	Recipients	Data retention
	• Information related to details of personal injuries in accidents, including that of any third parties such as involved individuals, witnesses and police reports (claims information). **Criminal matters or criminal convictions:** • Information related to police reports (claims information).		• Unless where consent may be required by applicable law, to send you certain opportunities and services that may be of interest to you. These will include upgrade announcements, communications regarding an incomplete online membership form or reservation, and offers related to other services and products we offer. Some of these offers will be received in advertising on non-Enterprise sites, including on social media. • **Section 8 of the Danish Data Protection Act** for information about criminal convictions and offences when out legitimate purpose clearly outweighs yours. • **Section 11 of the Danish Data Protection Act** for information regarding national identification number (consent).		

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Marketing and events					
Marketing We may process your personal data for marketing purposes, including targeting our communication with you based on your interest and send you relevant news, campaigns, offers, etc. For example, with your consent, we may send you an e-mail after you return from a car rental with offers based on your booking history, to offer you inspiration for your next car rental. We may also use your booking history to provide you with a discount for an upgrade. We may also use your personal data to exclude you from advertisements on websites which are no longer relevant for you. **Competitions** Personal data is processed in connection with your participation in our competitions or where our product is included as a prize. **Events** We use your personal data in connection with events.	We process the following categories of personal data about you: **Ordinary personal data:** • <u>Personal details and contact information:</u> Name, e-mail address, address, phone number, marketing preferences, feedback on services provided, product interests. • <u>Information about the rented product:</u> Information regarding your reservation and car rental. • <u>Information regarding competition:</u> Other information you provide to us in connection with a competition. As well as information about the product (the prize).	We collect your personal data from the following source(s): • Directly from you. • Online sources, e.g., social media that are publicly available. • Third-party cookies • Enterprise Holdings who provide us information regarding your use of the website Enterprise.dk.	We process your personal data on the following legal bases: • **Article 6.1.a** (consent) • **Article 6.1.f** (necessary for the pursuit of legitimate purposes of us) • To assist us in providing better products and services: for example, to evaluate the performance of our staff, to assess the quality of products and services received and to help us improve our websites, facilities, and services. • Our interest in marketing our products and service, including our interest in adapting the marketing to our website visitors, customers and social media user's interests. • Where permissible, to develop a profile of you and your interactions with us so that we can provide tailored offers, opportunities and services that may be of interest to you. • Unless where consent may be required by	We share your personal data with: • Suppliers including IT providers, support, webhosting, communication platforms, advertising agencies, marketing providers. • Business partners • Group entities (meaning Enterprise Holdings and their group companies, Semler Gruppen A/S and their group companies)	We will retain personal data as long as necessary for the purposes stated: We may retain personal data for up to 6 years from the data of the rental with the following exemptions: • We process your name and e-mail as long as you are subscribed to our newsletter and for up to 2 years from revocation of consent to receive marketing from us. • Events: pictures and video recordings from events etc. will be deleted after 1 year, or when they no longer have a marketing relevance, unless the material is stores for historical purposes. • Personal data collected for the purpose of being able to participate in a competition is deleted 3 months after the duration of the competition.

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			applicable law, to send you certain opportunities and services that may be of interest to you. These will include upgrade announcements, communications regarding an incomplete online membership form or reservation, and offers related to other services and products we offer. Some of these offers will be received in advertising on non-Enterprise sites, including on social media.		Information about the winners can be processed for a longer period, depending on the product (the prize) • We will retain personal data collected via marketing cookies for up to 2 years.
Website and SoMe					
Websites Personal data is collected through your use of our websites. We process this personal data, for example, to optimize the user experience on our websites (e.g., Mini-lease.nu), quality purposes and the services we offer. See our cookie policy for more information: Mini-lease.nu and Enterprise.dk. In addition, personal data is processed for online car rental and other services that we offer via our websites. **Chat**	We process the following categories of personal data about you: **Ordinary personal data:** • Car reservation on website: name, email address, phone number, start and end date for the reservation, rental location, type of rental and your vehicle preference. • Information obtained in connection with chat:	We collect your personal data from the following source(s): • Directly from you • Social media content you have made available to the public. • Enterprise Holdings who provide us information regarding your use of the websites Enterprise.dk etc.	We process your personal data on the following legal bases: • **Article 6.1.a** (consent) • **Article 6.1.b** (necessary for the performance of the contract between you and us) • **Article 6.1.f** (necessary for the pursuit of legitimate purposes of us) The legitimate purpose is to be able to provide the services that you have requested, to	We share your personal data with: • Suppliers including IT providers, support, webhosting, communication platforms. • Business partners, including advertising agencies, marketing providers. • Group entities (meaning Enterprise Holdings and their group companies, Semler Gruppen A/S	We will retain personal data as long as necessary for the purposes stated: We may retain personal data for up to 6 years from the data of the rental with the following exemptions: • Chat correspondence via Enterprise.dk is deleted within 6 months of the request being finally answered, unless these are in the nature of inquiries which can lead to

Purpose	Categories of personal data	Source of the personal data	Legal basis for the processing	Recipients	Data retention
We process your personal data when you contact us via chat on the website, Enterprise.dk. **SoMe** Shared Mobility is present on several social media platforms for the purpose of image branding, product marketing and recruitment purposes. When you visit our pages on the social media, such as Facebook/Instagram and LinkedIn or our websites, personal information is collected about your behavior using pixels/cookies in accordance with the consent you might have given the supplier. This also applies even if you do not have an account on the social media in question. When you visit our page on Facebook/Instagram and/or LinkedIn we receive anonymous statistics about e.g., demography and geography from Facebook and LinkedIn regarding visitors to our website and / or our Facebook or LinkedIn page via the plugins ("Facebook Pixel" and "LinkedIn Insight Tag"). In this respect Shared Mobility is joint controller with our suppliers of social media. This is regulated under "Joint control" below in this Privacy Policy.	name, email, phone number and chat correspondence. • Browser information including: Web logs, Geo-location, IP address, etc. • Information you have made available via settings at i.e., Facebook, Instagram and LinkedIn, your reactions to our posting and your sharing thereof as well as any comments to our post.		be able to further develop and optimize the user experience on our websites as well as being able to help you and guide you via our chat. • To compile statistics and analysis about our customers' use of our websites, products, and services. These statistics are used only to enable us to provide better customer service, products, features and functionality to you and other customers in the future.	and their group companies)	actual complaints, legal proceedings and the like. • Cookies: The expiration date of our cookies is described in our cookie policy. • Browser information: We store data regarding your use of our websites for up to 2 years after you last visited the website.
Administration of applicants/vacancies					

Purpose	Categories of personal data	Source of the personal data	Legal basis for the processing	Recipients	Data retention

Recruitment
 	
We process your personal data when you apply for a job with us.
	We process the following categories of personal data about you:
	
	Ordinary personal data:
	
	• Name, email, telephone number, home address, date of birth, marital status, information about relatives, CPR no. or similar, nationality, gender, information on previous employment and references, educational history, professional qualifications, language and other competencies, results of personality type and skills tests, photos and video clips, linguistic and professional preferences and other personal information contained in applications, statements and CV.
	
	• In addition, for applicants under the age of 18, information about legal guardians is processed.
	
	• For certain positions in the group, security
		We collect your personal data from the following source(s):
		
		• Directly from you
		• Group entities
		• Online sources, e.g., social media that are publicly available.
		• From third parties including:
		  ○ Previous employer
		  ○ Previous employees
		  ○ Other third parties including bureaus for background checks, public authorities regarding security clearance and recruitment bureaus.
			We process your personal data on the following legal bases:
			
			• **Article 6.1.a** (consent)
			
			• **Article 6.1.b** (necessary for the performance of the contract between you and us)
			
			• **Article 6.1.f** (necessary for the pursuit of legitimate purposes of us) Our legitimate interest is to ascertain the selection and employment of the right candidate for our business.
			
			• **Article 9.2.b** (necessary for the purpose of carrying out obligation in the field of employment, social security, and social protection) in accordance with section 12 in the Danish Data Protection Act
			
			• **Article 10, Section 8 of the Danish Data Protection Act** for information about criminal convictions and offences.
				We share your personal data with:
				
				• Suppliers that we work with to assist our company, including IT providers, service providers, support.
				• Group entities (meaning Enterprise Holdings and their group companies, Semler Gruppen A/S, and their group companies
				• Keeper of the minutes
				• Public authorities including the police regarding security clearance.
					We will retain personal data as long as necessary for the purposes stated:
					
					• Personal data on applicants who are not employed are stored for up to 6 months after final rejection unless the applicant has consented to a longer retention.
					• Personal data on applicants who are employed are transferred to the employee files and are stored in accordance with the retention periods stated in our Privacy Policy for employees.

Purpose	Categories of personal data	Source of the personal data	Legal basis for the processing	Recipients	Data retention
	clearance is required. We will therefore cause one to be performed if you are to perform such a job. **Sensitive personal data** Personal data regarding trade-union membership and data concerning health. **Information about criminal convictions and offences:** Violations of laws subject to criminal liability, criminal records.		• **Section 11 of the Danish Data Protection Act** for information regarding national identification number.		

4. JOINT CONTOLLER

4.1 SHARED MOBILITY A/S AND FACEBOOK ARE IN SOME CASES JOINT CONTROLLER FOR PROCESSING YOUR PERSONAL DATA ON FACEBOOK

The entities responsible for the processing of your personal information are:

Shared Mobility A/S
CVR-nr. 26045215
Park Allé 355
2605 Brøndby
gdpr@ehiglobal.dk

Facebook Ireland Ltd.
4 Grand Canal Square
Grand Canal Harbour
Dublin 2, Ireland

Purpose	Categories of personal data	Source of the personal data	Legal basis for the processing	Recipients	Data retention
Social media and cookies					
Social media Your personal data are collected when you visit our pages at social media, including when you communicate with us through comments and directs messages on social media. We use Facebook for marketing on social media, posts at our company's page, user statistics and analysis tools from Facebook and therefore we and Facebook are joint controller for processing your personal data, when you visit our Facebook page and/or when we make marketing campaigns through Facebook. You can read more about the agreement about us being joint data controller here and their Privacy Policy here which describes how Facebook process your personal data. Sharing data with Facebook through pixels and conversions API • If you give your consent, then we also use our own cookies, cookies from third parts and pixels (Pixels from Facebook, LinkedIn, Google and Adform) to remember your settings (necessary), measurement of visitors (statistics), to show targeted ads to you (marketing)	We process the following categories of personal data about you: **Ordinary personal data** • Name and username • Gender, age, and birthday • Personal data and other data which can be read from your Facebook profile. • Geographic limitation • Possibly your address, e-mail address and phone number • All communication that you have with us through our Facebook page/profile, e.g., your questions to our post at our page or in a comment to one of our posts. • IP-address • Data regarding your click behavior, buys, subscribing for	We collect your personal data from the following sources: • Directly from you • Public sources, e.g., social media	We process your personal data on the following legal basis: • Article 6.1.a. (consent) • Article 6.1.f. necessary for the pursuit of legitimate purposes of us in marketing and communication on social media.	We share your personal data with: • Suppliers and business partners in connection with service suppliers and technical support. • Facebook • Group companies.	We will retain personal data as long as necessary for the purposes stated: • Facebook retain data, as described in their Privacy Policy. • Customer inquiries in the "direct message" function and to some extent also as comments on "posts" are deleted within 6 months of the request being finally answered, unless these are in the nature of inquiries which can lead to actual complaints, legal proceedings and the like. Other comments on posts which do not have the character of actual "customer service inquiries" are retained as long as the post remains on social media. • Cookies: The expiration date of our cookies is described in our cookie policy.

and to follow your use of the website (functional and marketing). If you give your consent, then we also use Facebook conversions API, and we therefor share your data regarding click behavior, buys, subscribing for our newsletter, contact information and so with Facebook with the purpose to show you our offers, products, and campaigns that we think you will find interesting/ will interest you.	newsletter and contact information.				

4.2 SHARED MOBILITY A/S AND LINKEDIN ARE IN SOME CASES JOINT CONTROLLER FOR PROCESSING YOUR PERSONAL DATA ON LINKEDIN

The entities responsible for the processing of your personal information are:

Shared Mobility A/S
CVR-nr. 26045215
Park Allé 355
2605 Brøndby
gdpr@ehiglobal.dk
+45 70 70 12 00

LinkedIn Ireland Unlimited Company
Att: Data Protection
Wiltton Plaza
Wilton Plaxe, Dublin 2, Ireland

Purpose	Categories of personal data	Source of the personal data	Legal basis for the processing	Recipients	Data retention
Social media and cookies					
Social media Your personal data are collected when you visit our pages at social media, including when you communicate with us through comments and directs messages on social media e.g., our LinkedIn pages/profiles. We use LinkedIn for marketing, and we use user statistics and analysis tools from LinkedIn ("insight") plus uploading and promoting opening positions. Therefore, we and LinkedIn are joint controller for processing your personal data when you visit our page at LinkedIn and/or when we make marketing campaigns through LinkedIn. You can read more about the agreement about joint data controller here and their Privacy Policy here which	We process the following categories of personal data about you: **Ordinary personal data** • Name and username • Gender, age, and birthday • Personal data and other data which can be read from your Facebook profile • Geographic limitation • Possibly your address, e-mail address and phone number • All communication that you have with	We collect your personal data from the following sources: • Directly from you • Public sources, e.g., social media	We process your personal data on the following legal basis: • Article 6.1.f. necessary for the pursuit of legitimate purposes of us in marketing and communication on social media.	We share your personal data with: • Suppliers and business partners in connection with service suppliers and technical support. • Group companies.	We will retain personal data as long as necessary for the purposes stated: • Linkedin retain data, as described in their Privacy Policy. • The retention period for the personal data we receive with your use of our LinkedIn page including communication with us is described further under customer inquiries, as stated in this Privacy Policy. • Data received by job applications and job postings are processed

describes how LinkedIn process your personal data.	us through our Facebook page/profile, e.g., questions you ask to our post at our page or in a comment to one of our posts.				and retained according to the processing activity "Recruitments".

5. TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA

We use Microsoft 365, and transfer to third countries may occur. You may find the list of Microsoft's data processors on Microsoft's website here, here and here.

We use Google including Google Analytics, and transfer to third countries may occur. You may find a list of the locations Google process personal data here https://www.google.com/about/datacenters/inside/locations/index.html.

In addition, we use an US based booking system (TSD).

Personal information is shared within the Franchise organization (Enterprise Holdings) by transfer of personal data to the UK (Enterprise Rent-A-Car UK Limited) by use of an US based booking system (TSD) a transfer to the US. You may find more information about Enterprise Holdings processing of personal data here.

Such transfers will take place on the basis of the following legal basis:

a) The UK has been deemed by the Commission of the European Union to have an adequate level of protection of personal data.

b) The US has/have not been deemed by the Commission of the European Union to have an adequate level of protection of personal data. We will provide appropriate safeguards for the transfer: Through the use of "Standard Contractual Clauses for data transfers between EU and non-EU countries", as published by the Commission of the European Union. You may obtain a copy of the contract/agreement by contacting us at gdpr@ehiglobal.dk.

6. TARGETED MARTEING (PROFILING)

We may use profiling to be able to offer you certain offers and products that meet your preference for marketing purposes.

7. MANDATORY INFORMATION

The information about marked with *] is mandatory. The consequence of not providing the information is not being able to rent a car or not being able to rent a car on terms requiring a credit assessment.

8. YOUR RIGHTS

You have the following rights:

- You have the right to request access to, rectification or erasure of your personal data.
- You also have the right to have the processing of your personal data restricted.
- If processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent.
- You have the right to receive your personal information in a structured, commonly used and machine-readable format (data portability).
- You may always lodge a complaint with a data protection supervisory authority, e.g. The Danish Data Protection Agency.
- Furthermore, you have the right to object to processing of your personal data as follows.
- If processing of your personal data is based on article 6(1)(e) or article 6(1)(f), see above regarding legal basis, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data.
- **Where your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data about you for such marketing**.

You can take steps to exercise your rights via the website https://gdpr.semler.dk or by e-mail at persondata@semler.dk, and you can withdraw your consent by contacting us at gdpr@ehiglobal.dk.

There may be conditions or limitations on these rights. It is therefore not certain for example you have the right of data portability in the specific case - this depends on the specific circumstances of the processing activity.

9. AMENDMENT TO THIS PRIVACY POLICY

We may change or update this Privacy Policy if we find it necessary. The newest version of the Privacy Policy will always be available on our website or at https://gdpr.semler.dk

Last updated: 02.05.2023