

# **Privacy Policy Video Surveillance**

In the following we would like to inform you about the types of data processed by SIXT and about the purposes of such data processing. We would also like to inform you about important legal aspects of data protection, such as your rights. You are not contractually or legally obliged to provide us with your personal data. Please note, however, that you cannot enter into a vehicle rental contract with us if we are not permitted to process your data for the following purposes.

This Privacy Policy applies to the processing of personal data in our German SIXT branches and SIXT buildings in connection with video surveillance. Please note that for other data processing activities (e.g. in our App or for our rental business) separate privacy policies with different responsibilities may apply. Your attention will be drawn to such separate notices at the time this data is obtained.

### **A: Controller, contact information for data protection officer**

The party responsible for processing your data (controller) is the entity (hereinafter also referred to as SIXT) mentioned at the information signs (e.g. sign with camera pictogram on the outside of the building).

If you have any questions regarding data protection, please address your query to the following email address: [dataprotection@sixt.com](mailto:dataprotection@sixt.com).

You can also contact our data protection officer by writing to the above-stated address (reference: Data Protection Officer).

### **B: Kategorien personenbezogener Daten**

The following categories of personal data may be processed by us:

- Video recordings of persons within the detection range of cameras (e.g. customers, employees, third parties)
- License plates

### **C: The legal basis for data processing**

Art. 6 (1) sentence 1 point b) GDPR: Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract (e.g. when making the vehicle reservation).

Art. 6 (1) sentence 1 point f) GDPR: Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for the purposes of the legitimate interests pursued by the controller, i.e., SIXT, or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, i.e., you yourself.

### **D: The purposes of data processing**

#### **1. Video Surveillance**

Purposes of data processing

We carry out video surveillance at the SIXT rental branches or SIXT buildings for the following purposes:

- Exercise of domiciliary rights
- Prevention and investigation of criminal offenses
- Preservation of evidence
- Protection of life, limb and property

Legal basis for the above processing

Art. 6 (1) sentence 1 point f) GDPR

Our legitimate interest is the exercise of domiciliary rights, the protection of life, health or freedom, especially of our employees, the protection of our property, especially our vehicles and the preservation of evidence and prevention and investigation of criminal offenses.

Storage period or criteria for determining the storage period

Video recordings are erased (overwritten) after a standard period of 72 hours. If a longer storage period is required, e.g. if it is necessary to extend the period to preserve evidence or to investigate a specific criminal offence, this data will be erased immediately as soon as it is no longer needed for such purposes. For selected locations where cameras are used to prevent misappropriation, the storage period can be up to 20 days.

Recipients or categories of recipients of your data

We transmit the video recordings to the competent investigating authorities if this is necessary for the investigation of criminal offences or for the preservation of evidence. In addition, the service providers who maintain the technical equipment for video surveillance in the SIXT rental branches may have access to video data during maintenance work carried out by them.

## 2. License Plate Recognition

We carry out license plate registration at certain SIXT branches for the following purposes:

- enable SIXT vehicles to easily enter and exit SIXT branches
- correct invoicing by capturing the exact pick-up and drop-off times
- increase efficiency, legal certainty and customer satisfaction

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR

Art. 6 (1) sentence 1 point f) GDPR

Our legitimate interest in processing your personal data in the scope of license plate recognition is to enable drivers of SIXT vehicles to easily enter and exit SIXT branches, to increase our efficiency, legal certainty and customer satisfaction and to enable correct invoicing and thus the fulfillment of our contractual obligations.

Storage period or criteria for determining the storage period

In general, the data are deleted as soon as the purpose for which they were collected ceases to apply or legal retention obligations with which we must comply have expired. In case of the collection of license plates that do not belong to SIXT vehicles, we have technical and organizational measures in place to ensure that the processing of these license plates takes place with the least possible intensity and with a storage period which is reduced to the bare minimum. For example, the data are deleted again shortly after they recorded or the data are not even entirely recorded.

Recipients or categories of recipients of your data

Service providers who maintain the license plate recognition systems at SIXT branches may have the opportunity to access the data collected by the license plate recognition systems as part of processing on behalf of SIXT.

## E: Rights of the data subject

You can assert the rights mentioned below. Your requests to assert data protection rights and our responses to them will be stored for documentation purposes for a period of three years and, in individual cases, for the assertion, exercise or defense of legal claims even longer.

Legal basis for the above processing

Art. 6 (1) sentence 1 point f) GDPR

Our legitimate interest is to protect ourselves against claims or fines under Art. 82, 83 GDPR and to fulfill our accountability obligations under Art. 5 GDPR.

### 1. Right of access by the data subject, Art. 15 GDPR

You have the right to, at reasonable intervals, obtain information about your personal data under storage. The information you are entitled to includes information about whether SIXT has stored personal data concerning you, about the categories of personal data concerned, and about the purposes of the processing. Upon request, SIXT will provide you with a copy of the personal data that are processed.

### 2. Right to rectification, Art. 16 GDPR

You also have the right to obtain from SIXT the rectification of inaccurate personal data concerning you or to have incomplete data completed.

### 3. Right to erasure, Art. 17 GDPR

You furthermore have the right to obtain from SIXT the erasure of personal data concerning you. We are under obligation to erase personal data in certain circumstances, including if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, if you withdraw the consent on which the processing is based, or if the personal data have been processed unlawfully.

### 4. Right to restriction of processing, Art. 18 GDPR

Under certain circumstances, you have the right to have the processing of your personal data restricted. These include circumstances in which

you contest the accuracy of your personal data and we then have to verify such accuracy. In such cases, we must refrain from further processing your personal data, with the exception of storage, until the matter has been clarified.

### 5. Right to object, Art. 21 GDPR

If the processing of your data by SIXT is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Art. 6 (1) sentence 1 point e) GDPR) or is based on the legitimate interests of SIXT (Art. 6 (1) sentence 1 point f) GDPR), then you have the right to object at any time, on grounds relating to your particular situation, to the processing of your data. This also applies to any profiling based on this provision as defined by Art. 4 no. 4 GDPR, which we use for what are referred to as connected vehicle functionalities, for improving our processes and offerings or for advertising purposes. We will then end the processing, unless we can present compelling legitimate grounds for such processing that supersede the grounds for ending the processing.

You may exercise your right to object without the need to adhere to a particular format and direct it to the entity mentioned at the information signs or to the e-mail address: [dataprotection@sixt.com](mailto:dataprotection@sixt.com)

### 6. Contact information to exercise the rights of data subjects

If you wish to exercise your rights as a data subject, please direct such requests to the e-mail address: [dataprotection@sixt.com](mailto:dataprotection@sixt.com)

### 7. Right to lodge a complaint, Art. 77 GDPR

You have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR). You can exercise this right before a supervisory authority in the Member State in which you are resident, where your place of work is or the place where the suspected infringement is committed.

#### General information

We reserve the right to amend and adapt this Privacy Policy with effect for the future.

Current version: November 2023