

This policy was last updated on July 22, 2022.

At ENAERENTACAR S.A. operating the Enterprise, National and Alamo brands, we respect your privacy. We have implemented this privacy policy (“Privacy Policy”) to explain our data collection and use practices. You can learn more in the sections below.

WHAT INFORMATION WE COLLECT

Information Collected About You

You may provide us with certain information in connection with a transaction or in your interactions with our websites and at our locations. We collect the following types of personal information from you:

- Your name, contact information, date of birth, driver's license number and expiration date and emergency contact information;
- Vehicle rental information, including the location of where the vehicle is rented, date of rental, type of rental and your preferences;
- Your credit card details, online user account details, membership/corporate ID numbers, passport information and frequent flyer or travel partner affiliations

As a franchisee of Enterprise Holdings, Inc. and/or any of its relevant subsidiaries (“Enterprise”), Enterprise may share with us your reservation and booking information. For these transactions, we and Enterprise are independent data controllers. We also share information about you with Enterprise, as described below in the section titled “Who We Share Information With”.

Third parties provide us with additional information about you, including:

- Referral sources, such as third party online booking sites (who provide us general contact information and a booking confirmation number to facilitate the rental), your employer (general contact information), and your insurance provider (general contact and policy information).
- Where applicable, our Refer-A-Friend programmes.
- Hotel, airline and membership clubs, who provide us your general contact information and booking information.
- Credit reporting agencies, who, for fraud prevention purposes, provide us with identity-related information.
- Service Providers, such as customer support (customer service-related information and enquiries made by you) and marketing providers (information to assist us to better communicate our products and services).

With your consent, we will access location-based information or collect location markers from your mobile device or based on your IP address. We will use this information to provide you with notifications related to our locations, return information, local offers or other information that we think will be helpful in providing you with better services. We do not use this information to specifically locate you for any reason other than to provide you the service. With your consent, our application will utilize your device's camera. If you have allowed us to utilize your location information or your device's camera in the past and wish to revoke the permissions, please change the settings on your device.

Vehicle Operation and Location Data

Your vehicle may be equipped with emergency notification functionalities. In the event that a vehicle has been reported as potentially or actually lost or stolen, we may request access to the necessary Telematics Systems data from the relevant OEM. Contact details of the OEMs along with their applicable privacy disclosure which may include system and service limitations, warranty exclusions, limitations of liability, descriptions of use, disclosure and retention of information, and your individual rights may be found on the OEM's websites or may be available via the vehicle dashboard.

When you use any satellite navigation or infotainment system in this vehicle, you are responsible for any information that is stored in the systems as a result of your use. We cannot guarantee the privacy or confidentiality of such information, and you must wipe it before you return the vehicle to us. If you do not do this, the next users of the vehicle will be able to access this information.

HOW WE USE INFORMATION ABOUT YOU

We use the information we collect from you or about you to provide you with our services and for the following purposes:

- **Where it is necessary for us to enter into a contract with you and provide services to you for the duration of the contract, including**
 - To assist the transactions that you request, such as reserving, renting, purchasing or leasing motor vehicles.
 - To provide customer service related to your interactions with us or to respond to your enquiry.
 - To enrol you in our loyalty programmes and send non-promotional information relating to your ongoing membership of these programmes.

- **Where necessary for us to comply with a legal obligation, including**
 - To share information about your vehicle's location with emergency services in the event that you are involved in a road accident.
 - To share information with government and regulatory authorities when required by law or in response to legal process, obligation, or request.

- **Where it is necessary for our legitimate interests, as listed below, and where our interests are not overridden by your data protection rights, including**
 - To communicate important information about your rental, such as arrival and return alerts.
 - 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.
 - To compile statistics and analysis about our customers' use of our websites, products and services.
 - 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.
 - To protect our legal rights and manage the security of our networks and property. For example, we will use CCTV to ensure the security of our premises and we maintain Do Not Rent lists of customers that are non-payment or safety risks.
 - To share your information with third parties in order to prevent fraud and protect our business interests and rights, privacy, safety and property, or that of the public. We will

- do this to collect unpaid bills, to avoid liability for penalties you incur (e.g. traffic citations) and for claims processing purposes.
- To share your information with third parties in order 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. To share your information with third parties in order to prevent fraud and protect our business interests and rights, privacy, safety and property or that of the public. We will do this to collect unpaid bills, to avoid liability for penalties you incur (e.g. fixed penalty notices for driving offences) and for claims processing purposes. To share your information with third parties in order 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. We will also disclose your information to third parties if the rights of another individual may be violated.
 - To enable us to use telematics.
- **Where you have given consent, including**
 - To send you certain promotional or targeted marketing communications, opportunities and services that may be of interest to you.
 - To send you text messages in order to provide you with time sensitive communications related to your transaction (e.g., construction delay at airport branch), extended rental opportunities, customer experience surveys, marketing promotions such as coupons, discounts, last-minute specials or loyalty and rewards information.

Retention of Your Personal Information

We retain your personal information for as long as we need to fulfil our business purposes, as set out below:

Marketing purposes: We keep data linked to cookies and other online identifiers for up to three years. We keep other marketing information, such as email subscription and loyalty enrolment data for up to 7 years after your last interaction with us.

Rental transactions: We keep the data associated with your rental agreement for up to 7 years from the date of the rental, subject to other local legal requirements. We keep records of payments you have made for 2 years from the date of the transaction (depending on the location of the rental).

Customer service related queries: We keep general queries for 3 years, unless you make a complaint, in which case, we keep complaints data for 7 years.

Disputes & law enforcement: If we are involved in litigation or a governmental or regulatory investigation, then we keep data throughout the period of litigation or investigation and for 5 years after that. If a settlement means that we have to keep data for longer, then we keep data for the period required to administer the settlement. If we provide data to law enforcement agencies, then we keep a record of this for one year beyond the end of the investigation.

WHO WE SHARE INFORMATION WITH

Affiliates

We share the information we collect about you with our affiliates (“Affiliates”) for the purpose of providing the transactions you have requested and (with your consent) for marketing purposes.

Enterprise

We share your personal information with Enterprise for the following purposes:

- To manage your rental and for Enterprise to communicate with you about or assist with your rental.
- In relation to any incident arising from your dealings or an additional authorized driver's dealings with Enterprise if Enterprise thinks that, as a result of such incident, you or an additional authorized driver could be a risk for future rentals.
- In order for Enterprise and its third-party service provider to carry out phone customer satisfaction surveys.
- To send you marketing communications about similar products or services which Enterprise thinks may be of interest to you, including targeted advertising on Enterprise sites, selected partner sites and social networks.
- To compile statistics and analysis about you – and any applicable additional authorized drivers’ – use of Enterprise’s products and services, including statistics based on anonymized data, which enable Enterprise to provide you and other customers in the future with better customer service, products, features and functionalities.

When sharing such information with Enterprise, we and Enterprise operate as independent data controllers. Enterprise maintains its own privacy policy in respect of the information we provide Enterprise. You are encouraged to review Enterprise’s privacy policy, which can be found here: <https://privacy.ehi.com>

Our Service Providers and Business Partners

We will share your information with third parties, such as (1) payment, administrative and technical support providers, (2) our insurance, corporate rental or other customers or partners to facilitate the rental transaction, (3) communication providers which send email and other marketing and service-related communications to you on our behalf, (4) customer support providers in order to provide you customer service, (5) debt collection providers, (6) claims processors, and (7) our advertising and marketing partners and third-party media properties, including social media sites, with whom we share aggregated or de-identified information about our customers, to allow them to send targeted advertising messages on our behalf, to analyze, enhance and manage our data, conduct mobile analytics services and to maintain and improve our services (subject to confidentiality agreements as appropriate).

Government Authorities

Your personal information may also be shared with government authorities as outlined above.

Sale, Merger or Change in Control

Your information may also be transferred to another company in the event of a transfer, change of ownership, reorganisation or assignment of all or part of Enterprise Holdings' businesses or assets. This

will occur if the parties have entered into an agreement under which the collection, use and disclosure of the information is limited to those purposes of the business transaction, including a determination whether or not to proceed with the business transaction. You will be notified by email or prominent notice on our websites for thirty (30) days of any such change in ownership or control of your personal information or as otherwise may be required or permitted by law.

GLOBAL DATA TRANSFERS AND PROCESSING

The information you provide us or that we collect may be transferred or accessed by entities around the world, including:

- *Enterprise*: If you book a reservation with us or with an Enterprise corporate-owned location, we will transfer your personal information to Enterprise. Enterprise Holdings, Inc. is based in the United States and has corporate-owned locations in the United States, Canada, Germany, Spain, France, Ireland and the United Kingdom.
- *Third Party Service Providers*: We utilise third party service providers who are located outside the countries where we have corporate-owned locations, such as call centre support, claims processors and IT providers.
- *Enterprise Global Information Systems Based in the United States*: Enterprise maintains its global information systems in the United States. If you provide us with or if we collect personal information about you outside of the United States, we will transfer and maintain your personal information in the United States.

YOUR RIGHTS

Your rights may include the right to: 1) ask us for a copy of your personal information, 2) request that we correct your personal information, 3) request that we erase certain categories or types of information, 4) request that we restrict certain processing, 5) obtain the information you provide in a structured, machine readable format and 6) to transfer some of this information to other organizations. You have the right to object to processing of personal information on the basis of our legitimate interests. Where we have asked for your consent to process information, you have the right to withdraw this consent at any time.

You can exercise these rights by contacting us directly using the link at the bottom of this page. We will respond to your request within 30 days or as required by local law.

We reserve the right not to allow access to your information or to limit your rights (e.g. if such disclosure is prohibited by law or if the rights of another individual might be violated). In some instances, this may mean that we are able to retain your personal information even if you withdraw your consent.

MARKETING PREFERENCES

You have the right to object to direct marketing as well as profiling we perform for the purposes of direct marketing. You will be able to opt out of direct marketing communications by following the instructions

in each communication you receive. You may also contact us directly using the link at the bottom of this page.

You can opt out of display ads you see on non-Enterprise sites by clicking on ad choices icon in the ad or through the privacy settings on the site.

CHANGES TO THESE POLICIES

As necessary, we will update this Privacy Policy to reflect changes in our privacy practices. If we make any material changes, we will notify you by email (sent to the email address specified in your account) or by means of a notice on this site or as otherwise may be required or permitted by law, prior to the change becoming effective. We encourage you to periodically review this site for the latest information on our privacy practices.

DATA CONTROLLER CONTACT INFORMATION

If you are making a rental or visiting a website or mobile site in the following countries, the Data Controller will be listed as below.

Country	Data Controller	Contact Information
ECUADOR	ENAERENTACAR S.A.	STREET ADDRESS: Av Orellana E2-02 TELEPHONE (593 2)397-2800 EMAIL. carlos.teran@ehiglobal.ec