

## Privacy Policy

With this personal data processing/protection policy (hereinafter referred to as the "Policy"), information is provided regarding the collection, storage, processing, and use of your personal data.

The company under the name ".....A. KATSANTONIS E.P.E....." (hereinafter referred to as the "Company" or "we" or "us"), located at .....Athens..... Attica, 160 .....Liosion..... Street, phone .....+302114442306....., email address .....info@wantacar.gr....., acting as the Data Controller, collects, stores, uses, and generally processes your personal data.

### 1. What is Personal Data?

The term "personal data" refers to information about individuals, such as name, postal address, email address, contact phone number, etc., which identify or can identify your identity, hereinafter referred to as "Personal Data" or "Data."

### 2. What is the Processing of Personal Data?

Any operation or series of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction.

### 3. What Data do we collect?

We ensure that we collect only the Data that is absolutely necessary for the purpose for which it was provided and used exclusively for the purposes for which it was collected. In the context of our activities, we will use your contact information to keep you informed about matters related to the rental as well as new offers and services. Except for any Data collected from Cookies (see more in our Company's Cookie Policy), the Data is limited to what you have explicitly provided for a specific purpose and only with your consent. We also collect Data during your visit to our website, provided you have consented to this, which is implied by filling in the corresponding fields.

**Identity Data**, such as first name, last name, father's name, date of birth, driver's license, VAT number, ID card number.

**Contact/Shipping Data**, such as postal address, email address, phone number.

**Payment Data**, such as credit/debit card number, PayPal, bank account number.

**Identification Data**, such as username, IP address.

**Rental Contract History Data** with our Company.

**Overdue Payment Data** owed to our Company.

**Vehicle Accident Data** involving our Company's vehicles.

**Misconduct Data** towards our Company's staff.

**Geolocation Data (GPS)**, data from electronic applications (Bluetooth, navigator), Telematics application data.

#### 4. **How do we use your Data?**

Your Data is processed either by the specially authorized personnel of our Company or through IT systems and electronic devices by our Company. Generally, your Data is processed to provide you with the following indicative services:

**Submission of Offers:** The Company processes your Data to submit an offer for the short-term or long-term rental of a car.

**Car Rentals:** The Company processes your Data to fulfill its contractual relationship with you, which is the rental of cars, to provide service (such as maintenance, bodywork, repair, vehicle replacement, etc.), to comply with legal obligations, and to refute, raise, or exercise legal claims.

**Compliance with Applicable Laws:** The Company processes your Data to meet its legal obligations, particularly concerning compliance with Tax and Insurance laws or vehicle insurance coverage arising from an active insurance contract.

**Sending Newsletters:** The Company gives you the option to choose to receive information at your email address regarding promotional/advertising actions of the Company (e.g., for new products/services it offers, any offers, the operation of new car rental stations, travel agencies, etc.).

**Information Services on the Website:** The Company provides information services for its customers.

**Data in Electronic Applications (navigator, Bluetooth, GPS, etc.):** When using the vehicle, you or your passenger may store data in electronic applications that may be pre-installed in it. Our company will never ask you to store such data. If you do so, it will be entirely your choice, and it is your responsibility to delete the data from the vehicle's applications upon temporary or final delivery of the vehicle.

**Geolocation Data (GPS):** Our fleet vehicles may have geolocation systems (GPS) installed. These systems are activated only in cases of vehicle theft, following notification from the renter/driver. The legal basis for processing is the legitimate interest in protecting the Company's property.

**Telematics Application Data:** Our fleet vehicles have the option to install the Telematics application. These systems are activated for vehicle tracking in cases of theft, misappropriation, or unjustified failure to return the vehicle to the lessor on the agreed date, coupled with unsuccessful communication attempts with the lessee following relevant notification. The data provided by the application include:

**Smart Check-In**, evaluating the kilometers traveled during the rental, fuel level, etc.

**Timely Maintenance Alerts**, etc.

**Asset Management** in cases of significant vehicle damage, etc.

**Asset Inventory**, pinpointing the exact location of vehicles (owned by the lessor) at any time and informing the lessor's reference points.

The legal basis for processing is the legitimate interest in protecting the Company's property.

**Response to Your Data-Related Requests:** To fulfill any of your rights (access, deletion, correction, etc.), we will request at least identification and contact data and your signature. The purpose of processing is to handle your request, and the legal basis is the Company's compliance with its legal obligation.

**Customer Loyalty Programs:** Through these programs, the Company offers various benefits to its customers, such as priority service at rental stations, more advantageous parking positions at Company facilities, discount coupons, offers, etc.

**Communication:** The Company uses your Data to respond to requests/inquiries submitted via contact forms.

**Participation in Online Promotional Activities/Competitions:** The Company processes Data you provide for participating in a competition, if you agree, to conduct competitions, notify you if you are a winner, and deliver your prize.

## 5. Purpose of Processing Your Data

We collect your Data for the purposes of the products and/or services provided, including but not limited to:

- a) **Evaluating Your Request** for both the submission of an offer and the conclusion of the rental agreement.
- b) **Managing the Car Rental** you selected, e.g., communication and informing you about availability, contract execution, providing maintenance, bodywork, repair, replacement, vehicle collection services, sending necessary documents for purchased products or services provided, managing your debts to the Company, and issuing refunds.
- c) **Complying with Legal Obligations** imposed by applicable laws, such as labor, tax, and insurance legislation.
- d) **Monitoring, Improving, and Customizing** to your preferences and choices regarding our products and/or services.
- e) **Sending Information via Email** about the Company's products or services.
- f) **Conducting Customer Satisfaction Surveys**, promoting our products and/or services, and sending newsletters about our products and/or services.
- g) **Communicating in Case of Competitions.**
- h) **Assessing Risks**, including credit or other risks for the vehicles and claims on credit from the Company arising from contracts with customers, aiming to protect our vehicle property, sanitize transactions, prevent further damage, and generally protect commercial interests.

By detailing the comprehensive handling and processing of data, these policies aim to ensure transparency and protection of personal information, building trust and legal compliance in the Company's operations.

## 6. What is the Legal Basis for Processing Your Data by the Company?

The processing of your Data is conducted in accordance with:

- a) **The terms of our contractual relationship.**

- b) **Your consent**, where required.
- c) **The Company's legal obligations**, such as those arising from tax, labor, and insurance legislation.
- d) **The legitimate interest of our Company.**

## 7. Who are the Recipients of Your Data?

The Company guarantees that it will not transfer, disclose, or grant your Data to third parties (except those mentioned herein) for any purpose or use unless it is required by applicable law or requested by public/judicial authorities.

Access to your Data is granted to the absolutely necessary personnel of the Company, who are committed to maintaining confidentiality, and to our partner businesses that process your Data as Joint Controllers or Processors on our behalf and according to our instructions.

Indicatively, the recipients of your Data are: i) **Insurance companies** partnered with our Company.

ii) **Travel agencies** involved in car rentals.

iii) **Airlines** we collaborate with to secure more benefits for you in car rentals.

iv) **Partner companies providing vehicle repair, bodywork, and maintenance services** for cars rented to our customers.

v) **Certified public accounting firms** auditing our Company's financial statements.

vi) **Partner companies providing roadside assistance services** for drivers using our Company's vehicles.

vii) **Banks and electronic payment companies.**

viii) **Lawyers or law firms** to defend the interests of the Company.

ix) **Security service providers.**

## 8. How Do We Ensure that Processors and Sub-Processors Respect Your Data?

Processors acting on our behalf have contractually agreed and are bound by the Company to:

a) Maintain confidentiality,

b) Not send your Data to third parties without the Company's permission,

c) Implement appropriate security measures,

d) Comply with the legal framework for personal data protection, especially Regulation 679/2016/EU (otherwise GDPR).

Processors may employ other individuals (Sub-Processors) in the execution of their duties. In such cases, the Processor must be authorized to handle the whole or part of the Data processing. Consequently, the Sub-Processor has the same obligations and rights as the Processor, as outlined in this Policy, and within the scope of the assigned responsibilities, bearing joint responsibility with the Processor.

## 9. Do We Send Your Data Outside the EU?

The Company does not transfer your personal data outside the EU.

## **10. When Do We Delete Your Data?**

We retain your Data only for as long as necessary to fulfill the purpose for which you have provided your data and in compliance with applicable legislative provisions. All data held within the framework of the contractual relationship are retained for a maximum of twenty (20) years from the end of the rental relationship.

Your consent statement for receiving newsletters is retained for as long as newsletters are sent by the Company unless you choose to discontinue their receipt.

Personal data provided for participation in customer privilege programs are deleted when the program expires, a reason for exclusion arises, or you express your desire to stop participating in the program, as described in the program's terms of use.

Data processed during your participation in contests or market surveys are retained for the duration required to complete the contest or survey and are then deleted.

Data processed to create a list of customers not allowed to rent a vehicle due to previous unreliable actions or behaviors are stored for five (5) years from the end of the rental contract.

Our policy on the data collected by Cookies is described in our Cookie Policy.

## **11. Is Your Data Secure?**

The Company is committed to safeguarding your Data. Recognizing the importance of the security of your Personal Data, we have taken all appropriate organizational and technical measures, which are continuously improved based on technological advancements, solely for the purpose of ensuring the security and protection of your Data from all forms of accidental or unlawful processing.

## **12. What Are Your Rights?**

You have the right to access your personal Data. This means you have the right to be informed by us if we are processing your Data. If we are processing your Data, you can request information about the purpose of the processing, the type of Data we hold, who we share it with, how long we store it, whether automated decision-making is used, and other rights you have, such as correction, deletion of Data, restriction of processing, and filing a complaint with the Data Protection Authority.

You have the right to correct inaccurate personal Data. If you find an error in your Data, you can submit a request to us to correct it (e.g., correction of your name or update of address).

You have the right to deletion/right to be forgotten. You can ask us to delete your Data if it is no longer necessary for the aforementioned processing purposes or if you wish to withdraw your consent in cases where this is the only legal basis.

You have the right to Data portability. You can request to receive your Data in a readable format or ask us to transfer it to another processor.

You have the right to restrict processing. You can request us to restrict the processing of your Data while your objections to processing are being examined. You have the right to object and withdraw consent to the processing of your Data. You can object to the processing of your Data, and we will stop processing your Data unless there are compelling and legitimate grounds that override your right. If you have given your consent for the collection, processing, and use of your personal data, you can withdraw your consent at any time with future effect.

**14. How can you exercise your rights?**

To exercise your rights, you can submit a relevant request to us by sending it to the email address .....info@wantacar.gr....., along with the completed Request Form, and we will ensure to examine it and respond to you within one month from the receipt.

**15. When do we respond to your Requests?**

We respond to your Requests free of charge without delay, and in any case within (1) one month from the date we receive your request. However, if your Request is complex or there is a large number of Requests from you, we will inform you within the month if we need to extend the response time by another (2) two months, within which we will respond to you. If your Requests are clearly unfounded or excessive, especially due to their repetitive nature, the Company may impose the payment of a reasonable fee, taking into account the administrative costs for providing the information or executing the requested action, or may refuse to further proceed with the Request.

**16. Where can you inquire about the progress of your Requests?**

For information regarding the progress of your Request, you can address us at the email address .....info@wantacar.gr.....

**17. Do we use automated decision-making/ including profiling during the processing of your Data?**

We do not make decisions, nor do we engage in automated profiling, based on automated processing during the processing of your Data, except for the use of "cookies" on our website (see more in the Company's Cookies Policy).

**18. What is the applicable law for processing your Data by us?**

The applicable law is Greek Law, as formulated in accordance with the General Data Protection Regulation 2016/679/EU, and in general, the current national and European legislative and regulatory framework for the protection of personal data. The competent courts for any emerging disputes related to your Data are the competent Courts of Athens.

**19. Where can you appeal if we violate the applicable law for the protection of your Personal Data?**

You have the right to lodge a complaint with the Hellenic Data Protection Authority (postal address: Kifisias 1-3, Postal Code 115 23, Athens, telephone: 210. 6475600, email address: [contact@dpa.gr](mailto:contact@dpa.gr)), if you believe that the processing of your Personal Data violates the current national and regulatory legal framework for the protection of personal data.

**20. How will you be informed about any changes to this Policy?**

We update this Policy whenever necessary. If there are significant changes to the Policy or to the way we use your Personal Data, we will publish the update on our website and notify you by any appropriate means. We encourage you to regularly read this Policy to understand how your Data is protected. The Personal Data Protection Policy was drafted on 17.../...04/2024.

## **Company's Cookie Policy**

We use cookies on our website to store information on your computer or mobile device to enhance your internet experience. Cookies are small text files that allow you to navigate efficiently between pages, help us assess whether our website is working efficiently, and generally improve your browsing experience. Cookies can also help ensure that the advertisements you see online are more relevant to your interests. Additionally, cookies can be used to compile anonymous, aggregate statistics that allow

us to understand how the public uses our website and help us improve its structure and content. We cannot identify you personally from this information. You can modify your browser settings to reject some or all cookies, except for those that are strictly necessary. You should be aware that some features are only available through the use of cookies, and if you choose to reject cookies, these features may not be available.

## **What are cookies?**

Cookies are small pieces of text files stored in the User's browser when visiting a website. The information stored on the User's computer may include details such as which pages the User visited, the date and time of the visit, and a random and unique identification number of the User. Through this use, the website can store useful information about the User's navigation on it, as well as read this information to provide the User with a unified browsing experience.

There are two different types of cookies: Session and Persistent. They are used for different purposes and contain different information.

Session cookies contain information used during your current browsing session. These cookies are automatically deleted when you close your browser. Nothing remains on your computer after you leave the site.

Persistent cookies are used to store information used between visits. This data allows websites to recognize that you are a returning customer and react accordingly. Persistent cookies have a lifespan defined by the website, which can range from a few minutes to several years.

## **What cookies do we use on our website?**

The cookies we use are known as "persistent cookies."

Persistent cookies are stored as files on your computer and remain there when you close your browser, unless you delete them. We do not use cookies to extract information about your visits to other websites, or to verify personal information other than what you have voluntarily provided to us. Cookies do not harm your computer, nor the programs or files on your computer. In any case, cookies facilitate better service and user experience when visiting our Company's website, and we recommend that you have them enabled.

Even if you choose not to allow their use, you can still enjoy the full functionality of our website. However, you will need to re-enter some information on each visit. If you allow cookies and use a shared computer, please sign off at the end of your visit.

## **Absolutely necessary cookies**



Absolutely necessary cookies are essential for the proper functioning of the website, allowing you to browse and use its features, such as access to secure areas. These cookies do not recognize your individual identity. Without these cookies, we cannot provide efficient operation of our website.

### **Performance Cookies**

These cookies collect information about how visitors use the website, such as which pages are visited most frequently and whether they receive error messages from web pages. These cookies collect aggregate, anonymous information that does not identify any visitor. They are used solely to improve the performance of a website.

### **Third-party Cookies**

These cookies are placed by our partners on our behalf. These cookies collect data about the performance of our advertisements and your interaction with our website. This data may be used by our partners to draw statistical conclusions and improve your advertising experience as a visitor.

### **Functionality Cookies**

These cookies allow the website to remember user choices such as username, language, or region, to provide enhanced and personalized features. They can also be used to provide services requested by the user, such as viewing videos or using social media. The information collected by these cookies may be anonymous and cannot track browsing activity on other websites. If you do not accept these cookies, the performance and functionality of the website may be affected, and your access to content may be restricted.

### **Analysis Cookies**

These cookies collect information about your browsing behavior on our website, such as which pages of our website are subject to frequent visits and whether you receive error messages. Through this, we are able to make the structure, navigation, and content of the website as user-friendly as possible for you. We do not link statistical and other reporting data to individual natural persons. We use these cookies for:

- Recording the number of visitors to our web pages
- Recording the duration of each visit to our web pages
- Identifying the sequence/order in which you visit the various pages on our website
- Evaluating the points of the website that need improvement
- Optimizing the website

We may use software such as Google Analytics to analyze page usage, page interactions, and paths followed through our websites. These are known as 'website metrics' or 'analytics.' Google Analytics is a web analytics service provided by Google Inc. (Google). Google Analytics uses cookies to analyze users' use of the website. Google uses aggregated statistical data to provide the Company with an overview of how users use the website. Also, Web analytics cookies, from our partners Google and Adobe, allow us to monitor customer interactions within our website. These provide us with valuable information that enables us to improve the website, products, and services we offer. Google may provide such information to third parties only if required by law.

**Targeting/Advertising Cookies** These cookies are used on our website to provide content that is more relevant to you and your interests. They may be used for targeted advertising/offers, limiting ad views, or measuring the effectiveness of an advertising campaign. These cookies may be used to remember the websites you have visited so that we can determine which electronic marketing channels are most effective and allow us to reward external websites and partners that referred you to us.

### **Traffic Management**

The traffic management programs on our website are used to identify technical issues that may arise during your navigation on the website. Based on the information we gather through these programs, we correct technical errors and problems and continuously improve the services offered through the website to meet the user's personal needs.

### **Social Media Cookies**

These cookies are necessary to link your account to social media networks with our website. For example, to allow you to repost and share information from our website with your friends on social networks or to indicate that you want to follow our page on social media. Social media cookies are not required for your navigation on our website.

### **How to Control Cookies?**

It is at your discretion to revoke, whenever you wish, your consent or object to the use of cookies by our website on your computer or device, as well as to control and/or delete cookies. You can change your personal settings by appropriately configuring the browser you are using, either allowing the acceptance of specific types of cookies or refusing their use. You can delete cookies from the computer or device you are using at any time by following the path to delete them from the memory of the browser you are using. You can also configure the browser you are using in such a way that it either warns you about the use of cookies in specific services of the websites you browse or does not allow the acceptance of cookie usage under any circumstances.

Where can you find more information about the protection of personal data collected by cookies?

You will find information about the protection of your personal data, as well as your rights, in the Privacy Policy. Where can you find more information about the general use of cookies?

More information about the general use of cookies, as well as methods of blocking or limiting them, can be found on the websites <http://cookiepedia.co.uk/all-about-cookies> and <http://www.allaboutcookies.org/>.

Changes to the Cookie Policy:

This Cookie Policy may be amended at any time. For this reason, we find it advisable to regularly refer to this Policy. This was put into effect on ...17./04.../2024..... In case of modification, the date it occurred will be indicated. The Cookie Policy, as shaped by the most recent modification, is always considered valid."