



## PRIVACY POLICY

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### **1. Who processes your personal data collected through this website?**

Executive Trust Limited trading as, Europcar Ireland, CarHire.ie, IrishCarRental and Keddy; whose registered office is located at 35 Northwood Court, Northwood Business Park, Santry, Dublin 9, Ireland is the "Data Controller" of your "Personal Data" collected and processed via this website, our mobile applications, or our rental agencies in order to offer you mobility solutions.

The terms "Europcar", "we", "us" or "our" that we use in this policy refer to Executive Trust Limited. Executive Trust Limited is a member of the Europcar Mobility Group and the term "our Group" refers to Europcar Mobility Group.

When you communicate Personal Data to us or when we collect Personal Data about you, we undertake to use it in accordance with this Privacy Policy.

### **2. What Personal Data do we collect about you?**

As a provider of mobility solutions, we collect and process various categories of Personal Data. We do this in connection with our websites, our mobile applications, and in order to provide you with our products and services.

By Personal Data, we mean not only data that identifies you directly, but also data that identifies you indirectly.

The categories of Personal Data that we collect in the context of our services and the use of our websites and mobile applications include the following:

- Your identification data: surname, first name, email address, birth date, telephone number, postal address, account identifier;
- If applicable, identification data of additional driver(s): surname, first name, email address, telephone number, postal address;
- Your driver's licence and that of any additional driver(s);
- Payment data: account numbers, card numbers, etc.;
- Financial data: your prepayments, your invoices;
- As the case may be, data relating to traffic violations or other fines and penalties;
- Information about your flight in the event that the pickup location of your vehicle is an airport;
- Information on your vehicle reservation, in particular for the management of any loyalty programs;
- Data relating to your navigation on our websites or our mobile applications;
- Data relating to your satisfaction surveys or from your interactions on our dedicated social media pages;
- Voice, audio-visual and electronic data: recordings of your communications by e-mail, chat or telephone with our customer service department;
- Telematics information collected through our Connected Vehicle: vehicle status, damage or accident information, vehicle performance data, operational and diagnostic data, mileage information, acceleration and braking speeds, fuel consumption and fuel levels, tire pressure, odometer readings, vehicle inventory, vehicle location, cross-border movements and other vehicle information.

*For any information regarding the data processing of our Connected Vehicles, please consult our dedicated Privacy Policy for Connected Vehicles Ireland: <https://www.europcar.ie/en-ie/p/legal-information/connected-cars-privacy-policy>*

- Data related to cookies on our websites and other similar technologies.

*For information on the use of cookies, please consult our Cookie*

*Policy: <https://www.europcar.ie/en-ie/p/legal-information/cookie-policy>*

We collect most of your personal data directly from you, but we may receive data from third parties, including the competent authorities in charge of managing fines for traffic violations or private third parties regarding parking charges.

### **3. For what purposes do we process your Personal Data?**

We collect and process your Personal Data for various purposes and on the following legal bases:

Purposes of the processing	Legal basis of the processing
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<p>The creation and management of your customer account</p>	<p>This processing activity is necessary for the creation of your customer account and based on your contractual acceptance of our terms and conditions of hire, as well as any specific terms of use of our website or mobile applications.</p>
<p>Some repetitive data inputting and analysis tasks are conducted using Robotic Process Automation, which automatically processes data and in some instances utilises a learning algorithm, which is a simple form of Artificial Intelligence.</p>	<p>This processing is conducted on the basis of our legitimate interest to improve efficiency and accuracy of data input and analysis, which enables commercial efficiencies and improved customer experience and/or journey.</p>
<p>The management of your reservation and rental contract, in particular for :</p> <ul style="list-style-type: none"> <li>- confirming, modifying or cancelling your reservation ;</li> <li>- to communicate with you regarding your reservation and rental (for example, to provide you with information about your reservation and rental, to send you reminder notifications before you return your vehicle, to answer your questions or suggestions);</li> <li>- manage your rental;</li> <li>- manage your payment and invoices;</li> <li>- manage the collection of amounts due (including subsequent costs such as fines for traffic violations, or compensation for damage to the vehicle);</li> <li>- managing claims;</li> <li>- purchase and manage insurance for your Vehicle;</li> <li>- The management of commercial documents (customer invoices, purchase orders, certain electronically concluded contracts)</li> </ul>	<p>These processing activities are necessary for the execution of the rental services contract that you enter into with us.</p> <p>You can choose to register your credit card for your future bookings.</p>
<p>The checking of your driver's license</p> <p>This validation can be carried out either: (i) manually by our customer service department at the station; or (ii) automatically using a facial recognition device, which may utilise Artificial Intelligence.</p>	<p>(i) This processing is necessary for the performance of the rental services contract that you enter into with us.</p> <p>(ii) The use of the facial recognition solution is based on your consent to this alternative processing, which may improve customer journey.</p>
<p>Fight against fraud and other criminal activity – obtaining and reviewing additional</p>	<p>This processing is based on our legitimate interest in protecting ourselves and our assets against</p>

identification documentation.	credit card and other types of fraud or criminal activity.
Conducting satisfaction surveys to improve your experience with our products / services	This processing is based on our legitimate interest to have a better knowledge of its customers' needs and to improve its services and customer service.
Chatting in real time on our websites. These website chats take the form of live chats with our agents, as well as utilising 'Chabot's' to answer FAQs.	This processing is based on our legitimate interest in answering users' questions about our products and services, and improving the customer journey.
<p>Conducting business development and marketing activities in relation to all our brands, including :</p> <ul style="list-style-type: none"> <li>i- sending emails and SMS notifications about special offers and promotions;</li> <li>ii- recording your rental history to suggest our products and services to you when you search for new bookings or to send you special offers and benefits;</li> <li>iii- managing your loyalty program and membership card;</li> <li>iv- organizing contests and prize draws;</li> <li>v - sending emails about a booking we have not completed or about the status of your booking requests;</li> <li>vi - the management and updating of the prospect database.</li> </ul>	<p>Our commercial and marketing activities, i.e. the sending of commercial messages to promote our products and services across all brands are subject to your express consent.</p> <p>In the event that you are already our customer, you may receive commercial messages for products and services similar to those we have already provided to you. The sending of these messages will be based on our legitimate interest in communicating about our products and services.</p> <p>Processing activities included in category (v) are based on our legitimate interest to simplify and speed up the reservation process for our customers.</p> <p>Processing activities included in category (vi) are based on our legitimate interest to manage our prospect database.</p>
<p>The management of fines for traffic offences, tolls and parking charges, in particular for:</p> <ul style="list-style-type: none"> <li>- the transfer of information to the Garda Síochána, police or other enforcement agencies or issuing authorities</li> <li>- transfer to the Transport Infrastructure Ireland or its nominated servants or agents in respect of tolls</li> <li>- transfer to Council Authorities or private parking companies in respect of parking violations,</li> </ul> <p>to enable them to identify the driver (or potential driver) of our vehicle.</p>	This processing activity is based on our legal obligations, in particular our obligation under legislation such as the Road Traffic Act 1961 (as amended) and other similar legislation.

<p>The management and maintenance of a 'do not rent' list of customers with certain contractual risks, with regard to :</p> <ul style="list-style-type: none"> <li>- payment incidents resulting in legal proceedings;</li> <li>- traffic accidents or repeated damage; or</li> <li>- the use of our vehicles in violation of the general rental conditions; or</li> <li>- abusive behaviour towards our employees</li> </ul>	<p>This processing activity is based on our legitimate interest, in particular in asserting our rights, to prevent damage and fraud related to our assets, and us and to prevent and manage abusive behaviour towards our employees. We further have a legal obligation to protect our employees from abusive and offensive behaviour, as well as harassment.</p> <p>You may challenge this decision by contacting our customer services team.</p>
<p>Video surveillance on our premises</p>	<p>This processing activity is based on our legitimate interest in ensuring the safety of property and persons in our stations, by a deterrent effect or in such a way as to be able to identify the perpetrators of damage, theft or aggression.</p>
<p>Analysis of navigation data on our website and mobile applications</p>	<p>This processing is based on our legitimate interest in improving our products and services.</p>
<p>Connected Vehicle Telematics</p>	<p>For any information regarding the data processing of our Connected Vehicles including the legal basis, please consult our dedicated Privacy Policy for Connected Vehicles Ireland: <a href="#">here</a>.</p>

#### **4. Who are the recipients of your Personal Data?**

##### **4.1 Categories of recipients**

If necessary, your personal data may be communicated:

- a. to our employees, our authorized representatives, other companies of our Group and our franchise network, our agents and intermediaries mandated to provide you with our products and services;
- b. to our subcontractors, in particular our IT service providers for hosting, maintenance or development purposes, who assist us in providing you with our products and services, or collection agencies which help us recover unpaid amounts due. These may be entities that are members of our Group or external service providers;
- c. to our insurance services companies or agents to purchase and manage insurance for your vehicle or for the investigation and handling of accidents and claims;
- d. advertising agencies, marketing agencies, social networking and digital agencies to help us carry out advertising, marketing and sales campaigns and to analyse the effectiveness of these campaigns;
- e. to law enforcement bodies (and their foreign counterparts in the case of offences committed abroad) and other public and private sector bodies for the purposes of dealing with alleged or actual

road traffic or driving offences and/or associated fines; and private parking companies dealing with alleged or actual breaches of contract;

f. for the management and updating of the list of persons presenting certain contractual risks, to the vehicle rental industry generally and its staff with a view to its pooling among the member companies. The register is managed by our trade association the "Car Rental Council of Ireland". For more details visit <https://www.carrentalcouncil.ie>.

g. to our partners or those of our Group, in particular to enable you to collect loyalty points when you are a member of their program and therefore agreed to their privacy policy.

We may also disclose your personal data in accordance with applicable laws and regulations to the relevant competent authorities.

### **Use of Facebook**

All Facebook features and services available on our website or applications are governed by the Facebook Privacy Policy, which you can read for more information about your rights and settings options.

By using one of our website/applications, you can:

- Use Facebook social plug-ins, such as "like" or "share" our content on the Facebook Platform;
- Accept cookies from our website or applications (also known as "Facebook Pixel"), which will help us understand your activities, including information about your device, how you use our services, the purchases you make, and the ads you view, whether or not you have a Facebook account or are logged in to Facebook.

When you use these Facebook features, we collect data that helps us to:

- Display ads that may be of interest to you on Facebook (or Instagram, Messenger or any other Facebook service);
- Measure and analyse the effectiveness of our website, applications and advertisements.

### **4.2 International transfers**

In order to provide you with our products and services, we may use service providers located outside the European Union (in particular in the United Kingdom). In the event that the vehicle is booked abroad, data transfers will be carried out in the country in question in order to provide you with our mobility solutions.

Depending on the assumptions, some recipients may be located in countries recognized by the European Commission as providing an adequate level of protection of personal data or in countries that have not been recognized by the European Commission as providing such a level of protection. In any case, we have implemented appropriate protection measures to protect your personal data in accordance with data protection regulations.

### **5. How long do we keep your Personal Data?**

Your personal data are kept for different periods of time, depending on the purposes of the processing concerned:

Purposes of the processing	Data retention periods
The creation and management of your customer account	For the duration of the commercial relationship and 5 years after the end of the commercial relationship.
<p>The processing of your reservation and rental contract, in particular for :</p> <ul style="list-style-type: none"> <li>- Confirming, modifying or cancelling your reservation;</li> <li>- Communicate with you regarding your reservation and rental (for example, to provide you with information about your reservation and rental, to send you reminder notifications before you return your vehicle, to answer your questions or suggestions);</li> <li>- manage your rental;</li> <li>- manage your payment and invoices;</li> <li>- manage the collection of sums due (including subsequent costs such as fines for traffic violations, or compensation for damage to the vehicle);</li> <li>- managing claims;</li> <li>- taking out and managing your vehicle insurance</li> <li>- The management of commercial documents (customer invoices, purchase orders, certain electronically concluded contracts)</li> </ul>	For 5 years after the end of the reservation
Monitoring of connected vehicles.	The identifiable customer data is kept for a period of 12 months. In the event of damage or offences against property, investigation of damage and accidents caused to the vehicle, personal data may be retained until the cases are resolved (including until the closure of any legal or judicial proceedings).
Verifying your identity and to carry out credit and fraud prevention checks prior to releasing a vehicle to you at the start of the rental and where subsequently required.	13 months from the effective payment
Verifying that you are not recorded on a Sanction List	For 5 years from the collection of your data

The improvement of our products and services according to your preferences by carrying out satisfaction surveys.	3 years from our last contact
Chatting in real time on our website.	3 years from our last commercial contact
<p>Conducting business development and marketing activities, including :</p> <p>Sending emails and SMS notifications about special offers and promotions;</p> <p>Recording your rental history to suggest products/services to you when searching for new bookings or to send you special offers and benefits;</p> <p>sending emails relating to a booking that we have not completed or reporting the status of your booking requests;</p> <p>managing your loyalty program and membership card;</p> <p>organizing contests and prize draws;</p> <p>the management and updating of the prospect database.</p>	<p>- if you are Executive Trust Limited customer, 3 years from the end of the business relationship/reservation.</p> <p>- If you are not an Executive Trust Limited customer, 3 years from the collection of your personal data OR from the last time you requested information from us.</p>
<p>The management of fines, in particular for :</p> <p>- the transfer of information to the Garda Siochana, police or other enforcement agencies or issuing authorities to enable them to identify the driver (or potential driver) of our vehicle in the event of a driving offence or suspected driving offence;</p>	For the time necessary to identify the driver responsible for committing the offence giving rise to the contravention, which should not exceed 45 days from receipt of the contravention. However, relevant information may be retained for a longer period of up to 12 months from receipt of the contravention.
<p>Management and updating of a list of clients with certain contractual risks ('do not rent' list), with regard to :</p> <p>- payment incidents resulting in legal proceedings;</p> <p>- traffic accidents or repeated damage</p> <p>- inappropriate or abusive conduct towards our employees or our customers;</p> <p>- the use of our vehicles in violation of the general rental conditions including the use of our vehicles for criminal or alleged criminal activity.</p>	Up to 5 years from the occurrence.
Video surveillance (CCTV) on our premises	Up to a month.
Analysis of navigation data on our website and mobile applications	Please see the Cookie Policy

## 6. What rights can you exercise regarding the processing of your Personal Data?



Within the limits and conditions allowed by the regulations in force, you can:

- **access** to your Personal Data and obtain further information on the characteristics of the processing we carry out;
- have your Personal Data **corrected, updated and deleted**, it being specified that deletion can only be carried out when (i) the data is no longer necessary in relation to the purposes for which it was processed, (ii) you withdraw your consent and there is no other legal basis for the processing, (iii) you object to the processing of your personal data and there is no compelling legitimate reason for the processing (iv) it has been established that your personal data has been processed unlawfully, (v) the personal data must be deleted in order to comply with one of our legal obligations
- you **object** to the processing of your Personal Data based on legitimate interest, which you can check by taking a look the table shown in the part “For what purposes do we process your Personal Data” and in particular the column “Legal basis of the processing”
- you **object** to the processing of your Personal Data for commercial prospecting purposes
- **receive** the personal data you have provided us with or request us to pass them on to a third party when the processing of your personal data (i) has been carried out by automated means and (ii) is based on your consent or on the execution of a contract binding us
- **request the limitation** of the processing of your Personal Data, which means that we will not be able to use your Personal Data for a defined period of time. You can exercise this right when:
  - a) you dispute the accuracy of your personal data for a period of time that allows us to verify the accuracy of your personal data;
  - b) the processing of personal data is unlawful and you object to the deletion of your personal data and instead demand that its use be restricted;
  - c) we no longer need your Personal Data but they are still required for the establishment, exercise or defence of legal claims;
  - d) you object to the processing for reasons relating to your particular situation, while we are checking whether the legitimate reasons pursued by Executive Trust Limited trading as Europcar Ireland take precedence over your own.
- **withdrawing your consent** to treatment based on your consent
- **submit a complaint** to a Supervisory Authority. In Ireland, the Supervisory Authority is the Data Protection Commission, 21 FITZWILLIAM SQUARE SOUTH, DUBLIN 2, D02 RD28, IRELAND or on the website: <http://www.dataprotection.ie>.

## 7. How do you exercise your rights?

If you would like to know more about the provisions of this privacy policy or to contact our Data Protection Officer, you can also write to us at the following address

Data Protection, Europcar Ireland, 35 Northwood Court, Northwood Business Park, Santry, Dublin 9, D09 F1P0, Ireland.

or by e-mail to: [dpo@europcar.com](mailto:dpo@europcar.com)

To exercise your rights, you must prove your identity by clearly indicating your surname, first names, driver ID and any useful information enabling us to identify you (such as the place and date of your last vehicle rental). You must also give us the e-mail address or the physical address to which you would like the reply to be sent to you.

## **8. How do we protect your Personal Data?**

Executive Trust Limited is committed to protecting the information it collects through its websites.

In particular, Executive Trust Limited uses appropriate physical, technical and organizational security measures to prevent unauthorized or unlawful processing, accidental loss of or destruction of, or damage to your personal data.

Executive Trust Limited's systems are configured with data encryption, or scrambling technologies, and industry-standard firewalls. When you send personal information to an Executive Trust Limited website over the Internet, your data is protected by "Transport Layer Security" (TLS) technology to ensure safe transmission.

Any credit card transaction you make through Executive Trust Limited websites or within our rental locations is done through our secure server technology. This technology notably:

- a) assures your browser that your data is being sent to the correct computer server, and that the server is secure;
- b) encodes the data, so that it cannot be read by anyone other than the secure server;
- c) checks the data being transferred to ensure it has not been altered.

## **9. What rules apply to the processing of your Personal Data when you click on links placed on our website, redirecting to our partners' or other sites?**

On this site you will find various links to the websites of our partners (e.g. for travel services). This Privacy Policy does not apply to the processing of your Personal Data by any partners or other third parties, which may occur when you visit their websites. We are not responsible for such data processing. If you would like information on how these partners and third parties process your personal data, please consult their privacy policies.

## **10. Changes to this Privacy Policy**

This Privacy Policy was last updated on 19/12/2025.