PRIVACY NOTICE ON PERSONAL DATA PROCESSING
Article 13-14 of GDPR 679/16 and Legislative Decree 101/2018 on Personal Data Processing
Full version

*Rev. 03/inf.sint del 29.05.25*

*The General Data Protection Regulation (GDPR) regarding the protection of natural persons with regard to the processing of personal data, as well as the free movement of such data, contains a set of rules aimed at ensuring that personal data is processed in compliance with the fundamental rights and freedoms of individuals. This notice incorporates these provisions.*

Protecting your privacy and personal data is a priority for us. With this privacy notice, we want to inform you about how we collect, process, and protect your personal data when you use our car rental services.

## 1. Who We Are

ITALY CAR RENT (hereinafter the "Data Controller") is a car rental company with its registered office at Via Provinciale, 77/A - 90044 Carini (PA). For any questions regarding this privacy notice or the processing of your data, you can contact us via email at: privacy@italycarrent.com or through our website www.italycarrent.com.

## 2. Data Protection Officer (DPO)

We have appointed a Data Protection Officer (DPO) to whom you can address any questions regarding the processing of your personal data or to exercise your rights. The DPO's contact details are:

- Name: Gabriele Amato
- Email: **g.adpoprivacy@gmail.com**

## 3. Types of Data Collected

We collect various types of personal data in order to provide you with our services efficiently and securely. The data we collect includes:

- **Identification data:** first name, last name, date of birth, residential address, phone number, email address, tax code.
- **Rental-related data:** driving license number, payment information (credit/debit card), rental history.
- **Browsing data:** IP addresses, information related to browsing our website (e.g., pages visited, duration of the visit, etc.), data from cookies or other similar technologies.
- **GPS-related data:** During the rental of the vehicle, we collect information related to the vehicle's location via the integrated GPS (Global Positioning System) system. This allows us to monitor the vehicle's position and route during use.

## 4. Purposes of Data Processing

Your personal data will be processed for the following purposes:

- **Execution of the rental contract:** To manage and complete the rental contract, from booking to vehicle return.
- **Compliance with legal obligations:** To fulfill obligations under fiscal, insurance, and road safety regulations.
- **Vehicle security and control management:** To monitor the vehicle's location via GPS to ensure the vehicle's security during the rental, prevent theft, and manage emergencies.
- **Service analysis and optimization:** To improve the quality of our service by collecting data on routes taken, vehicle usage, and to support the customer in case of issues or needs during the rental period.

## 5. Legal Bases for Data Processing

Your personal data is processed based on the following legal grounds, in accordance with EU Regulation 2016/679 (GDPR):

- **Performance of a contract** (Art. 6(1)(b) GDPR): Data processing is necessary for the execution of the rental contract, including booking confirmation, payment management, vehicle delivery and return, and vehicle safety management.
- **Compliance with legal obligations** (Art. 6(1)(c) GDPR): We process your data to comply with legal obligations to which we are subject, such as insurance management, tax obligations, and in case of accidents or violations of road regulations.
- **Legitimate interest** (Art. 6(1)(f) GDPR): The processing of GPS-related data is based on our legitimate interest in monitoring vehicle security and preventing theft. In particular, this processing aims to improve fleet management and the overall safety of our services.

## 6. Data Processing Methods

Data processing is carried out through both manual and automated methods, in compliance with current data protection laws (EU Regulation 2016/679 - GDPR). Your data will be processed with the utmost confidentiality and security.

## 7. Data Retention

Your personal data will be stored for the time necessary to achieve the purposes for which it was collected, in accordance with the law and our legal obligations.
The following guidelines apply specifically to data retention:

- **Rental Data:** Data related to the booking, rental contract, and vehicle return will be stored for a period of 5 years from the completion of the rental, in accordance with Italian tax and accounting regulations.

- **Payment Data:** Payment data (e.g., credit/debit card information) will be stored for a period of 10 years, as required by tax and accounting regulations.
- **GPS Data:** Data related to the vehicle's location (GPS) will be retained until the end of the rental period and then for a maximum of 30 days. After this period, GPS data will be anonymized or deleted, unless retention is necessary for security reasons or for potential legal disputes.
- **Safety Data:** Data required for safety purposes (e.g., accidents, theft, emergencies) will be stored for the time necessary to resolve the incident or emergency situation, and subsequently for a period not exceeding 5 years, in accordance with civil and criminal liability regulations.

## 8. Data Sharing

Your data may be shared with third parties, but only for purposes strictly necessary to provide the service, such as:

- **Payment institutions:** To manage payments and transactions.
- **Insurance companies:** To handle any accidents or damages during the rental.
- **Competent authorities:** To comply with legal or regulatory obligations.
- **Technology service providers:** To manage GPS monitoring systems and data collection regarding the vehicle's location.

Under no circumstances will your data be sold or transferred to third parties for unauthorized commercial purposes.

## 9. GPS Data Processing

The integrated GPS system in the vehicle collects information about the vehicle's geographic location during the rental period. This data is used for the following purposes:

- **Security monitoring:** To prevent vehicle theft or assist the customer in case of emergency.
- **Fleet management and service optimization:** To monitor vehicle usage and ensure compliance with current regulations and rental terms.
- **Internal analysis:** To improve the services offered, including optimizing routes and fleet management.

GPS data is stored for a limited time and is accessible only when necessary for security, customer service, or in the event of a violation of rental terms (e.g., using the vehicle outside of the authorized area).

## 10. Data Subject Rights

Under EU Regulation 2016/679 (GDPR), you have the right to:

- Access your personal data and receive information on how it is processed.
- Request correction or completion of your data.
- Request the deletion of your personal data (right to be forgotten), unless there are legitimate reasons to retain the data.

- Object to the processing of your data for direct marketing purposes.
- Request the restriction of processing in certain circumstances.
- Receive your data in a structured, commonly used, and machine-readable format (right to data portability).

To exercise your rights, you can send a written request or contact our DPO at g.adpoprivacy@gmail.com.

## 11. Data Transfers Abroad

Your data may be transferred abroad, including to countries outside the European Union, to countries that ensure an adequate level of protection for personal data, as established by applicable legislation.

## 12. Automated Processing

We wish to inform you that we do not carry out automated processing of your data, including profiling, which may have legal effects on you or significantly affect you.

## 13. Changes to this Privacy Notice

We reserve the right to modify this privacy notice at any time. Any changes will be posted on our website, and, if necessary, we will inform you directly.

## 14. Data Security

We implement appropriate technical and organizational measures to protect your personal data from unauthorized access, loss, or damage. However, we advise you that transmission of data over the internet is not completely secure, and we cannot guarantee absolute security during data transmission.

## 15. Contacts

For any questions regarding our privacy policy or to exercise your rights, you can contact us at the following address:

[ITALY CAR RENT]
Via Provinciale, 77/A - 90044 Carini (PA)
privacy@italycarrent.com
+39 0656557837