

# Privacy Policy

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## 1. who processes your personal data?

A. Klees Slovakia s. r. o., Ivánska cesta 91, Bratislava – mestská časť Ruzinov 82104, is the "data controller" for your personal data collected, stored and processed through this website or our rental stations and agencies in order to provide you with mobility solutions under the Buchbinder brand.

The terms "Buchbinder", "we", "us" or "our" used in this policy refer to A. Klees Slovakia s. r. o. which offers mobility solutions under the Buchbinder brand.

In accordance with the applicable regulations on the protection of personal data, A. Klees Slovakia s. r. o. is the "Responsible Entity".

A. Klees Slovakia s. r. o. is a company of the Europcar Mobility Group. The term "our group" refers to the Europcar Mobility Group.

If you provide us with personal data or if we collect personal data from you, we undertake to process it in accordance with this Privacy Policy.

## What personal data do we collect from you?

As a mobility solutions provider, we collect and process various categories of personal data from you when you use our website to provide you with our products and services.

By personal data we mean not only data that directly identifies you, but also data through which you can be indirectly identified.

The categories of personal data we collect in connection with our services and the use of our website are:

- Your identification data: Surname, first name, e-mail address, telephone number, postal address, driver ID, identity card and/or passport number, date and place of birth,
- If applicable, identification data of the additional driver(s): surname, first name, e-mail address, telephone number, postal address,
- Details of your driving licence and the driving licence of any other driver: number, date and place of issue, date of validity,
- Details of your identity card/passport: Number, date of issue, place of issue, date of validity,
- Payment data: Account numbers, card numbers, etc,
- Financial data: Your invoices,
- If applicable, data on administrative offences that concern you,
- Where applicable, data on vehicle damage as a result of accidents and other incidents,
- Information about your flight in case the pick-up location of your vehicle is an airport,
- Navigation data related to your use of our website,
- Electronic data: Recordings of your communication by e-mail with our Customer Service,
- All vehicles in our fleet have a user manual that contains instructions for resetting the information and communication systems to the factory settings.

Deleting the data you have stored in the communication systems is your responsibility,

- Data related to cookies and other similar technologies. For information on the use of cookies, please see our Cookie Policy at [Cookie Policy ie Slovakia](#)
- We collect most of your personal data directly from you, but we may also receive personal data from third parties, including the competent authorities responsible for handling fines for traffic violations.

### 3. for what purposes do we process your personal data?

We collect, store and process your personal data for various purposes on the basis of the following legal grounds:

Purpose of the processing	Legal basis of the processing
The creation and management of your customer account	Acceptance of the terms of use of our website.
The management of your reservation and rental contract, in particular for:  - the confirmation, modification or cancellation of your reservation,  - communicating with you regarding your reservation and rental (e.g. to send you information about your reservation and rental, to send you reminders before you return your vehicle, to answer your questions or make suggestions),  - Manage your rents,  - Manage your payments and invoices,  - manage the collection of amounts due (including consequential costs such as fines for traffic violations or compensation for vehicle damage),  - Receivables management,  - Conclusion and management of Insurance for your vehicle	Necessary for the execution of the tenancy agreement you enter into with us.  You have the option to register your credit card for your subsequent payments.

<p>Checking your driving licence and identity card.</p> <p>This check can be done manually by our ward staff.</p>	<p>Based on our legal obligations, in particular Act No. 8/2009 Z.z. on Road Traffic. This processing is necessary for the performance of the rental contract you conclude with us.</p>
<p>Combating credit card fraud.</p>	<p>Our legitimate interest in protecting ourselves against credit card fraud.</p>
<p>The administration of fines for traffic violations and criminal offences, in particular for:</p> <ul style="list-style-type: none"> <li>- the transmission of the personal data of the tenant named on the tenancy agreement to the administrative fine authorities and investigating authorities for the processing of administrative offences and criminal offences,</li> <li>- processing the collection of handling fees, towing charges and cost notices if a claim is made against us as the owner of the vehicles.</li> </ul>	<p>Are our legal obligations as a keeper, in particular Act No. 8/2009 Z.z. on Road Traffic.</p>
<p>Managing and updating a list of clients with certain contractual risks in relation to:</p> <ul style="list-style-type: none"> <li>- Payment transactions that have resulted in legal proceedings,</li> <li>- Traffic accidents or repeated damage or improper behaviour towards our employees,</li> <li>- Violations of the General Rental Terms and Conditions when using our vehicles,</li> </ul>	<p>Our legitimate interest, in particular our interest in enforcing our rights to prevent risk and fraud in relation to the performance of your tenancy and to prevent improper conduct towards our employees,</p> <p>We try to maintain a fair balance between the need to process your personal data and respect for your rights and freedoms, in particular privacy, when balancing interests. If you are on this list of at-risk customers, we will refuse your reservation request. You can object to this decision by sending an email to the following address: <a href="mailto:datenschutz@buchbinder-rent-a-car.at">datenschutz@buchbinder-rent-a-car.at</a>,</p>
<p>Video surveillance on one of our</p>	<p>Our legitimate interest in ensuring the</p>

premises,	security of our vehicles and other assets and people in our stations. This approach has a deterrent effect and helps identify those responsible for property damage, theft or robberies,
Analysis of navigation data on our website.	Our legitimate interest in improving our products and services.

## Who are the recipients of your personal data?

### 4.1 Categories of recipients

If necessary, your personal data may be passed on:

- a. to our employees, our authorised representatives, other companies and our group's franchise network, our agents and intermediaries who are appointed to provide our products and services to you.
- b. to our subcontractors, in particular our IT service providers for hosting, maintenance or development purposes, who assist us in providing our products and services to you or to debt collection companies who assist us in recovering unpaid car hire invoices. These may be companies that are members of our group or external service providers,
- c. to our service companies to take out and manage insurance for your vehicle,
- d. to fine authorities in Slovakia and abroad with the necessary information for processing fines for administrative offences.

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

- Measure and analyse the effectiveness of our website, digital apps and advertising.

### How long do we store your personal data?

Your personal data will be stored for different periods of time depending on the purpose of the processing:

Purpose of the processing	Retention periods
The creation and management of your customer account.	For the duration of the business relationship and 7 years after the end of the business relationship.
<p>The management of your reservation and rental contract, in particular for:</p> <ul style="list-style-type: none"> <li>- the confirmation, modification or cancellation of your reservation,</li> <li>- communicating with you regarding your reservation and rental (e.g. to send you information about your reservation and rental, to send you reminders before you return your vehicle, to answer your questions or to give you suggestions),</li> <li>- Manage your rents,</li> <li>- Manage your payments and invoices,</li> <li>- manage the collection of amounts due (including consequential costs such as fines for traffic violations or compensation for vehicle damage),</li> <li>- Receivables management,</li> <li>- Purchase and manage insurance for your vehicle.</li> </ul>	For 7 years after the end of the reservation.
Combating credit card fraud.	Credit card data is stored by our service provider. The storage period is 10 years.
<p>The administration of fines for traffic violations and criminal offences, in particular for:</p> <ul style="list-style-type: none"> <li>- the transmission of the personal data of the tenant named on the tenancy agreement to the administrative fine authorities and investigating authorities for the processing of administrative offences and criminal offences,</li> </ul>	<p>For the processing of administrative offences, in particular</p> <ul style="list-style-type: none"> <li>- the transmission of the tenant's personal data to the competent administrative fine authority or investigating authority if we are obliged to disclose your personal data (e.g. in the case of administrative offences)</li> <li>- processing the collection of handling fees, towing charges and cost notices if a claim is made against us as the owner</li> </ul>

	<p>of the vehicles.</p> <p>Requests for information from the fine authorities are stored for 10 years.</p>
<p>Managing and updating a list of clients with certain contractual risks in relation to:</p> <ul style="list-style-type: none"> <li>- Payment transactions that have resulted in legal proceedings,</li> <li>- Traffic accidents or repeated damage or improper behaviour towards our employees,</li> <li>- Violations of the General Rental Terms and Conditions when using our vehicles.</li> </ul>	<p>3 or 5 years from the date of creation or amendment of the last lease and depending on the nature of the contractual risk.</p>
<p>Video surveillance on one of our premises.</p>	<p>A few days up to a month depending on the collection volume.</p>
<p>Analysis of navigation data on our website.</p>	<p>The data will be stored for a period of 2 years.</p>

## 6. what rights can you exercise regarding the processing of your personal data?

On the basis of the applicable laws, you can assert the following rights:

- Request **information** about your personal data and further information about the processing carried out by us,
- have your personal data **corrected**, **updated** and **deleted**. We would like to point out that deletion can only take place if
  - (a) the data are no longer necessary in relation to the purposes for which they were processed,
  - (b) you withdraw your consent and there is no other legal basis for the processing,

(c) you object to the processing and there is no compelling legal ground for the processing,

(d) it is established that your personal data have been processed unlawfully,

(e) the personal data must be deleted in order to comply with our legal obligation.

- You can **object to** the processing of your personal data for personal reasons,
- You can **object to** the processing of your personal data for advertising purposes,
- You may **receive** the personal data you have provided to us from us or ask us to disclose the personal data to a third party if the processing of your personal data is (a) carried out electronically and (b) based on your consent or the performance of a contract binding us,
- You can request the **restriction of the processing of** your personal data. In this case, we cannot process your personal data for a certain period of time. You can exercise this right if:
  - a) you challenge 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 your personal data is unlawful and you object to the erasure of your personal data and request instead that its use be restricted,
  - c) your personal data is no longer required by us but is still necessary for the establishment, exercise or defence of legal claims,
  - d) you object to the processing on grounds relating to your particular situation while we consider whether our legitimate interest overrides your interest.
- You can **withdraw your consent** to the processing of your personal data,

- You can **lodge a complaint with a supervisory authority.**

The following supervisory authority is responsible:

**Úrad na ochranu osobných údajov Slovenskej republiky**

Hraničná 12, 820 07 Bratislava 27 Slovenská  
republika

+421 2 32 31 32 14

e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk)

## **7. how do you exercise your rights?**

If you would like to find out more about the provisions of this data protection declaration or contact our data protection officer, you can also write to the following address:

A. Klees Slovakia, s. r. o.  
Ivánska cesta 91,  
Bratislava – mestská časť Ruzinov 821 04

or by e-mail: [datenschutz@buchbinder-rent-a-car.at](mailto:datenschutz@buchbinder-rent-a-car.at)

To exercise your rights, you must prove your identity by providing your first name, last name, driver ID or customer number and any other information that allows us to identify you (e.g. location and date of your last vehicle rental). We also ask you to provide us with the email or an address to which we can reply.

## **How do we protect your personal data?**

A. Klees Slovakia, s. r. o. undertakes to protect the information it collects via the [Buchbinder.at](https://www.buchbinder.at) website.

In particular, A. Klees Slovakia, s. r. o., which provides the website, uses appropriate physical, technical and organisational security measures in order to prevent unauthorised or unlawful processing, accidental loss, destruction or damage to your personal data.

The systems of A. Klees Slovakia, s. r. o. are configured with industry-standard data encryption or scrambling technologies and firewalls.

If you send personal data via the website [www.aklees.sk](http://www.aklees.sk), your data is protected by "Transport Layer Security" (TLS) technology to ensure secure transmission.

Any credit card transaction you make through the [www.aklees.sk](http://www.aklees.sk) website is done through our secure server technology.

Especially this technology:

- a) ensures that your data is sent to the correct computer server and that the server is secure,
- b) encrypts the data so that it cannot be read by anyone other than the secure server;
- (c) checks the transmitted data to ensure that 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 that redirect to our partners' websites or other websites?**

On our website you will find various links to our partners' websites (e.g. for travel services). Please note that this privacy policy does not apply to the processing of your personal data by our partners or other third parties that may take place when you visit these websites. We are not responsible for such data processing. If you would like information about how our partners and third parties process your personal data, please read their privacy policies.

#### **10. changes to this privacy policy**

This privacy policy was last updated on 10.10.2022.