

SIXT PRIVACY POLICY
Sixt S.à.r.l.

Content

I	CONTROLLER & CONTACT DETAILS OF THE DATA PROTECTION OFFICER	4
II	CATEGORIES OF PERSONAL DATA	4
III	LEGAL BASES	5
IV	SIXT-rent & SIXT+ car subscription	5
	1 Vehicle Reservation	5
	2 Rental / Fulfillment of the Rental Agreement	6
	3 Credit Check and Data Transfer to Credit Agencies	6
	4 Sanctions List Screening & Background Checks	6
	5 Identity / Driver's License Check	7
	6 Call Recording & Transcription	7
	7 Mobile Check-In	8
	8 Digital Queue	8
	9 Vehicle Return	8
V	SIXT-charge	9
VI	SIXT-ride	9
VII	GENERAL	10
	PAYMENT, DAMAGES & OTHER	10
	1 Transactional Communication	10
	2 Payment	10
	3 Reimbursements	10
	4 Damages and Accidents	10
	5 Connected Vehicles / Telematics	11
	6 Prevention and Investigation of Legal and Regulatory Violations	11
	7 Process and Offer Optimization	12
	8 Business Customers, Partners, and Service Providers	13
	9 Cookies and similar Technologies	13
	CUSTOMER SERVICE	13
	MARKETING, CUSTOMER RETENTION AND COOPERATIONS	14
	1 Marketing & Direct Advertising	14
	2 Cooperations, Partnerships and Rewards Programs	15
	2.1 SIXT ONE Rewards Program	15
	2.2 Cooperation with Vehicle Manufacturers	15
	2.3 Other Cooperations & Partnerships	16
VIII	SIXT ACCOUNT & SIXT APP	16
	SIXT ACCOUNT	16
	1 Creation & Verification of a SIXT account	16
	2 Managing your SIXT account	17
	SIXT APP	18
	1 Verification in the SIXT App	18
	2 Managing the SIXT account via the SIXT App	18
	3 Using SIXT products in the SIXT App	18
IX	ARTIFICIAL INTELLIGENCE ("AI")	19
X	SOURCES OF YOUR DATA	19
XI	CATEGORIES OF RECIPIENTS OF YOUR DATA	19
XII	TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES	21

XIII	STORAGE PERIOD	21
XIV	AUTOMATED DECISION-MAKING	22
XV	DATA SUBJECT RIGHTS	22
1	Right of access by the data subject, Art. 15 GDPR	22
2	Right to rectification, Art. 16 GDPR	22
3	Right to erasure, Art. 17 GDPR	22
4	Right to restriction of processing, Art. 18 GDPR	22
5	Right to data portability, Art. 20 GDPR	22
6	Right to object, Art. 21 GDPR	23
7	Right to withdraw your consent, Art. 7 (3) GDPR	23
8	Contact information to exercise the rights of data subjects	23
9	Right to lodge a complaint, Art. 77 GDPR	23

In the following we would like to inform you about the processing of your personal data and your related rights.

This privacy policy applies to the processing of personal data by the SIXT company specified in the section “Controller & Contact Details of the Data Protection Officer,” in its SIXT branches, as well as on its websites and apps. Please note that for certain data processing operations (e.g., within the context of the SIXT app, the loyalty program “SIXT ONE,” or the use of SIXT-ride, for the processing of personal data in connection with video surveillance and similar technologies, or in cases where personal data is processed by other companies within the SIXT Group or by SIXT franchisees), separate privacy policies with different responsibilities may apply.

You will be explicitly informed about such deviating responsibilities. If separate privacy policies apply in this context, your attention will be drawn to such at the time this data is collected. You are not contractually or legally obliged to provide us with your personal data. Please note, however, that you may not be able to enter into a vehicle rental contract with us if we are not permitted to process your data for the purposes outlined below.

I CONTROLLER & CONTACT DETAILS OF THE DATA PROTECTION OFFICER

The controller, within the meaning of Regulation (EU) 2016/679 – General Data Protection Regulation (“GDPR”) – responsible for processing your data (“controller”), unless otherwise specified in this privacy policy at the respective points, is:

Sixt S.à.r.l.

Niveau Mezzanine N° 5-G09-1
1110 Findel
Luxembourg

(hereinafter also referred to as SIXT).

For any questions regarding data protection, you can contact us at any time at the following email address:

dataprotection@sixt.com

You can contact our data protection officer either via the above email address or at the address stated above (keyword: data protection officer).

II CATEGORIES OF PERSONAL DATA

Folgende Kategorien personenbezogener Daten können von uns im Zusammenhang mit unseren Dienstleistungen verarbeitet werden:

Master Data	Name, address, telephone number, email address, customer number, and profile number.
Reservation & Rental Data	Pick-up time, vehicle information, additional services booked, rental agreement, and other information about your reservations or rentals.
Financial Data	Payment method, cardholder, credit card number, expiration date, credit check results, and similar payment-related information.
Invoice Documents and Transaction Data	Invoice documents, transaction ID, amount.
Communication Data	Communication content such as emails, letters, faxes, chat logs, and transcripts.
Loyalty & Partner Program Data	Partner reference number, points, miles, and similar information.
Damage Data	Damage reports, damage assessments, police reports, details of the damage.
Traffic / Administrative Offense Data	Offense type, fine amount and other offense details.
Driver's License Data	Driver's license number, date of issue and expiration date, country, driver's license classes, validity check result, copy of driver's license.
Identity Card / Passport Data	Identity card/passport number, date of issue and expiration date, country, validity check result, documents copies in certain cases.

Analytics Data	Pages viewed, clicks, browser information, operating system, device language, and other data collected using cookies and similar technologies.
Log Data	Logs and Events.
Telematic Data	Sensor data, status information (e.g., ignition on/off), warning messages (e.g., engine warning light or maintenance information), mileage, charge/fuel level.
Location Data	Location of the vehicle or device using Global System for Mobile Communications (“GSM”), Global Positioning System (“GPS”) or Bluetooth.
Audio Material	Call recordings.
Photo/Video Material	Photo and video material.
Voluntary Data	Data that you voluntarily provide to us without being expressly requested to do so.
Data of Third Parties	Data from passengers, travel managers, parties involved in accidents and witnesses.
Special Categories of Personal Data	Health data in the event of an accident, vehicle damage, or similar incident, and biometric data as part of the digital verification process.

III LEGAL BASES

Depending on the type and purpose of the processing, the following legal bases of the GDPR may apply:

Art. 6 (1) sentence 1 point a) GDPR	Pursuant to this provision, the processing of your personal data is lawful if and to the extent that you have given your consent to such processing.
Art. 6 (1) sentence 1 point b) GDPR	Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract.
Art. 6 (1) sentence 1 point c) GDPR	Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for compliance with a legal obligation to which SIXT is subject.
Art. 6 (1) sentence 1 point f) GDPR	Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for the purposes of the legitimate interests pursued by the controller, i.e., SIXT, or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, i.e., you yourself.
Art. 9 (2) point a) GDPR	Pursuant to this provision, special categories of personal data may be processed if you have given your consent to the processing of special categories of personal data.
Art. 9 (2) point f) GDPR	Pursuant to this provision, certain special categories of personal data can be processed if such processing is necessary for the establishment, exercise or defence of legal claims.

IV SIXT-rent & SIXT+ car subscription

1 Vehicle Reservation

Purposes of data processing

If you wish to reserve / rent a vehicle at one of our SIXT branches without a prior reservation, we will create the reservation for you, advise you during the sales conversation, and handle the vehicle pickup. If you have already made your reservation in advance (e.g., via the SIXT app, a SIXT website, by phone, or through third parties), we will process your existing reservation at our SIXT branch, provide any necessary further advice, and manage the

vehicle pickup.

In selected SIXT branches, the processing of your reservation and the checkout process is carried out via video checkout counters. In these cases, the related conversation does not take place with an employee physically present, but with an employee connected remotely via video call.

In this context, we process your master data, reservation and rental data, as well as any voluntary data and data of third parties (e.g., additional drivers) that you share with us. For the video checkout, we furthermore process audio and video material to carry out the video call.

If your reservation was made through another SIXT company, a SIXT franchisee, a travel agency, an online travel agent, or other third party, we receive the relevant data from them (see → [SOURCES OF YOUR DATA](#)).

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

2 Rental / Fulfillment of the Rental Agreement

Purposes of data processing

For the purpose of concluding, executing, and settling the rental agreement, we process your master data, reservation and rental data, financial data, invoice documents and transaction data.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

3 Credit Check and Data Transfer to Credit Agencies

Purposes of data processing

To reduce the risk of payment defaults, credit checks may be carried out before entering into contracts and during ongoing contractual relationships with customers or business partners. For credit checks, we may transfer your master data to the following credit agencies in accordance with the applicable legal requirements:

- **Dun & Bradstreet Deutschland GmbH**
Robert-Bosch-Straße 11, 64293 Darmstadt, Germany
www.dnb.com/de-de/datenschutz
- **Creditreform München Ganzmüller, Groher & Kollegen KG**
Machtlfinger Straße 13, 81379 München, Germany
<https://www.creditreform.de/muenchen/datenschutz>

In addition, SIXT may transfer information on behaviour in breach of contract and information on payment defaults ("negative data") to credit agencies.

These credit agencies process your personal data as independent data controllers and may also use it for profiling (scoring) to provide their contractual partners with information, among other things, to assess the creditworthiness of individuals and legal entities. For more information on data processing by the credit agencies, please refer to the privacy policies of the respective agency listed above.

Here we process your master data.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest is to protect ourselves from payment defaults and other damages. SIXT furthermore has a legitimate interest in transferring negative data for the effective enforcement of claims due to us.

4 Sanctions List Screening & Background Checks

Purposes of data processing

In accordance with European law and foreign trade regulations, we may conduct checks against relevant

sanctions lists and perform risk-based background checks on companies, organizations, and individuals for the purpose of identifying, assessing, and mitigating compliance risks. This includes, in particular, reviewing publicly available sources and relevant databases.

Here we process your master data and publicly available information.

Legal basis for the above processing

Art. 6 (1) sentence 1 point c) and f) GDPR.

Our legitimate interest lies in complying with the legal requirements applicable to us under sanctions and foreign trade law, avoiding criminal or administrative fines, and protecting our company from reputational harm. If, in individual cases, there is an explicit legal obligation to process personal data for carrying out such checks, Art. 6 (1) sentence 1 point c) GDPR serves as the legal basis for processing your personal data.

5 Identity / Driver's License Check

Purposes of data processing

When picking up a vehicle at the counter of one of our branches, we check your identity and driver's license to ensure that vehicles are only rented to clearly identified customers with a valid driving license. This may involve a visual inspection of your ID document, comparison with your driver's license, and making a copy of your driver's license. At some locations, we also use camera systems or special card readers to check driver's license and ID documents, which additionally verify the security features of the documents.

In this context, we process your master data, reservation and rental data, driver's license, and ID/passport data for you and any additional drivers.

Legal basis for the above processing

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest is to ensure that vehicles are provided only to uniquely identified persons holding a valid driving license.

6 Call Recording & Transcription

Purposes of data processing

If you have given your explicit consent – for example, when you contact us via our online form or at the start of a call – we may record, transcribe, and analyze customer conversations with support of AI for service improvement, processes optimization, and quality assurance purposes.

This may occur during phone calls with our customer service as well as during conversations with sales representatives, whether via phone or online meeting tools (for example, when requesting product information or offers). Additionally, this may take place in selected SIXT branches during in-person conversations with our branch employees, as well as at our video checkout counters, where the conversation is held with an employee connected remotely via video call.

When recording conversations with branch employees present on site, real-time transcription is performed and the audio recording is deleted immediately afterwards. Personal data is pseudonymized for the recording of conversations with employees present on-site, and SIXT does not have access to any data that can be traced back to individual persons but only receives aggregated data or analyses. In all other cases, we delete call recordings after 90 days. You can also withdraw your consent at any time with effect for the future, as well as ask our employees to stop the recording.

Here we process your master data, communication data, audio material, and voluntary information you provide to us.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR.

7 Mobile Check-In

Purposes of data processing

"Mobile Check-In" is a digital service that allows you to complete the check-in process – including identity and driving license verification – online in advance via the **SIXT App** or mobile web, instead of at the counter. This saves you valuable time at pickup and allows you to make changes to your reservation, such as selecting a different vehicle category or protection package.

Identity and driving license verification in the Mobile Check-In process is performed – provided you have given your prior consent – through the online verification process of an external service provider. After the authenticity of your license is confirmed using various security features, a check of the document against your person is performed using a photo ("selfie") you create. This involves the use of biometric characteristics to ensure that it is actually you and to prevent misuse of forged or stolen documents.

In this context, we may process your master data, reservation and rental data, driver's license data as well as special categories of personal data (biometric data).

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR in connection with Art. 9 (2) point a) GDPR for the online verification process and the associated processing of biometric data.

Art. 6 (1) sentence 1 point f) GDPR for verifying your identity and driving license.

Our legitimate interest is to ensure that vehicles are provided only to uniquely identified persons holding a valid driving license.

8 Digital Queue

Purposes of data processing

With our digital queue, our "Greeters" welcome you at the entrance of selected SIXT branches, give you useful information (e.g., the possibility of skipping the line using **Mobile Check-In**), and notify our counter of your arrival. This shortens waiting times, improves business processes, and thus enhances service quality and increases customer satisfaction.

In this context, we process your master data, reservation and rental data, and time stamps for your arrival and the time you are served at the counter.

Legal basis for the above processing

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest is to improve service quality and increase customer satisfaction.

9 Vehicle Return

Purposes of data processing

When returning your vehicle at one of our SIXT branches, we process the return for you. This includes entering the return into our system and physically receiving the vehicle, during which, for example, battery/fuel level and mileage are documented and the vehicle is checked for potential damages. Data such as battery/fuel level and mileage may also be automatically collected via the vehicle or through telematics solutions installed.

We process your master data, reservation and rental data, and telematics data.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest is to make our return processes as simple and efficient as possible.

V SIXT-charge

SIXT-charge is a free charging service available via the SIXT App that allows you to charge your electric vehicles at over 550,000 charging points in 29 countries.

Notwithstanding the information provided under **CONTROLLER & CONTACT DETAILS OF THE DATA PROTECTION OFFICER**, the party responsible ("controller") for the provision of this product as an intermediary is:

Sixt GmbH & Co. Autovermietung KG

Zugspitzstraße 1
82049 Pullach
Germany

For any questions regarding data protection, you can contact the following email address at any time:

dataprotection@sixt.com

You can also contact the data protection officer either via the above email address or at the address stated above (keyword: data protection officer).

Purposes of data processing

SIXT-charge allows you to conveniently charge your vehicle using the SIXT App. With SIXT-charge, you can find a charging station near you, manage the entire charging and payment process, and keep an overview of your charging sessions. In this context, we process your master data, financial data, reservation and rental data.

To provide you with the Sixt-charge service, we use a charging solution from "Volkswagen Group Charging GmbH" (hereinafter "Elli"), which we offer to you as an intermediary in the SIXT App and which you can use conveniently with your SIXT account and the payment method stored there.

For the processing of personal data through "Elli," the privacy policy of "Elli" apply, which are made available to you in the SIXT App before starting the charging process.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

VI SIXT-ride

With SIXT-ride, you can use taxi, limousine, chauffeur, and transfer services. Notwithstanding the information provided under **CONTROLLER & CONTACT DETAILS OF THE DATA PROTECTION OFFICER**, the party responsible for the provision of this product ("controller") is:

Sixt Ride GmbH & Co. KG

Zugspitzstraße 1
82049 Pullach
Germany

For any questions regarding data protection, you can contact the following email address at any time:

dataprotection-chauffeur@sixt.com

You can also contact the data protection officer either via the above email address or at the address stated above (keyword: data protection officer).

For further information about data protection in connection with the use of SIXT-ride, please refer to the privacy policy available at: <https://www.sixt.fr/ride/legal/data-privacy-policy/>

VII GENERAL

PAYMENT, DAMAGES & OTHER

1 Transactional Communication

Purposes of data processing

In connection with the use of our products and services, we send you transactional communications, such as reservation confirmations and important information related to your rental agreement (e.g., details about where your vehicle is ready for pickup), via email, SMS, WhatsApp and push notification.

Here we process your master data and reservation and rental data.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

2 Payment

Purposes of data processing

Generally, you can choose to pay for your reservation immediately or upon vehicle pickup. If you decide to pay for your reservation in full in advance, the agreed rental price is charged immediately upon booking. If you have a reservation that is not prepaid, the payment is processed at the SIXT branch. This also applies if, at the branch, you decide to add further paid extras (e.g., protection packages, charging/refueling service, child seat) or upgrade to a higher vehicle category for your prepaid reservation.

If you decide to use **Mobile Check-In** or if you don't pick up the vehicle at the counter – for example, when picking up the vehicle outside of our business hours or in the case of vehicle deliveries – the payment and the blocking of the agreed deposit are processed digitally in advance.

In this context, we process your master data, financial data, reservation and rental data.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

3 Reimbursements

Purposes of data processing

As part of processing reimbursements, we process your personal data in order to reimburse legitimate expenses you have incurred in connection with rentals, such as costs for vehicle maintenance (e.g., engine oil or windshield washer fluid), transportation and recovery, as well as other expenses (e.g., attorney or court fees). Reimbursement requests can be submitted both via email and through web or app forms.

We may use external service providers to handle the reimbursement process in order to ensure efficient processing and payment.

In this context, we process your master data, financial data, reservation and rental data.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

4 Damages and Accidents

Purposes of data processing

In the event of accidents and damage to our vehicles, we process your personal data for the handling and processing of damages and accidents, providing customer service, and for the assertion, exercise, or defense of legal claims.

In order to effectively enforce our claims, we may process the renter's data as well as the data of additional drivers.

If necessary, we may contact the renter and additional drivers and, in certain cases, transfer the required data to debt collection service providers to enforce our claims.

In this context, we may process your master data, reservation and rental data, financial data, damage data, third-party data, telematics data, and possibly location data and special categories of personal data (health data).

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR for handling and processing damages and accidents and for the provision of customer service in this regard.

Art. 6 (1) sentence 1 point f) in connection with Art. 9 (2) point f) GDPR for the investigation of damages and accidents as well as the assertion, exercise, or defense of legal claims, including the processing of health data.

Our legitimate interest is the proper clarification of damages and accidents and the assertion, exercise, or defense of legal claims, and thus protecting our company from damage.

5 Connected Vehicles / Telematics

Purposes of data processing

Our vehicles may be equipped with telematics or "connected vehicle" functionalities, which allow us to receive telematics data from our vehicles and send commands to them. This data is collected by SIXT or the respective vehicle manufacturer and serves the following purposes:

- **Maintenance, care, and organization of our vehicle fleet**

We process telematics data for the maintenance, care, and organization of our fleet, especially to be informed in time about due service intervals or mileages that require a vehicle exchange.

- **Protection of our vehicle fleet**

Furthermore, we process telematics data (especially vehicle location data) to protect our fleet in case of justified suspicion of unlawful behavior in individual cases, e.g., to locate and recover vehicles after embezzlement or theft.

Additionally, we may process telematics data (e.g., sensor data) to identify and trace vehicle damage.

Regardless of this, vehicle manufacturers may also collect data independently and on their own responsibility through vehicles, without SIXT having any influence on this data transmission or receiving access to this data. In such cases, the privacy policy of the respective manufacturer applies.

It is not always possible for us to individually configure privacy settings of the vehicles we offer or to restrict or prevent such data transmission to manufacturers. Furthermore, please note that our vehicles are generally operated in fleet mode, which means that any privacy settings you make, such as activating a "Privacy Mode," generally do not prevent the collection of telematics data.

Further information regarding the processing of personal data by vehicle manufacturers and the applicable terms and conditions for vehicle and telematics data can be found on the manufacturers' websites.

Specific information regarding the EU Data Act is available at <https://www.sixt.be/pages/privacy-policy/>.

Legal basis for the above processing

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest is the efficient management of our fleet and the protection of our vehicles against embezzlement and theft and providing evidence for the assertion, exercise, or defense of legal claims (e.g., in case of damage).

6 Prevention and Investigation of Legal and Regulatory Violations

Purposes of data processing

As part of the prevention and investigation of contractual, legal, or moral misconduct, we take the measures described below to avert damage from our company.

- **Fraud prevention**

We calculate a risk score for each reservation based on statistical reservation characteristics (such as the time of reservation and pickup, the vehicle category booked, the number of past rentals, and other comparable features). For reservations with a high risk score, our branch staff are notified and instructed to be particularly attentive when identifying the customer and checking driver's licenses.

Additionally, we may take measures to prevent fraud as part of our online verification processes – for example, recognizing selfies that have been used multiple times in connection with fraud attempts in order to prevent verification in such cases.

In this context, we process your master data and reservation/rental data.

- **Vehicle location tracking**

Some of our vehicles transmit location data to us, which is analyzed in real time based on experience-based criteria to detect potential risks of embezzlement, such as leaving the contractually agreed area of use or entering defined risk zones.

Location data collected in this context is only stored, assigned to your person, and used for further investigation or to locate vehicles if there is a justified suspicion of contractual or legal violations (e.g., embezzlement) in individual cases. In all other cases, location data is immediately deleted and not further processed.

In this context, we may process master data, reservation/rental data, telematics data, and location data.

- **Data transfer to authorities**

In connection with administrative offenses, criminally relevant behavior, threats to public safety, or due to legal obligations, we may transfer the data listed under **CATEGORIES OF PERSONAL DATA** to (security) authorities to the extent necessary.

SIXT also reserves the right not to enter into rental agreements with persons who have attracted attention due to payment defaults, breaches of contract or law, or inappropriate behavior towards customers or employees. In this context, we may process your master data in order to exercise our right to freedom of contract.

Legal basis for the above processing

Art. 6 (1) sentence 1 point c) GDPR.

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest is to protect our property, avert damage from our company, and protect our contractual and non-contractual rights.

7 Process and Offer Optimization

Purposes of data processing

SIXT may process personal data in order to continually improve its app, website, internal processes, and offerings and adapt them to the needs of its customers. For this purpose, we may also analyze booking and usage data – for example, to better assess demand for specific vehicle models or locations, or to identify recurring issues based on customer service contacts. This is done particularly to improve our service processes, develop our product portfolio, and implement further improvement measures.

All analyses are carried out in anonymized or pseudonymized form as far as possible.

In this context, we may process the data listed under **CATEGORIES OF PERSONAL DATA** to the extent required.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR, if we carry out measures that require your prior consent.

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest is to continuously improve our company and the services we offer, develop our products further, and enhance customer satisfaction.

8 Business Customers, Partners, and Service Providers

Purposes of data processing

SIXT processes personal data of business customers, partners, and service providers (especially their contact persons) in the context of supplier and partner management, for establishing and conducting business relationships, and for communication and handling tenders, orders, and offers.

Here we may process master data, communication data, and financial data.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest is to establish, conduct, and maintain business relationships, efficiently manage procurement and contractual processes as well as to ensure smooth communication and tender processes.

9 Cookies and similar Technologies

Purposes of data processing

On our websites and apps we use cookies and similar technologies for performance, security and development purposes and for marketing purposes (e.g. by analyzing and evaluating usage behavior). This helps us for example to optimize and continuously improve our websites and apps as well as the user experience. These processes are carried out anonymously or with the use of pseudonyms, wherever possible. Cookies are small text files that are copied from a web server onto your device and assigned to the browser you are using, so that certain information can flow to the entity that sets the cookie. Cookies cannot execute any programs or infect your device with viruses.

When accessing our websites or apps for the first time, you will be informed in detail about the use of such technologies and have the option of rejecting the use of services that are not essential for the use of the website or app. If you change your mind at a later point in time, you can adjust your settings at any time with effect for the future by clicking "Cookie-Settings" in the footer. In the app, you will find this option under Account → Settings → Privacy Settings.

Further information on the cookies and similar technologies we use on our websites, their functions and lifespan as well as the data processed in this context can be found at <https://www.sixt.be/pages/privacy-policy/> and in the second layer of our cookie banner, which is automatically displayed when you access the website for the first time, and otherwise is accessible at any time by clicking "Cookie-Settings" in the website's footer.

For more information about the cookies and similar technologies used in our apps, please refer to the App Analytics Policy (accessible via Account → Legal → App Analytics Policy) and the second layer of our cookie banner, which is automatically displayed when you first visit the app and can also be accessed at any time via Account → Settings → Privacy Settings.

For more information on exercising your right of access under Art. 15 GDPR with regard to personal data processed in connection with the use of cookies and similar technologies, see the section [Right of access by the data subject, Art. 15 GDPR](#).

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR for optional cookies and similar technologies that are not strictly necessary for using the website or app.

Art. 6 (1) sentence 1 point f) GDPR for cookies and similar technologies that are strictly necessary for using the website or app.

Our legitimate interest is to ensure the essential functioning of our websites and apps, provide expressly requested digital services, and maintain stable and reliable operation of IT systems and related services, quickly identify and resolve technical issues, and protect IT systems from security incidents.

CUSTOMER SERVICE

If you have questions, requests, or complaints concerning our services, you can contact our customer service via

phone, email, WhatsApp, and mail.

Our customer service is also supported by AI-powered chatbots and voice bots to reduce waiting times and resolve your issues as quickly as possible. On our websites and in the SIXT app, we offer a messenger/chatbot with which you can start a conversation by clicking the SIXT Customer Service AI Chatbot widget.

If you contact us by phone, our SIXT Customer Service AI Voicebot may initially answer your call. For technical reasons, operation of the voicebot requires transcription of the conversation. We may use these transcripts from interactions with our chat and voice bots to improve the bots. You may object to the storage and analysis of these transcripts at any time by sending an email to: dataprotection@sixt.com

Before processing your request, our employees may first ask you to provide some personal details in order to verify your identity.

Furthermore, and regardless of where or how you made your reservation or picked up the vehicle, you can visit our SIXT branches to make changes to your rental – for example, if you are dissatisfied with your vehicle, there is a defect, you want to add an additional driver or have another concern.

Depending on your concern and communication channel, we may process your master data, communication data, reservation and rental data, financial data, invoice documents and transaction data, telematics data, location data, voluntary data, and any third-party data you provide as part of your inquiry.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR for the recording of telephone conversations with employees.

Art. 6 (1) sentence 1 point b) and f) GDPR for the handling of your request.

Our legitimate interest is to process your request quickly and efficiently.

Art. 6 (1) sentence 1 point f) GDPR for the analysis of transcripts for process optimization purposes.

Our legitimate interest is to improve the efficiency and user-friendliness of our customer service and thereby increase customer satisfaction, as well as to improve our chat and voicebot.

MARKETING, CUSTOMER RETENTION AND COOPERATIONS

1 Marketing & Direct Advertising

Purposes of data processing

We carry out measures for advertising, customer retention, optimization of customer offers, and for market and opinion research. This is done, for example, via newsletters, letters, and notifications regarding offers for rental cars, suitable extras, or additional services such as mileage packages, recommended protection packages, or other services connected to vehicle rental, taking into account your rental history.

In this context, we may process your master data, reservation and rental data.

If you have given your consent, we may also process your master data, reservation and rental data, and analytics data to analyze your preferences and usage behavior in our app, for customer segmentation including automated processing of personal data to evaluate personal characteristics and behavioral patterns ("profiling"), and for targeted communication via push notifications (e.g., reminders to complete incomplete bookings, suggestions to add protection packages, or helpful travel information such as directions to the airport branch).

Our marketing activities also include sweepstakes, which are subject to specific terms and conditions. If you participate in one of our sweepstakes, we process the data you provide for participation (generally by entering it in a participation form on our website or in a branch), to the extent necessary for the execution and handling of the sweepstake. Furthermore, we hold various events for customer care and retention purposes.

Your contact details, which we have received from you in connection with the sale of a product or service, are processed to send direct marketing for our own similar products or services via E-Mail, SMS and WhatsApp.

In our marketing as well as our transactional emails, we may use tracking links and tracking pixels, which are technically provided by our service providers. These technologies serve to ensure the delivery of our emails, to identify and resolve technical errors, and to evaluate interactions with our email communication in order to continuously improve it. The data collected in this process is generally evaluated in aggregated or statistically summarized form only.

You can object at any time to the processing of your data for direct marketing purposes (see → **Right to object, Art. 21 GDPR**). If you object, your contact details will be placed in our advertising blocking list to ensure your data is not processed for advertising purposes. If you do not wish to be included in our advertising blocking list, you may request that we delete your contact details (see → **Right to erasure, Art. 17 GDPR**). However, you may then receive advertising messages again in the future if the legal requirements are met.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR for direct advertising measures requiring your prior consent.

Art. 6 (1) sentence 1 point b) GDPR for the performance of a contract or pre-contractual measures (e.g., sweepstake contract).

Art. 6 (1) sentence 1 point f) GDPR for direct advertising measures that do not require explicit prior consent.

Our legitimate interest is to attract you to our offers and to establish a long-term customer relationship.

Art. 6 (1) sentence 1 point f) in connection with Art. 21 (3) GDPR for maintaining the advertising blocking list.

2 Cooperations, Partnerships and Rewards Programs

2.1 SIXT ONE Rewards Program

For the provision of the “SIXT ONE” rewards program, responsibilities deviating from the information under **CONTROLLER & CONTACT DETAILS OF THE DATA PROTECTION OFFICER** apply. Controllers within the meaning of Art. 26 GDPR are

- **Sixt One GmbH, Zugspitzstraße 1, 82049 Pullach, Germany** as the administrating legal entity of the rewards program, and
- the legal entities of the Sixt Group participating in the rewards program (“**Participating Sixt Company**”).

A list of all participating Sixt companies can be found in the Appendix of the privacy policy of the SIXT ONE rewards program. Unless otherwise stated in the privacy policy of the SIXT ONE rewards program, these companies are jointly responsible and act as joint controllers within the meaning of Art. 26 GDPR for the processing of your personal data in connection with the provision of SIXT ONE. The roles and responsibilities towards you under the applicable data protection laws, including the GDPR, are determined and allocated in joint controller agreements between the respective Controllers. SIXT will provide you with the essence of the arrangements upon request.

For any questions regarding data protection, you can contact us at any time at the following email address:

dataprotection@sixt.com

You can contact our data protection officer either via the above email address or at the address stated above (keyword: data protection officer).

For further information about data protection in connection with participation in the SIXT ONE rewards program, please refer to the privacy policy of the SIXT ONE rewards program, which can be found at <https://www.sixt.be/pages/privacy-policy/>.

2.2 Cooperation with Vehicle Manufacturers

Purposes of data processing

SIXT regularly conducts campaigns in cooperation with vehicle manufacturers, such as for test drives or the rental of certain car brands. The respective cooperation partners are named before the start of each campaign.

In this context, we may process your master data and reservation and rental data and, if required as part of the campaign, may share it with the respective cooperation partner. With your consent, the manufacturer may also contact you for marketing purposes, such as product reviews and satisfaction surveys.

Additionally, SIXT sometimes develops so-called “white label products,” such as websites and apps branded with a car manufacturer’s identity. Through these white label products, for example, vehicles of the

respective manufacturer can be rented through SIXT. The processing of personal data when using such white label products is carried out by SIXT for the purpose of fulfilling the contract. With your consent, we may pass your personal data on to the vehicle manufacturer. The privacy policy of the respective manufacturer applies to the processing of personal data by the vehicle manufacturer, which is usually available on their website, unless already available within the white label product. As part of such cooperation, marketing activities may also be carried out by SIXT or the cooperation partner, provided there is a suitable legal basis.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR for sharing data with cooperation partners and for direct marketing activities that require your express prior consent.

Art. 6 (1) sentence 1 point b) GDPR.

Art. 6 (1) sentence 1 point f) GDPR for direct marketing activities that do not require express prior consent.

Our legitimate interest is to attract you to our offers and to establish a long-term customer relationship.

2.3 Other Cooperations & Partnerships

Purposes of data processing

SIXT regularly cooperates with airlines, hotels, travel providers, credit institutions, and other partners to provide you with attractive offers, benefits, and similar advantages (e.g., collecting miles/points). As part of such cooperations, we may receive or transfer personal data – such as information about your membership status, points/miles, and similar – from or to the respective partner, insofar as this is necessary for the processing of the respective services or offers. For the processing of personal data by the respective partner, their own privacy policy applies, which can usually be found on their website.

In this context, we may process your master data, reservation and rental data, as well as loyalty & partner program data.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

VIII SIXT ACCOUNT & SIXT APP

For the processing of personal data in connection with the provision and management of the SIXT account as well as the SIXT app, notwithstanding the information provided under **CONTROLLER & CONTACT DETAILS OF THE DATA PROTECTION OFFICER**,

Sixt GmbH & Co. Autovermietung KG

Zugspitzstraße 1
82049 Pullach
Germany

is the responsible party (“controller”).

For any questions regarding data protection, you can contact the following email address at any time:

dataprotection@sixt.com

You can also contact the data protection officer either via the above email address or at the address stated above (keyword: data protection officer).

SIXT ACCOUNT

1 Creation & Verification of a SIXT account

Purposes of data processing

Your SIXT account allows you, for example, to store various payment methods in a digital wallet, save personal preferences to receive tailored offers in the future, as well as save different rates and other configurations to

personalize your booking process. Additionally, the SIXT account enables your participation in the **SIXT ONE Rewards Program**.

Please note that the use of our loyalty program SIXT ONE, as well as the use of **SIXT-charge**, requires the creation of a SIXT account.

In connection with the SIXT account, we process your master data, financial data (if you store a payment method in your account), driver's license data, as well as any voluntary data you add to your account. To use all features and benefits of a SIXT account and to make use of certain products, account verification is required. This can be done in the following ways:

- **Verification at a SIXT Branch**

Your account can be verified by having one of our employees check your identification document and driver's license during the so-called check-in process at one of our SIXT branches, compare this with your reservation data, and verify you accordingly. (see → **Identity / Driver's License Check**).

- **Verification via Mobile Check-In**

You also have the option to verify your account via "Mobile Check-In." Provided you have given your explicit consent, we verify your identity through an online verification process provided by an external service provider (see → **Mobile Check-In**).

- **Verification in the SIXT App**

You can also verify your account at any time in the SIXT App using the digital verification process by our external service providers (see → **Verification in the SIXT App**).

Depending on the verification method, we may process your master data, driver's license and ID/passport data, and special categories of personal data (biometric data). Your driver's license and verification result are stored in your account. The processing of biometric data mentioned above, however, takes place exclusively during the online verification process.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR in connection with Art. 9 (2) point a) GDPR for the online verification process and associated processing of biometric data.

Art. 6 (1) sentence 1 point b) GDPR for the creation of your account and for storing your driver's license and the verification result in your account.

Art. 6 (1) sentence 1 point f) GDPR for verifying your identity and driving license.

Our legitimate interest is to ensure that vehicles are provided only to uniquely identified persons holding a valid driving license.

2 Managing your SIXT account

Purposes of data processing

In your SIXT account, you can:

- Change and update your data (address, payment method, password, etc.),
- Manage your booking profiles,
- Manage your travel managers,
- View your bookings, subscriptions, and invoices,
- Access the help center,
- Delete your account.

For these purposes, we process your master data, reservation and rental data, invoice documents and transaction data, communication data, financial data (if you store a payment method in your account), driver's license data (if you store your driver's license in your account), as well as voluntary data and data of third parties (if you add a travel manager).

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

SIXT APP

1 Verification in the SIXT App

Purposes of data processing

To use all functions and benefits of the SIXT App and to access certain products (e.g., SIXT-share and the SIXT ONE loyalty program), the creation and verification of a SIXT account (see → [Creation & Verification of a SIXT account](#)) are required.

In the SIXT App, you will automatically be asked if you want to complete the verification, but you can always complete the verification later or update an already verified driver's license (e.g., if you have a new license document). For this identity and driver's license verification, we use online verification processes provided by our external service providers.

In this context, we may process – provided you have given your consent – your master data, driver's license data and identity card / passport data, as well as special categories of personal data (biometric data).

Your driver's license and verification result are stored in your account. The processing of biometric data described above only takes place during the online verification process. No further storage of special categories of personal data takes place.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR in connection with Art. 9 (2) point a) GDPR for the online verification process and the associated processing of biometric data.

Art. 6 (1) sentence 1 point f) GDPR for verifying your identity and driving license.

Our legitimate interest is to ensure that vehicles are provided only to uniquely identified persons holding a valid driving license.

2 Managing the SIXT account via the SIXT App

Purposes of data processing

You can also manage your SIXT account via the SIXT App (see → [Managing your SIXT account](#)).

In this context, we may process your master data, reservation and rental data, invoice documents and transaction data, communication data, financial data (if you store a payment method in your account), driver's license data (if stored in your account), as well as voluntary data and data of third parties if you add a Travel Manager.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

3 Using SIXT products in the SIXT App

Legal basis for the above processing

The products SIXT rent, SIXT+ car subscription, SIXT-ride, SIXT-share, and SIXT-charge, some of which are offered under deviating responsibilities, can also – or, in the case of SIXT-share and SIXT-charge exclusively – be used via the SIXT app. This includes in particular:

- reserving vehicles and concluding subscriptions,
- booking taxis, limousines, chauffeur and transfer services,
- managing and adjusting bookings, rentals, and subscriptions (e.g., adding additional drivers),
- viewing past rentals and subscriptions and downloading documents (e.g. invoices),
- using [SIXT-charge](#), [Mobile Check-In](#) and similar.

In this context, we process your master data, reservation and rental data, invoice documents and transaction

data, communication data, financial data, as well as voluntary data and data of third parties. Additionally, location data may be processed e.g. to show you the nearest SIXT stations, SIXT vehicles, and charging stations to your location in our SIXT app, provided you have enabled location sharing. You can disable access to your location at any time in your device settings.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR for processing your location data for the above-mentioned purposes.

Art. 6 (1) sentence 1 point b) GDPR.

IX ARTIFICIAL INTELLIGENCE ("AI")

As part of the processing of personal data described in this privacy policy, we may use artificial intelligence. This could be for example for the following purposes:

- Process support, optimization and automation,
- Creation and analysis of meeting minutes and transcripts,
- Personalization of offers,
- IT security support, e.g., by identifying security-related anomalies,
- Assistance with the creation, revision, translation, analysis, and review of content, as well as access to, preparation, and use of company knowledge,
- Data analysis, evaluation, and identification of patterns, trends, and correlations, as well as the creation of forecasts and decision support,

Artificial intelligence is used in accordance with the legal requirements of the GDPR and Regulation (EU) 2024/1689 – the Artificial Intelligence Act ("AI Act") – and serves exclusively supportive, preparatory, or controlling purposes. Automated decision-making or profiling with legal effect or similarly significant impact as defined in Art. 22 GDPR, as well as the training of AI models with your personal data, generally does not take place – unless you have given your explicit consent. The processing of your personal data occurs exclusively for the use of the respective AI function and, if necessary, for troubleshooting.

X SOURCES OF YOUR DATA

As a rule, we collect the personal data specified under **CATEGORIES OF PERSONAL DATA** directly from you. However, in the following cases, we may receive your data from the following third parties if they make a reservation on your behalf:

- Travel agencies, booking platforms, price comparison sites, or other travel agents
- Your employer or your employer's travel manager
- Road assistance service providers

In addition, we may also receive data from third parties in the following cases:

- For credit checks, we may request information from credit agencies and receive relevant data from them.
- If you are suspected of having committed an administrative offense (such as speeding or illegal parking) or a crime with one of our vehicles, we may receive data from authorities.

XI CATEGORIES OF RECIPIENTS OF YOUR DATA

The SIXT brand operates globally through a network of companies within the SIXT Group, franchise, agency, and cooperation country companies, as well as external partners and service providers. In connection with the provision of our mobility services, we may transfer your personal data to fulfill our contractual and legal obligations as well as to safeguard our legitimate interests to the following categories of recipients:

- **Companies of the SIXT Group**

For the purposes described in this privacy policy, we may transfer your personal data to companies within the SIXT group – for example, as part of providing group-internal services or to fulfill contracts in the case of cross-border

rentals in countries where SIXT is directly represented.

▪ **Franchise, agency, and cooperation country companies**

For the purposes described in this privacy policy, we may transfer your personal data to franchisees, agency and cooperation country companies if you choose to use our mobility services in these countries or at affiliated SIXT locations. These parties process your personal data as independent controllers.

This transfer of personal data may particularly take place if you make a reservation with one of our franchise partners, pick up or return your vehicle at one of their branches, or require assistance in a franchise country in the event of a breakdown.

▪ **External service providers**

For the purposes described in this privacy policy, we may transfer your personal data to specialized service providers. This particularly includes:

- IT service providers and hosting providers,
- Payment service providers and credit institutions,
- Credit agencies / service providers for credit checks and fraud prevention,
- Customer service providers / call centers,
- Appraisers, experts, and claims adjusters,
- Service providers for marketing and customer communications,
- Service providers for identity and document verification.

▪ **Employers**

If you use our mobility services, for example, in the context of business trips for your employer, we may transfer your master data, reservation and rental data, as well as invoice documents and transaction data to your employer for the purposes described in this privacy policy – such as for invoicing or providing reports.

▪ **Other recipients**

Additionally, we may transfer your personal data, for the purposes described in this privacy policy, to other recipients, which may include:

- Cooperation and rewards program partners (especially airlines, hotels, and credit institutions),
- Travel agencies, tour operators, and price comparison platforms/booking portals,
- Insurance companies,
- Debt collection agencies,
- Road assistance service providers,
- Authorities (e.g., tax authorities, law enforcement agencies, and fine offices),
- Lawyers and courts,
- Parking management companies,
- Auditors.

If the described data transfers are considered processing on behalf under Article 28 GDPR, we ensure that such processing is carried out exclusively based on data processing agreements that meet the legal requirements. These agreements oblige the processor, among other things, to process personal data only according to our instructions and for specified purposes, to maintain a level of data protection appropriate to the risk, and to comply with data protection obligations – especially in supporting the fulfillment of data subject rights and implementing appropriate technical and organizational measures.

If certain data transfers are conducted under joint responsibility pursuant to Article 26 GDPR, this is carried out based on a joint responsibility agreement. This specifies, in particular, the roles and responsibilities with regard to compliance with data protection requirements – such as which controller is responsible for fulfilling data subject rights or information obligations. SIXT will provide you with the essential contents of such agreements upon request.

XII TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

The recipients of your personal data mentioned in the previous section may, in some cases, be located in so-called third countries where the level of data protection is not comparable to that in the EU. Third countries are all countries outside the European Economic Area (EEA). The EEA includes all the countries of the European Union as well as the countries of the European Free Trade Association – namely, Norway, Iceland, and Liechtenstein.

Data transfers to such countries may occur, for example, if you reserve vehicles with us that are to be rented in a third country, if you make use of partner programs from third countries, in the case of accidents and/or damages in third countries, or if we use external service providers located in a third country.

Transfers of personal data to third countries are based on an adequacy decision by the European Commission. If there is no adequacy decision for the respective third country, the transfer occurs on the basis of appropriate safeguards within the meaning of Art. 46 (2) GDPR. Copies of these safeguards can be requested from SIXT at the address provided above (see → **CONTROLLER & CONTACT DETAILS OF THE DATA PROTECTION OFFICER**).

Additionally, some recipients of your personal data based in the USA are certified under the Data Privacy Framework (“DPF”). For these recipients, the European Commission has issued a limited adequacy decision for certain categories of data. Where the recipient is certified under the DPF, data transfer is based on this adequacy decision.

XIII STORAGE PERIOD

Generally, we store your personal data until the purpose for which it was collected no longer applies.

If we are legally obliged to store personal data, it will be stored for the duration of the legal obligation. These requirements include the statutory limitation periods, which can range from three to thirty years. In addition, retention periods of up to ten years may apply in accordance with tax and commercial law obligations. If necessary, your data will be blocked for ongoing operations during this period, provided that there is no other purpose for processing it. The legal basis for this storage is Art. 6 (1) point c) GDPR in connection with the respective legal obligation.

Below you will find an overview of key standard deletion periods:

- **Account**

We delete your SIXT account and the associated personal data after 6 years of inactivity. The retention of certain data due to tax and commercial law obligations remains unaffected by this.

- **Reservation & Rental Data**

The retention period for your reservation & rental data is 10 years, starting at the end of the year in which the underlying reservation/rental took place.

- **Invoice Documents & Transaction Data**

The retention period for your invoice documents and transaction data is 10 years, starting at the end of the year in which the underlying reservation/rental took place.

- **Driver's License**

We store your driver's license copy for 120 days. The retention period for your driver's license data, such as your driving license number, date and place of issue, expiration date, and the result of the validity check, is 4 years.

- **ID / Passport**

We delete your ID or passport data – such as your ID/passport number, date and place of issue, and expiration date after 120 days. The result of the validity check is stored for 4 years.

- **Customer Service**

Call recordings, which we have created with your consent during customer service phone calls, are deleted after 90 days.

Non-telephone communication contents (email, chat, etc.) are deleted 3 years after the end of the year in which you contacted our customer service.

In individual cases, your personal data may be stored beyond the above-mentioned standard deletion periods in line with applicable law – for example, for the assertion, exercise, or defense of legal claims.

XIV AUTOMATED DECISION-MAKING

For the aforementioned processing of personal data, we do not use automated decision-making as defined in Art. 22 GDPR.

XV DATA SUBJECT RIGHTS

Purposes of data processing

You can assert the rights mentioned below. Your requests to assert data protection rights and our responses to them will be stored for documentation purposes for a period of three years after the end of the year in which we responded to your request and in individual cases longer for the establishment, exercise or defense of legal claims.

Legal basis for the above processing

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest is protecting against claims or fines under Art. 82, 83 GDPR and fulfilling our accountability obligations under Art. 5 GDPR.

1 Right of access by the data subject, Art. 15 GDPR

You have the right to, at reasonable intervals, obtain information about your personal data under storage. The information you are entitled to includes information about whether or not SIXT has stored personal data concerning you, about the categories of personal data concerned, and about the purposes of the processing. Upon request, SIXT will provide you with a copy of the personal data that are processed.

If you wish that, as part of providing information about your personal data under storage, we also provide information about data collected through cookies or similar technologies when using our websites, we kindly ask you to provide us with your cookie IDs. You can find these in your browser, e.g. by opening the Developer Tools, selecting the “Console” tab, then entering the command “document.cookie” and confirming by pressing the Enter key. The cookie IDs will then be displayed.

If you also want information about any data collected through cookies or similar technologies while using our app, please provide us with a special device ID. On Android devices, this is called the AAID (Android Advertising ID) and can be found in your settings. On Apple devices, this is called the IDFA (ID for Advertisers) and is not visible by default. There are, however, third-party apps available in the Apple App Store to display this ID.

2 Right to rectification, Art. 16 GDPR

You also have the right to obtain from SIXT the rectification of inaccurate personal data concerning you or to have incomplete data completed.

3 Right to erasure, Art. 17 GDPR

You furthermore have the right to obtain from SIXT the erasure of personal data concerning you. We are under obligation to erase personal data in certain circumstances, including if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, if you withdraw the consent on which the processing is based, or if the personal data have been processed unlawfully.

4 Right to restriction of processing, Art. 18 GDPR

Under the legal requirements, you have the right to restriction of the processing of your personal data.

5 Right to data portability, Art. 20 GDPR

You have the right to receive the data that you have provided to us on the basis of your consent or a contractual

relationship in a machine-readable format, or – at your request – to have it transferred to a third party.

6 Right to object, Art. 21 GDPR

Right to object in certain cases

If the processing of your data by SIXT is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Art. 6 (1) sentence 1 point e) GDPR) or is based on the legitimate interests of SIXT (Art. 6 (1) sentence 1 point f) GDPR), then you have the right to object at any time, on grounds relating to your particular situation, to the processing of your data. This also applies to any profiling based on this provision as defined by Art. 4 no. 4 GDPR. We will then end the processing, unless we can present compelling legitimate grounds for such processing that supersede the grounds for ending the processing.

Right to object against the processing of data for the purposes of direct marketing

In individual cases, we process your personal data for direct marketing purposes. You have the right to object to your personal data being processed for the purposes of such marketing activities. This also applies to profiling to the extent that it is associated with such direct marketing.

If you object to your data being processed for direct marketing purposes, we will no longer process your personal data in this way. You may exercise your right to object without the need to adhere to a particular format and direct it to:

Sixt S.à.r.l.

Niveau Mezzanine N° 5-G09-1
1110 Findel
Luxembourg

or to the following email address: sixtcard@sixt.com

7 Right to withdraw your consent, Art. 7 (3) GDPR

If data processing at SIXT is based on your consent, then you have the right to, at any time, withdraw the consent you granted. The withdrawal of consent shall not affect the lawfulness of processing between the time consent was granted and the time it was withdrawn. You will be informed about your options to withdraw consent at the time of granting consent. Below you will find the main email addresses for withdrawing your consent.

- For the recording, transcription, and analysis of conversations with our customer service: dataprotection@sixt.com
- For the recording, transcription, and analysis of conversations with our sales representatives: sales-recording@sixt.com
- For the recording, transcription, and analysis of conversations via the video checkout: checkout-recording@sixt.com

You may withdraw any other consents you have given at any time, with effect for the future, by emailing dataprotection@sixt.com or using the withdrawal options specified at the time consent was granted.

8 Contact information to exercise the rights of data subjects

If you wish to exercise your rights as a data subject, please direct such requests to the e-mail address: dataprotection@sixt.com

9 Right to lodge a complaint, Art. 77 GDPR

You have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR). You can exercise this right before a supervisory authority in the Member State in which you are resident, where your place of work is or the place where the suspected infringement is committed.

In Bavaria, Germany – where Sixt GmbH & Co. Autovermietung KG is headquartered – the competent supervisory authority is:

Bayerisches Landesamt für Datenschutzaufsicht (BayLDA)
Promenade 18
91522 Ansbach
Germany

In Luxembourg, the competent supervisory authority is:

Commission Nationale pour la Protection des Données (CNPD)
15, Boulevard du Jazz
L-4370 Belvaux
Luxembourg

General information

We reserve the right to amend and adapt this Privacy Policy with effect for the future.

Current Version: May 2026