

# PRIVACY NOTICE



## **Privacy Notice**

Notice Last Updated: June 2018

Welcome to the Privacy Notice of Budget Rent A Car [Domicar Ltd.].

Please take the time to read this Privacy Notice as it is important for you to know how we collect and use your personal information. By "personal information" we mean all information that relates to a living individual and either identifies, or may be used to identify, that individual.

Budget may change portions of this Privacy Notice from time to time, so be sure to check back. If we make a change that significantly affects your rights or, to the extent we are permitted to do so, significantly changes how we use your personal information, we will notify you by way of a prominent posting on our websites, e-mail and/or postal mail prior to the change becoming effective.

## GETTING STARTED

Budget wants you to feel comfortable about giving us access to your personal information. Use this Privacy Notice to find out what happens to your personal information when you interact with Budget and what choices you have.

This Privacy Notice covers the personal information that Budget collects, use and disclose through your use of our products and services either online or offline.

Budget needs to collect personal information from you to rent a vehicle or provide our other services. We collect personal information when you give it to us, such as by telephone, fax, postal mail, email, at the counter, upon completion of an application or enrollment form, joining our Budget Club Members or through your use of Budget websites or mobile Apps or the use of our products and services.

Please be aware that, in certain circumstances, where you do not provide personal information which is required by us, we will not be able to provide the products and services under our contract with you or may not be able to comply with a legal obligation on us. For example, when renting a vehicle with us we will require information such as your name, address, payment information and driver's licence. If you fail to provide this information to us we will be unable to rent a vehicle to you. You will be made aware if this situation arises and what the consequences of not providing the personal information will be.

Sometimes, we will combine the personal information we receive from you with other information we received from other sources so we can provide you a more customised and hassle-free experience. This information may include your name, contact information, travel itinerary, booking request and other information that is relevant to your booking. These third parties include:

- Travel agents or a third-party booking service that you used to make your reservation;
- Your employer or association if you are using a corporate / association account;
- Our licensees and our affiliates, in order to create a Budget account or if you are making a booking in one location served by our affiliates or licensees for rental services in another location served by us; and
- Police and other law enforcement agencies if you are involved in an accident during your rental, or suffer any loss, damage or theft of the vehicle, or if you incur any speeding, parking, toll or other traffic-related fines or commit any traffic offences during your rental.

The purposes for which we use this information is set out in further detail in the rest of this Privacy Notice. There are a number of bases in data protection law that permit Budget to use your personal information for these purposes. These are: (1) that you have provided your consent to us using your personal information for that purpose (e.g. where you have given us your consent to send you electronic marketing); (2) that we need to use that personal information in order to fulfil our contract to provide products or services to you (e.g. using your information for vehicle rentals or join Budget Club Member); (3) that the processing is necessary for the purposes of our legitimate interests, provided we have balanced these against your rights and interests; and (4) where we need to comply with a legal obligation (e.g. responding to government or law enforcement information requests).

These legitimate interests are: (a) to ensure effective administration and management of your relationship with us, including any rentals with us; (b) to understand how our customers use our services and to manage our vehicle fleet; (c) to carry out research and analysis on what services or products our customers want or how they would like us to improve our services and products; (d) to understand how our customers use our websites and Apps and identify any issues in how the websites and Apps are used

and how we can improve the customers usage experience; (e) to tell our customers about the various products and services we can offer; (f) understand and respond to customer feedback; (g) to better tailor and personalise the promotions and benefits that we offer to our customers; (h) to prevent, detect, or investigate unauthorised use of our vehicles and systems and ensure we comply with law and our policies; and (i) manage any disputes and accidents and take legal or other professional advice.

We will collect technical information about your devices when you use our website and App where permitted. To learn about our online data collection, go to the [Online Data](#) section.

## **RENTING A VEHICLE**

When you make a reservation, rent a vehicle or join one of our programs, we collect information to provide you with our great services (for example, renting a vehicle, including performing the vehicle rental contract as set out in our General Conditions of Rental, Location Specific Conditions and Rental Agreement, providing any requested optional extras, taking payment, pre-authorisations and security deposits and providing discounts and offers or other benefits) and for our legitimate business interests (for example research and development of new products and services, undertaking fraud and security checks and enforcing our legal rights). The information we collect includes:

- name;
- email address (to receive e-receipts);
- home address (for license validation and billing);
- employer details and business address (if you are a member of a corporate program);
- telephone numbers at which we can reach you;
- date of birth (for license validation and legal requirements);
- payment information such as your credit or debit card details (security code is obtained for transaction only – we do not keep it);
- tax number (if specifically requested);
- information from driver's licence and/or other government issued identification, including if you are an additional driver for the specific rental (for license validation and legal requirements);
- information from another form of identification documentation such as passport or national identity card if your driver's licence does not include a photo or is not recognisable as you and/or proof of address such as a utility bill (for security and anti-fraud purposes). The information we collect and retain will only include your photo ID where you are informed of this;
- special discount codes, partner member numbers, association memberships, corporate rewards programs (if you request discounts, special privileges and points programs);
- special requests and preferences, including:
  - your preferences regarding optional extras such as damage waivers and other protections;
  - where a delivery or collection service is available, the address where we will drop off or pick-up the vehicle and any optional extras you requested; and
- other information that may be required to rent you a vehicle and/or provide you with services.

Some vehicles come equipped with a global positioning system (GPS) or similar type tracking device that may also collect information about the vehicle. To learn about vehicle data we collect, scroll down to read about Vehicle Data.

If you have an accident, or suffer any loss, theft or damage to the vehicle during your rental or suffer any mechanical failure, we will collect information regarding such incident including your report of the incident and any police or other third party report including details of those involved, together with the nature of

any personal injuries and/or damage to the vehicle and optional extras. We will use this information to perform our contract with you (for example, the vehicle rental agreement and/or the terms of any optional extra like insurance); for our legitimate business interests (for example, in recovering the costs of any loss or damage caused to the vehicle); for complying with any legal obligation on us (for example, making any required notification of the incident to appropriate authorities); and establishing, exercising or defending legal claims arising as a result of such incident.

During your rental we will collect where and when you rented the vehicle, where and when you returned the vehicle, insurance preferences, fuel consumption, mileage, accident history and other information related to the vehicle and your use of it. This information is required in order to provide you with the services you requested under the rental contract or for our legitimate business interests (for example to monitor the usage of our vehicle fleet).

In addition to the purposes listed above, we use this information to better understand our customers and provide you with relevant offers.

We will also collect information about any speeding, parking, toll or other traffic-related fines that you incur or any traffic offences that you commit during your rental where these are provided to us by any law enforcement agency. We will use this information to deal with such fine or offence in accordance with the terms of your vehicle rental agreement with us.

Where you inform us that you have a medical disability that requires an adapted vehicle or other driver aid we will use that information in order to provide you with the service you requested and where you have given your explicit consent to us using that information.

When you call us (from any phone), we may record or monitor the call for quality control, training or similar purposes.

When you purchase a gift certificate or voucher, we collect the name and mailing address of the gift recipient in order to fulfill your order. We will only use this information for the specific reason for which it is provided. If you believe that one of your contacts has provided us with your personal information and you would like to request that it be removed from our database, please contact our customer service.

## **BUDGET CLUB MEMBERS**

If you decide to join our **Budget Club Members** we will collect and retain your name, contact details, drivers licence details, and date of birth to create an **Budget Club Members** account for you in accordance with the terms and conditions of the **Budget Club Members** programme,

We will use this information, along with information relating to your historic and future rentals, to allow you to take the benefits of membership of the **Budget Club Members**, including fast-track service at our rental counters, the ability to self-service elements of the rental through our App, and to provide you with further benefits to which you are entitled under the programme such as free upgrades and free rentals.

We also use this information to tailor the communications we may send to you and/or the promotions we may offer to you as a member of **Budget Club Members** from time to time.

We will also use this information for our internal analysis of how our customers use our services and to improve how we provide our services.

## **INSURANCE PRODUCTS**

In the event that you make any claim under one of these insurance products, your personal information relating to the claim will be provided to the insurer and any appointed claims handler. We do this to fulfil the terms of our agreement with you and to establish, exercise or defend any associated legal claims.

The use of your personal information by that insurer will be subject to the terms of that insurer's privacy notice.

## **VEHICLE DATA**

Some vehicles you rent from Budget have been manufactured or equipped with on-board devices so as to be connected to the internet (connected car) which allow us to send commands to and receive certain information from the vehicle, including geolocation data from a global positioning system (GPS). If you rent a connected car from us your personal information will be processed in accordance with this Notice and the Connected Cars Privacy Addendum included in the General Conditions of Rental (or such other notice regarding connected cars as we may provide to you in the future).

## **PHOTOS & VIDEO**

Where indicated by signage at the relevant location, Budget rental locations are also equipped with video security surveillance systems as well as cameras that record as our vehicles depart/enter our lots.

## **ONLINE DATA**

When you download, visit and use our websites and/or Apps, Budget automatically collects technical information. This section tells you more about what technical information we collect and why we collect it.

We may collect your browser type, Internet Service Provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/ or clickstream data to analyse trends in the aggregate and administer the site.

*Session Replay:* When you visit our website, we will sometimes also record information about your browsing session on the site, including which pages you visited and any forms on the website that you completed. We review this information to identify any technical issues in the operation of our sites and to improve the user interface our sites. We use a third party to help us with this service and this information will be passed to that third party for this purpose but this information is not disclosed to any other third party.

## ONLINE ADVERTISING

Budget uses third-parties to provide online or electronic ads on our behalf. These third parties use data about your visits to our websites and Apps usage to send you customised ads that may be of interest to you. This information is collected using cookies, scripts, pixel tags, etags, web beacons and other similar technologies by Budget and our third-party advertising partners.

## MARKETING

Budget may share personal information with third parties (as detailed in the Information Sharing section) to help us with our marketing and promotional projects, such as managing our social media pages, running contests, sweepstakes and other promotions, or sending marketing communications.

We will only use your personal information to send you marketing where you have given us your consent to receive marketing or we are otherwise permitted by applicable law to do so. This marketing will be sent to you either electronically or to your postal address.

Don't want to receive promotional and marketing post, emails and text messages from Budget? No problem! You can withdraw your consent to direct marketing or tell us you do not want to receive such marketing at any time.

## ANALYTICS

We use analytic software, such as Google Analytics and others, to help us to better understand the functionality of our software on our websites and Apps on your device. These software tools record technical information including about your device together with usage information such as how often you use our website or App, which features you use or don't use in the website App or which pages you visit on the website, aggregated usage, performance data, where the App was downloaded from and information about your visit to the site, including details of some of the URL clickstream to, through and from our website.

## CHILDREN

Budget's websites, Apps and services are not for children under the age of 16. This includes any links to other websites that we provide for your convenience. We don't knowingly collect personal information from children for any reason. If you think Budget has received personal information of your child or another minor, please contact our Data Protection Officer.

## INFORMATION SHARING

Budget may use and share your personal information and vehicle data to affiliated and non-affiliated organisations as follows:

Third party recipient	Purpose of disclosure	Legal Basis for Processing
Independent licensees / franchisees and network providers in order to perform our contract with you and to understand how you use our	<ul style="list-style-type: none"><li>• Make and confirm your rental reservation;</li><li>• Provide our rewards program and update partner points and rewards;</li></ul>	<ul style="list-style-type: none"><li>• Performance of Contract;</li><li>• Legitimate Interests;</li><li>• Legal obligations or</li></ul>

<p>services and to improve our business</p>	<ul style="list-style-type: none"> <li>• Connect with your corporate and commercial accounts;</li> <li>• Assist with navigation assistance or itinerary planning;</li> <li>• Provide customer assistance;</li> <li>• Resolve toll, traffic or parking violations;</li> <li>• Processing any claims relating to accidents and/or injuries;</li> <li>• Providing roadside assistance services;</li> <li>• To protect or defend the rights or well-being of us, our employees, customers or others;</li> <li>• Verify safe driver criteria for qualified drivers.</li> </ul>	<ul style="list-style-type: none"> <li>• Consent.</li> </ul>
<p>Travel agents in order to perform our contract with you when you use a travel agent and to understand how you use our services and to improve our business</p>	<ul style="list-style-type: none"> <li>• Make and confirm your rental reservation;</li> <li>• Process payments and refunds;</li> <li>• Assist with navigation assistance or itinerary planning;</li> <li>• Provide customer assistance;</li> <li>• Providing roadside assistance services;</li> <li>• To protect or defend the rights or well-being of us, our employees, customers or others.</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of Contract; or</li> <li>• Legitimate Interests.</li> </ul>
<p>Your employer or organisation in order to provide you with benefits of a corporate or association program and to understand how you use our services and to improve our business</p>	<ul style="list-style-type: none"> <li>• Verify drivers licenses or other government identification.</li> <li>• Verify eligibility to use designated account and discount codes;</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of Contract; or</li> <li>• Legitimate interests.</li> </ul>
	<ul style="list-style-type: none"> <li>• Connect with your corporate and commercial accounts.</li> </ul>	
<p>Brokers in order to perform our</p>	<ul style="list-style-type: none"> <li>• Make and confirm your rental</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate</li> </ul>

<p>contract with you when you book a rental through their service and to protect our business from fraud and bad debts</p>	<p>reservation;</p> <ul style="list-style-type: none"> <li>• Process payments and refunds;</li> <li>• Provide customer assistance;</li> <li>• Handle debt collection;</li> <li>• Fraud check.</li> </ul>	<p>Interests.</p>
<p>Booking engines in order to perform our contract with you when you use a booking engine and to understand how you use our services and to improve our business</p>	<ul style="list-style-type: none"> <li>• Make and confirm your rental reservation.</li> <li>• Verify eligibility to use designated account and discount codes;</li> <li>• Process payments and refunds;</li> <li>• To protect or defend the rights or well-being of us, our employees, customers or others.</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of Contract; or</li> <li>• Legitimate Interests.</li> </ul>
<p>Credit card issuers in order to obtain payment from you</p>	<ul style="list-style-type: none"> <li>• Process payments and refunds;</li> <li>• Fraud check;</li> <li>• Handle debt collection.</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of Contract; or</li> <li>• Legitimate Interests.</li> </ul>
<p>Corporate account manager in order to provide you with benefits of a corporate or association program and to understand how you use our services and to improve our business</p>	<p>If you are renting with a corporate, membership or other similar commercial entity account, we may share personal information with the organisation that manages the account for their own purposes. We recommend you review their privacy policy to learn more about their privacy practices.</p>	<ul style="list-style-type: none"> <li>• Performance of Contract; or</li> <li>• Legitimate interests.</li> </ul>
<p>Marketing agent in order to provide you with benefits of a corporate or association program and to understand how you use our services and to improve our business</p>	<ul style="list-style-type: none"> <li>• Provide our rewards program and update partner points and rewards;</li> <li>• To protect or defend the rights or well-being of us, our employees, customers or others.</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of Contract; or</li> <li>• Legitimate Interests.</li> </ul>
<p>IT service providers including IT platform providers and website analytics service providers in order to perform our contract with you and to understand how you use our services and to improve our business</p>	<ul style="list-style-type: none"> <li>• Support our IT systems and infrastructure;</li> <li>• Provide maintenance services for our IT systems and infrastructure;</li> <li>• Provision of data hosting and other data processing</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests.</li> </ul>

	<p>services;</p> <ul style="list-style-type: none"> <li>• Provide analytics services relating to your use of our website to identify any technical or user interface issues and/or improvements in connection with the website</li> </ul>	
Government, regulatory and law enforcement agencies in order to meet our legal obligations	<ul style="list-style-type: none"> <li>• To verify your driver's license and ensure you meet our safe driver criteria;</li> <li>• As requested by these agencies if the disclosure is required or permitted by law;</li> <li>• To take action regarding illegal activities, traffic offences or violations of terms of service;</li> <li>• If we have a good faith belief that there is an emergency that poses a threat to the safety of you or another person; and</li> <li>• As otherwise required or permitted by law.</li> </ul>	<ul style="list-style-type: none"> <li>• Legal requirement; or</li> <li>• Legitimate interests.</li> </ul>
Insurance companies and claims handlers in respect of any insurance product you purchase in connection with your rental	<ul style="list-style-type: none"> <li>• Provide and service the insurance product you have requested;</li> <li>• Manage any claims that may be made under the relevant insurance policy</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of contract; or</li> <li>• Legitimate interests.</li> </ul>

We may also transfer or assign your personal information to third parties as a result of, or in connection with a sale, merger, consolidation, change in control, transfer of assets, bankruptcy, reorganisation, or liquidation. Or if we are involved in defending a legal claim, information about you that is relevant to such claim may be disclosed to third parties as a result of, or in connection with, associated legal proceedings.

We may, in accordance with the [Marketing](#) section, share your information with business and promotional partners (where you have provided your consent to such information sharing) in order to send you

information about products and services you may like. If you decide you no longer want to receive such promotional and marketing messages, please read the Your Choices section to find out how you can opt-out.

## **YOUR CHOICES**

If you want to opt out of receiving promotional and marketing emails, text messages, post and other forms of communications from Budget or our promotional partners in relation to which you might receive in accordance with the [Marketing](#) section, you can best opt out by using one of the following ways:

- Click "unsubscribe" at the bottom of an email we sent you.
- Send an email to our [Data Controllers Officer](#).

If you do opt out of receiving promotional and marketing messages, we can still contact you regarding our business relationship with you, such as account status and activity updates, survey requests in respect of products and services we have provided to you after you rent from us, reservation confirmations or respond to your inquiries or complaints, and similar communications.

## **SAFEGUARDS**

The security of your personal information is important to us. We take reasonable steps to make sure your information is protected from unauthorised use, access, disclosure, alteration, destruction or loss. For financial or payment information, we use firewalls and Transport Layer Security (TLS) encryption. We take security extremely seriously but as no system is 100% secure, we can't completely guarantee the protection of your personal information, any more than any other organisation can.

We do not ask for financial or payment information, such as your credit card number, passcode, account number or pin number, in an e-mail, text or any other communication that we send to you. Please always check that any website on which you are asked for financial or payment information in relation to our rentals or services is operated by Budget. If you do receive a suspicious request, do not provide your information and report it by contacting one of our customer service representatives.

You are responsible for keeping your account passcode, membership numbers and pin numbers safe and secure. Don't share those with anyone. If there is an unauthorised use or any other breach of security involving your information, you must notify us at the customer service contact information below as soon as possible.

## **INFORMATION RETENTION**

Budget keeps your personal information for no longer than is reasonably necessary or required by law. How long we keep it depends very much on the type of information and purpose.

## **INTERNATIONAL TRANSFERS**

### *Rentals*

As we offer the ability to rent vehicles and benefit from our services in many locations globally, we will transfer your personal information to our affiliates, independent licensees and travel agents in these locations for the purposes of fulfilling your rental request and/or entering into a rental agreement. The exact location of where your personal data will be transferred depends on the location of your rental.

Many of the countries to which your personal information may be transferred for these purposes that are located outside the EU do not benefit from an adequacy decision issued by the EU Commission regarding protection afforded to personal information in that country. Details of these specific countries can be found

here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).

These transfers are made either as they are necessary for the performance of a contract to which you will be a party, or for pre-contractual measures. Alternatively, adequacy of data protection is ensured by standard data protection clauses that we have in place with the relevant recipient.

## YOUR PRIVACY RIGHTS

You may have – in accordance with applicable data protection laws – the following rights when it comes to our handling of your personal information:

- **Right of access** – you may have the right to request a copy of the personal information we have about you and to request supporting information explaining how the personal information is used.
- **Right of rectification** – you may have the right to request that we rectify inaccurate personal information about you.
- **Right of erasure** – you may have the right to request that we erase personal information about you, in accordance with the Israeli law and regulation.
- **Right to restrict processing** – in some situations, you may have the right to request that we do not use the personal information you have provided (e.g. if you believe it to be inaccurate).
- **Right to data portability** – you may have the right to receive certain of your personal information in a structured, commonly used and machine-readable format and to transmit such information to another controller.
- **Right to withdraw consent** – where we process your personal information based on consent (including direct marketing consents), you have the right to withdraw consent at any time. However, this will not affect the lawfulness of the processing based on consent before its withdrawal. Furthermore, even in case of a withdrawal we may continue to use your personal information as permitted or required by law.

## DATA CONTROLLERS AND CONTACT DETAILS

You can contact our Data Protection Officer in respect of any issues or questions you have regarding our processing of your personal information. They act as the Data Protection Officer in respect of all of the data controllers listed below and can be contacted at:

Email: [dpo@budget.co.il](mailto:dpo@budget.co.il)

Postal Address: Data Privacy Officer, Budget House, 1 Sharon St., Airport City, Israel

Telephone: +972 (03)935-0000