This policy was last updated on August 7th, 2023.

Enterprise Holdings, Inc., through its independent regional subsidiaries (collectively "Enterprise Holdings") and network of independent franchisees and fulfillment partners operating the Enterprise Rent-A-Car, National Car Rental, Alamo Rent A Car brands provides global reservation and rental management services. This site is for an authorized franchisee. For data sharing and global booking practices of Enterprise Holdings, see the Enterprise Holdings Global Privacy Policy.

For information about the privacy practices of the authorized Franchisee for this country, please see below.

At ANC Car S.A ("we", "our" or "us"), we respect your privacy. We have implemented this privacy policy ("Privacy Policy") to explain our data collection and use practices. You can learn more in the sections below

What Information We Collect

## **Information Collected About You**

As a franchisee of Enterprise Holdings, Inc. and/or any of its relevant subsidiaries ("Enterprise"), Enterprise may share with us your reservation and booking information. For these transactions, we and Enterprise are independent data controllers. We also share information about you with Enterprise, as described below in the section titled "Who We Share Information With".

You may provide us with certain information in connection with a transaction or in your interactions with our websites and at our locations. We collect the following types of personal information from you:

- Your name, contact information, date of birth, driver's license number and expiration date and emergency contact information;
- Vehicle rental information, including the location of where the vehicle is rented, date of rental, type of rental and your preferences;
- Your credit card details, Enterprise, Alamo or National rewards information, online user account details, membership/corporate ID numbers, passport information and frequent flyer or travel partner affiliations;
- Information you provide regarding your marketing preferences or in the course of participating in surveys or promotional offers;

Third parties provide us with additional information about you, including:

- Referral Sources, such as third party online booking sites (who provide us general
  contact information and a booking confirmation number to facilitate the rental), your
  employer (general contact information), and your insurance provider (general contact
  and policy information).
- Where applicable, our Refer-A-Friend programs.
- Hotel, airline and membership clubs, who provide us your general contact information and booking information.
- Credit reporting agencies, who, for fraud prevention purposes, provide us with identityrelated information.
- Service Providers, such as customer support (customer service-related information and enquiries made by you), customer survey providers (your response to our customer

service surveys) and marketing providers (information to assist us to better communicate our products and services).

With your consent, we will access location-based information or collect location markers from your mobile device or based on your IP address. We will use this information to provide you with notifications related to our locations, return information, local offers or other information that we think will be helpful in providing you with better services. We do not use this information to specifically locate you for any reason other than to provide you the service. With your consent, our application will utilize your device's camera. If you have allowed us to utilize your location information or your device's camera in the past and wish to revoke the permissions, please change the settings on your device.

# **Vehicle Operation and Location**

Your vehicle may be equipped with (i) emergency notification functionalities such as an eCall System and (ii) telematics systems and infotainment ("Telematics Systems") which are independently controlled by the manufacturer ("OEM") of your vehicle. The eCall System is provided in order to ensure that you and your passengers receive appropriate assistance in the case of an emergency. In the event that a vehicle has been reported as potentially or actually lost or stolen, we will request access to the necessary Telematics Systems data from the relevant OEM. Contact details of the OEMs along with their applicable privacy disclosure which may include system and service limitations, warranty exclusions, limitations of liability, descriptions of use, disclosure and retention of information, your individual rights, and any data transfer outside the your jurisdiction may be found on the OEM's websites or may be available via the vehicle dashboard.

When you use any satellite navigation or infotainment system in this vehicle, you are responsible for any information that is stored in the systems as a result of your use. We cannot guarantee the privacy or confidentiality of such information, and you must wipe it before you return the vehicle to us. If you do not do this, the next users of the vehicle will be able to access this information

## **Children's Privacy**

Our websites and online marketing are not directed to, and ANC Car S.A. does not knowingly collect personal information from, children under the age of 18 or your country's age of minority. If you nevertheless believe that your child has provided us with their personal information and you need to let us know to delete it, please contact us using the link at the top of this page.

How We Use Information About You

We use the information we collect from you or about you to provide you with our services and for the following purposes:

- Where it is necessary for us to enter into a contract with you and provide services to you for the duration of the contract, including
  - o To assist the transactions that you request, such as reserving, renting, purchasing or leasing motor vehicles.
  - To provide customer service related to your interactions with us or to respond to your enquiry.
  - To enroll you in our loyalty programs and send non-promotional information relating to your ongoing membership of these programs.

## • Where necessary for us to comply with a legal obligation, including

- O To share information about your vehicle's location with emergency services in the event that you are involved in a road accident.
- o To share information with government and regulatory authorities when required by law or in response to legal process, obligation, or request.

# • Where it is necessary for our legitimate interests, as listed below, and where our interests are not overridden by your data protection rights, including

- To communicate important information about your rental, such as arrival and return alerts. These communications, which are transactional in nature, will be sent to you via email or SMS.
- To protect our legal rights and manage the security of our networks and property. For example, we will use CCTV to ensure the security of our premises and we maintain Do Not Rent lists of customers that are non-payment or safety risks
- O To assist us in providing better products and services: for example, to evaluate the performance of our staff, to assess the quality of products and services received and to help us improve our websites, facilities and services.
- To compile statistics and analysis about our customers' use of our websites, products and services. These statistics are used only to enable us to provide better customer service, products, features and functionality to you and other customers in the future.
- To develop a profile of you and your interactions with us so that we can provide tailored offers, opportunities and services that may be of interest to you.
- To share your information with third parties in order to prevent fraud and protect our business interests and rights, privacy, safety and property, or that of the public. We will do this to collect unpaid bills, to avoid liability for penalties you incur (e.g. traffic citations) and for claims processing purposes.
- O To share your information with third parties in order to permit us to pursue available remedies or limit damage that we may sustain and to enforce the terms of any rental agreement or our websites' terms and conditions. We will also disclose your information to third parties if the rights of another individual may be violated.

## • Where you have given consent, including

- O To assist us in providing you with the most appropriate vehicles, such as those with adaptive driving devices. In some cases, this will require us to infer or explicitly collect information about your health or physical condition.
- O To enable us to use telematics (e.g., for the purposes of tracking mileage and location in the event of theft and to alert us if the telematics systems has been removed or tampered with).
- To send you certain promotional or targeted marketing communications, opportunities and services that may be of interest to you. These will include invitations to join our loyalty programs, upgrade announcements, electronic newsletters and communications regarding an incomplete online membership form or reservation. Some of these offers will be received in advertising on non-Enterprise sites, including on social media.
- To send you text messages in order to provide you with time sensitive communications related to your transaction (e.g., construction delay at airport branch), extended rental opportunities, customer experience surveys, marketing promotions such as coupons, discounts, last-minute specials or loyalty and rewards information.

We retain your personal information for as long as we need to fulfil our business purposes, as set out below:

- Marketing purposes: We keep data linked to cookies and other online identifiers up to three years. We keep other marketing information, such as email subscription and loyalty enrollment data for up to 7 years after your last interaction with us.
- **Rental transactions**: We keep the data associated to your rental agreement for up to 7 years from the date of the rental, subject to other local legal requirements. We keep records of payments you have made for 2 years from the date of the transaction (depending on the location of the rental).
- **Customer service related queries**: We keep general queries for 3 years, unless you make a complaint, in which case, we keep complaints data for 7 years.
- **Disputes & law enforcement**: If we are involved in litigation or a governmental or regulatory investigation, then we keep data throughout the period of litigation or investigation and for 5 years after that. If a settlement means that we have to keep data for longer, then we keep data for the period required to administer the settlement. If we provide data to law enforcement agencies, then we keep a record of this for one year beyond the end of the investigation.

Who We Share Information With

#### Licensor

The nature of the business and operations require us to share your reservation and booking information with our Headquarters EHI Holdings. For these transactions, Grupo ANC is an independent data controller or equivalent under applicable law and will maintain its own privacy policy in respect of the rental data that you provide to Enterprise Holdings. You are encouraged to check the privacy policy of the Franchisee that is applicable to your transaction.

To identify who is the data controller or equivalent under applicable law in respect of your personal information, visit the Contact Us page.

## **Our Service Providers And Business Partners**

We will share your information with third parties, such as (1) payment, administrative and technical support providers or our insurance replacement, corporate rental or other customers or partners to facilitate the rental transaction and rewards programs with Enterprise Holdings group members, (2) companies who conduct customer research or satisfaction surveys on our behalf, (3) communication providers which send email and other marketing and service-related communications to you on our behalf, (4) customer support providers, such as the provider of our live chat feature, in order to provide you customer service, (5) debt collection providers, (6) claims processors, and (7) our advertising and marketing partners and third-party media properties, including social media sites, with whom we share aggregated or de-identified information about our customers, to allow them to send targeted advertising messages on our behalf, to analyze, enhance and manage our data, conduct mobile analytics services and to maintain and improve our services (subject to confidentiality agreements as appropriate).

# **Government Authorities**

Your personal information may also be shared with government authorities as outlined above.

## Sale, Merger or Change in Control

Your information may also be transferred to another company in the event of a transfer, change of ownership, reorganization or assignment of all or part of Enterprise Holdings' businesses or assets. This will occur if the parties have entered into an agreement under which the collection, use and disclosure of the information is limited to those purposes of the business transaction, including a determination whether or not to proceed with the business transaction. You will be notified via email or prominent notice on our websites for thirty (30) days of any such change in ownership or control of your personal information or as otherwise may be required or permitted by law.

## **Testimonials**

We may post customer testimonials on our websites which may contain personal information. We use a third-party provider to manage this process. This provider is responsible for obtaining your consent as necessary, removing content upon your request and answering any questions you may have.

## Global Data Transfers And Processing

In order for us to operate and provide you services globally, the information you provide us or that we collect may be transferred or accessed by entities around the world, including:

- Enterprise: If you book a reservation with us or with an Enterprise corporate-owned location, we will transfer your personal information to Enterprise. Enterprise Holdings, Inc. is based in the United States and has corporate-owned locations in the United States, Canada, Germany, Spain, France, Ireland and the United Kingdom.
- Third Party Service Providers: We utilize third party service providers who are located outside the countries where we have corporate-owned locations, such as call center support, claims processors and IT providers. When we transfer your personal information to our third-party service providers who are located outside the EEA, we use European Commission-approved standard contractual clauses.

# **Your Rights**

We reserve the right not to allow access to your information or to limit your rights. In some instances, this may mean that we are able to retain your personal information even if you withdraw your consent.

Other rights you have may include: 1) asking for a copy of your personal information, 2) to correct it, 3) to erase certain categories or types of information, 4) to restrict certain processing, 5) to obtain the information you provide in a structured, machine readable format and 6) to transfer some of this information to other organizations.

You have the right to object to processing of personal information on the basis of our legitimate interests. Where we have asked for your consent to process information, you have the right to withdraw this consent at any time.

# **Marketing Preferences**

You have the right to object to direct marketing as well as profiling we perform for the purposes of direct marketing. You will be able to opt out of direct marketing communications from

Enterprise Holdings and our Affiliates and Franchisees by following the instructions in each communication you receive. You may also contact us directly using the link at the top of this page.

You can opt out of display ads you see on non-Enterprise sites by clicking on ad choices icon in the ad or through the privacy settings on the site.

# Changes To These Policies

As necessary, we will update our Privacy Policy and Cookie Policy to reflect changes in our privacy practices. If we make any material changes, we will notify you by email (sent to the email address specified in your account) or by means of a notice on this site or as otherwise may be required or permitted by law, prior to the change becoming effective. We encourage you to periodically review this site for the latest information on our privacy practices.

## DATA CONTROLLER CONTACT INFORMATION

If you are making a rental, or visiting a website or mobile site, in the following countries, the data controller will be listed as below.

Country	Data Controller	Contact Information
Costa Rica	ANC Car S.A.	La Asunción de Belén, Heredia, Costa Rica. Tel. (506)2242 7800. With Customer Services 24/7. Customere.services@enterprise.cr