Privacy and use of cookies policy

Optimo Rent is committed to protecting the privacy of users and declares itself responsible for the security of customers data. Optimo Rent will be clear and transparent about the information it collects and what it does with this information.

All personal data are collected and processed in compliance with Italian and EU data protection laws.

In order to provide its car rental service Optimo Rent collects from the customer the required details, and in particular the following data:

- Name, surname, address, phone number, e-mail address, date and place of birth, driving license details, passport and/or ID details, credit cards necessary to process the payment.
- Details regarding place, date and time of collection and return of the rental vehicle, airline details and arrival flight number.
- Information on any event and/or accident taking place during the rental period (including those of the counterparties or third parties involved in the event).

The information mentioned above is collected by Optimo Rent through:

- Websites and apps run by Optimo Rent.
- Phone calls between customer and the Optimo Rent booking center and/customer care
- rental agreements.
- Third parties' websites and booking online
- Reports regarding accidents occurred during the rentals.

Optimo Rent website, together with the html e-mails, might contain links to websites run by third parties which co-operate with Optimo Rent. Optimo Rent has no control or access to data and information gathered by these third party run websites; therefore, the procedures used by the third party websites for the handling of personal will be available for the user to view and eventually accept on each occasion.

The Customer's personal data will only be kept on file in case these might be required, however, not for any longer than the maximum time period allowed by the current regulations.

A wide range of safety regulations and procedures have been put in place by Optimo Rent to protect the personal data collected from the possibility of unlawful use, sharing, alteration, loss, destruction or to be accessed by unauthorized third parties. The access to the data is permitted exclusively to those who have the absolute necessity of making use of these to provide a requested service. It must be made clear, however, that even with all the possible precautions taken, no existing filing or transmission system can prevent the possibility of loss, interception, or unauthorized use of the communicated data (i.e. Postal service, telephone, fax and internet communications).

The customers' personal data can be forwarded to third parties including: local or national

authorities and law enforcement agencies, insurance companies, credit card circuits, partners and/or companies which are part of Optimo Rent circuit, debt recovery agencies and companies providing to Optimo Rent marketing services. The forwarded data will be exclusively used to carry out all those required previously agreed activities and always in accordance with the present Privacy regulations.

The personal data collected by Optimo Rent will be mainly used for the reservation process and the rental service, to provide customer assistance and to draw up all the financial and fiscal documentation. Some of the above mentioned services might be provided by collaborating or subsidiary companies of Optimo Rent. Once the customer provides the personal data to make a reservation or to start a rental agreement; the customer then accepts and authorizes the use of the data based on the indications and information presented in this paragraph. The personal data and details of the credit card used for the payment might need to be forwarded to the Credit Card provider or to affiliated companies. Optimo Rent is authorized to communicate the customer's personal data:

- To safeguard the company's business and trading activity
- For the purpose of limiting any issues or damages that might occur through neglect or curtailment of any of the regulations pertaining to the rental agreement
- to implement the debts recovery
- to allow the solving of criminal acts of any nature in collaboration with official law enforcement and administration agencies (i.e. embezzlement, theft)

For the above mentioned purposes it will be possible to communicate the personal data to third parties (i.e. Law enforcement agencies, debt recovery agencies, long-term rental companies, insurance companies) without prior notice.

In case of data for marketing or commercial purposes the customer will always have the possibility of choosing to accept to authorize the use of personal data. The collection and the use of the data is finalized to the proposal of programs and commercial offers or mobility services. The authorization from the customer will therefore determine the eventual commercial contact for:

a variety of communications from our company through the sending of newsletters (commercial programs, offers, promotions etc...) with contents related to commercial offers, promotions regarding Optimo Rent initiatives or initiatives by its commercial partners.

Optimo Rent does not collect nor makes use of any sensible data of its customers.

Optimo Rent applies the maximum diligence in making sure the collected data is always correct and updated for the required purposes.

However, wherever a mistake or a missed update might take place, the customer will be able to request access to his or her personal data, and will have the possibility of amending any incorrect details and/or be informed of what the data is being used for. In these circumstances the customer will need to send the eventual requests directly to Optimo Rent's head office at the following address: Optimo Rent – Via Borsellino n. 29 - 36050 Bolzano Vicentino (VI).

Optimo Rent reserves the right to amend in future the current Privacy Policy conforming to the laws in force.

The holder of the management of collected personal data collected and used on Optimo Rent customers pursuant to Legislative Decree 196/2003 and provisions of the European Parliament regulation (EU) 2016/679. treated in compliance with Italian and EU data protection laws. is Optimo Rent with registered office in Bolzano Vicentino, Via Borsellino n. 29

International data transfer

Optimo Rent is active in several jurisdictions, some of which are not located in the European Economic Area (EEA) such as Morocco. Although countries outside the EEA do not always have strict data protection laws, we require our service providers to process data securely and in compliance with Italian and EU data protection legislation. We use the standard means provided for by the Community legislation to legitimize data transfers outside the EEA.

Data protection rights

In certain circumstances provided for by Italian and European legislation, you have the right to:

- Require us if we have personal information about you and, if so, what such information is and why we process it / use it.
- Require the access to your personal information (commonly known as "data access request"). This allows you to receive a copy of the personal information of the user in our possession and to check its correct processing.
- Require the correction of the personal information of the user in our possession. This allows the user to correct any incomplete or inaccurate information.
- Require the cancellation of your personal information. This allows you to ask us to delete or remove personal information where there are no valid reasons for continuing to process it. You also have the right to ask us to delete or remove your personal information if you have exercised your right to object to the treatment (see below).
- Oppose to the processing of personal data in which a legitimate interest (or of a third party) is invoked and there are elements relating to a specific personal situation that lead to oppose the treatment. You also have the right to object to processing where your personal information is used for direct marketing purposes.
- Require the cancellation of your personal information. This allows to ask us to delete or remove information
- Oppose to automated decision making, including profiling, which should not be subject to any automatic decision-making process on our part through the use of personal information or user profiling.
- Require the limitation of the processing of personal information. This allows to ask us to suspend the processing of personal data, for example if we want to verify the accuracy or the reasons.
- Require the transfer of personal information in electronic and structured form to the user or to another party (commonly known as the right to "data portability"). This allows you to take your data in our possession in an electronically usable format and transfer them to another part in an electronically usable format where there are no valid reasons for continuing to process them. You also have the right to ask us to delete or remove your personal information if you have exercised your right to object to the treatment (see below).
- Oppose to the processing of personal data in which a legitimate interest (or of a third party) is invoked and there are elements relating to a specific personal situation that lead to oppose the treatment. You also have the right to object to processing when your personal information is used for direct marketing purposes.
- Withdraw the consent. In the limited circumstances in which you may have consented to the collection, processing and transfer of your personal information for a specific purpose, you have the

right to revoke it for such specific treatment at any time. Upon receipt of the consent revocation notification, we will no longer process the user information for the originally agreed purpose or purpose other than on the basis of another legitimate basis.

If you wish to exercise any of these rights, please send your request to the following e-mail address: info@optimorent.com

You will not have to pay any costs to access your personal information (or to exercise one of the other rights). However, if the request for access is clearly unfounded or excessive we may charge the applicant a reasonable cost. Alternatively, we may refuse to meet the request in such circumstances. We may need to request specific information from the user, to help us confirm their identity and to guarantee their right to access information (or exercise any of the other rights). This is another security measure to ensure that personal information is not disclosed to people who do not have the right to receive it.

Security of personal data

Optimo Rent follows strict security procedures in the storage and disclosure of personal data, to protect them against accidental loss, destruction or damage. The data provided by users are protected with SSL (Secure Socket Layer) technology. SSL is the standard method of encrypting personal data allowing them to be securely transferred over Internet.

Optimo Rent may disclose users information to trusted third parties for the purposes set out in this Privacy Policy. Optimo Rent requires all third parties to adopt appropriate technical and operational security measures to protect personal data, which are in line with Italian and EU legislation on data protection regulations.

Cookie policy of Optimo Rent website

We invite you to read this page describing which kind of cookies is used by Optimo Rent website. This policy together with the <u>Privacy Policy</u> provides the instructions about the use of users' information.

Cookies: what are they and what are they used for

"Cookies" are a small piece of data sent from a website and stored in a user's computer or mobile device while the user is browsing that website or using its services. The purpose is acquiring and transferring information. Cookies are sent from the web server (where the website visited is being executed) to the browser you are using (Internet Explorer, Mozilla Firefox, Google Chrome, etc.) and then stored in your computer.

If you are interested in knowing more about cookies visit the page www.allaboutcookies.org
In general cookies can be used for many reasons, such as measuring the use of the site by the visitors, improving the page browsing, allowing personal preferences to be set on the website you are visiting, or also protecting the user's safety to protect the privacy of the users and display banner adverts that match the preferences of the visitors.

Kinds of cookies we use

While browsing the net some information is automatically registered such as: the name of your provider to access the Internet, the origin website, the pages visited, the duration of the visit, etc. Such information will be registered in a completely anonymous way.

Cookies used by our websites can be classified according to the purpose pursued as described below:

Statistic cookies

They are used for the statistic purpose of the Website and to monitor, always aggregated and never singularly, which pages of the Website and which Services are mainly appreciated by the Users.

These cookies are used only to help us to improve the functioning of our website and understand our users' interests.

Cookies of session

They are used only to allow access to some Services of the Website, are stored for the duration of the browsing session and then cancelled.

Google analytics

Istituto Marangoni website utilizes Google Analytics by Google Inc. for homepage management.

Google Analytics places cookies that generate information on the use of the website by the user. This information is nameless and gathered by Google anonymously. Google stores this

information in its servers in order to track and analyse the use of a website, release reports and statistics on the activities involving the use of Optimo Rent homepage.

Google may eventually transfer this information to other thirds if so requested pursuant to the applicable laws of the country, or by service providers acting on Google's account. Google will not associate the IP address of the user with any other data collected, processed, or stored by Google.

For more information visit http://www.google.it/intl/en_uk/analytics/learn/privacy.html Moreover, you can opt-out of cookies generated by Google Analytics at any time, by restricting, blocking, or erasing cookies from our website by installing an additional component to download from https://tools.google.com/dlpage/gaoptout?hl=en-GB

Third party cookies

Third party cookies are small data files placed on your computer by other companies providing for banner adverts and publicity from other web pages (retargeting) based on your surfing preferences. We have no control on third-party cookies and we cannot access neither the information nor the data they collect. This information is totally controlled by the third parties who generated the cookies pursuant to their privacy policies.

Third party cookies are subject to prior consent of the user. Please view the information on third party **cookies** available under the following links:

AdWords http://www.google.com/intl/en-GB/policies/technologies/ads/

The user's settings are saved in order to keep track of the way they get to the site and surf it. A cookie is placed on the computer of the user every time the latter clicks an advert. These cookies stay for 30 days and do not gather, nor monitor any information suitable to identify the reference user. You can deactivate the cookie generated by Google conversion tracking in the settings of your Internet browser.

To know more: https://support.google.com/adwords/answer/2407785?hl=en-GB&ref_topic=24937

Facebook https://en-gb.facebook.com/about/privacy/cookies

The cookies collect the contents and information you supply when using the Facebook services.

More information on the cookie Rules and Standards are available under the link https://en-gb.facebook.com/help/cookies/update

You can deactivate tracking cookies in the settings of your Internet browser.

ShareThis http://www.sharethis.com/legal/privacy/

ShareThis is a tool that allows users to share and suggest certain contents of a web page in the social networks. Third-party cookies may be placed on your computer while you surf a website, and they will collect information on your use of the site.

You can block the ShareThis cookies by clicking on the 'non tenere traccia' [do not keep track] button that shows in the bottom corner, on the right hand side of the ShareThis popup window that opens every time when you click a social icon.

Information on Behavioural Advertising and How to Protect your Privacy in the Internet

If you do not wish other companies to collect or use the information gathered on your web activities to provide you with more focused advertisement, you can opt-out by:

<u>European Digital Advertising Alliance</u> in Europe, <u>Digital Advertising Alliance</u> in the US, and <u>Digital Advertising Alliance of Canada</u> in Canada. Alternatively you can block it by changing the settings of your mobile device.

If you are in Europe, select your country from http://www.youronlinechoices.eu/ and check your preferences on online behavioural advertising. You can enable or disable all companies or change your settings for each individual company.

Icons of the Social Networks

Our website hosts some social buttons/widgets. These are special "buttons" with the logo of a social network (i.e. Facebook Twitter, You Tube, Google Plus, etc...) These "buttons" allow users' access or interaction with the socials by a simple "click." If you click the social buttons/widgets, the reference social will start collecting data on the user's visit. Except for socials, in which users are to freely decide on whether to share their surfing data with the selected social networks, Istituto Marangoni will share no information on users' surfing experiences or users' data relative to the decision of a user to activate any of the Social buttons/widgets. For more detailed information, please check-out the privacy policy of the various socials that you can access through our homepage using the social buttons.

The information gathered by Optimo Rent through the cookies will not be used for users' identification. Cookies are not used for any other application different from the afore mentioned ones.

Acceptance of this policy

Your decision to continue surfing the Internet will automatically involve your consent for this Cookie Policy and you accept the use of cookies in compliance with what is described in this page. If you decide not to accept it we invite you to set your web browser in a suitable way or not to use Optimo Rent website. We remind you that the deactivation of some cookies can affect your web browsing.

How to check and cancel cookies

Most internet browsers are set to accept cookies automatically.

At any moment, you can set your browser in order to accept every cookie, some of them, or refuse them, by disabling their use by the sites. In addition, you can set the browser preferences in order to be warned every time that a cookie is stored in the memory of your computer.

At the end of every browsing session, you can cancel the collected cookies from the hard disk. In order to eliminate the cookies installed in the cookie folder of the browser used, every browser shows different procedures to manage the settings.

By selecting the links below you can get specific instructions for some of the main browsers

Microsoft Windows Explorer

Google Chrome

Mozilla Firefox

Apple Safari