

PRIVACY POLICY

Your privacy is important to us. This privacy statement explains:

1. What personal data is collected by the owner of this web site or provided by you, through our interactions with you and your use of our web site (<https://myrentacar.me/>), apps and software
2. How your personal data will be used, where it is held, how long it will be kept and your rights.

Please read this privacy policy carefully.

DEFINITIONS AND INTERPRETATION

In this privacy, the following definitions are used:

Data controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.

Data processor, in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

“You”, “your” or “data subject” means:

- Visitors to our website
- Subscribers to any service we offer through our site
- Prospective or existing clients
- Our Partners, Suppliers and Car Owners

Data controller, **“we”**, **“us”** and **“our”** means:

Renot Software OU and its data processors;

Personal data means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people. The definition incorporates, where applicable, the definitions provided in the General Data Protection Regulation (EU 2016/679).

SENSITIVE PERSONAL DATA

The GDPR refers to sensitive personal data as “special category data”. Please see “Special category data”.

SPECIAL CATEGORY DATA

Means personal data consisting of information as to the racial or ethnic origin of the data subject, his political opinions, his religious beliefs or other beliefs of a similar nature, whether he is a member of a trade union, his physical or mental health or condition, his sexual life. The special category specifically includes genetic data, and biometric data where processed to uniquely identify an individual.

CRIMINAL OFFENCE DATA

Personal data relating to criminal convictions and offences.

WHO WE ARE (IDENTITY OF THE DATA CONTROLLER)

For the purpose of the General Data Protection Regulation the data controller is Renot Software OU with company registration number and the registered address at Kadaka tee 137-65, Mustamäe district, Tallinn city, Harju county, 12915 Estonia.

PERSONAL DATA WE MAY COLLECT FROM YOU

We may collect and process the following data and personal information about you:

PERSONAL DATA YOU PROVIDE US VOLUNTARILY

We collect the information provided by you to operate effectively and provide you the best experiences with our Website, products and services. You provide some of this information voluntarily by filling in the contact forms on our web site, creating an account at our Website or by corresponding with us by phone, e-mail or otherwise. This includes information you provide if you subscribe to any service we offer through our site, send us a query or feedback, sign up for information on events, upload a document with your enquiry, make a booking on our site, purchase goods via the Website, participate in discussion boards or other social media functions on our site, promotion or survey, contact us via chat or messenger, provide your postcode to help us to find our nearest branch to your location, or when you report a problem with our Website.

The information you may give us is Personally Identifiable Information (“PII”). When we refer to “PII” in this policy we mean information that identifies an individual or may with reasonable efforts cause the identification of an individual) may include your:

First name, Surname, address, e-mail address and phone number, your postcode or location, company name, pickup and return date and time, desired vehicle class and model, travel destination, lifestyle and social circumstances;

SPECIAL CATEGORY DATA

By the nature of our business and the purposes of processing the data, the services hereunder are not intended for large scale processing of special category data (please check the paragraph Definitions and interpretation). We do not process special category data on a regular basis and in if your request contains information about special needs related to a disability, we will obtain your consent to process special category data

during our later communication regarding your request. If this is not possible, or your sensitive personal data is not necessary for you to enter into a business relationship (oral or written contract) with us, we will destroy it and erase any copy in our possession.

CHILDREN

We do not sell any products or services for purchase by children. If you are under 18, you may use our Website only with the involvement of your holder of parental responsibility. We do not knowingly collect personal information from children below 18 without the consent of the child's holder of parental responsibility.

INFORMATION YOU PROVIDE ABOUT OTHERS

In providing personal data about other individuals (such as someone in whose name you are registering an account or subscribing to our marketing promotions), you represent that you have notified them of (i) the purposes for which information will be used (ii) the recipients of their personal data and (iii) how they can access and correct the information. You further represent that You have obtained all necessary consents from them.

INFORMATION WHICH MAY BE MADE AVAILABLE TO US, OR COLLECTED AUTOMATICALLY WITH THE USE OF COOKIES OR ANALYTIC TOOLS

We might get some information from our visitors by recording how they interact with our Website with the use of cookies, analytics tools or obtain data from third parties.

TECHNICAL INFORMATION, INCLUDING PERSONALLY IDENTIFIABLE INFORMATION:

- Might include your device and connectivity information such as IP (Internet Protocol) address, unique device identifiers (such as the IMEI for phones)

NON-PERSONALLY IDENTIFIABLE INFORMATION:

- Might include your configuration data such as browser type, version and language setting, time zone setting, browser plug-in types and versions

- Details of how you used our Website, such as your search queries. Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page:

- Log information, such as error reports, download errors, any problems you experience using our web site and any phone number used to call our customer service number.

We do not combine information collected automatically through cookies and analytics tools with other personally identifiable information you may have provided to us when you registered for our Products or submitted a form through our Website.

COOKIE POLICY

We use cookies, web beacons and other technologies to automatically collect certain types of information when you use our services, as well as through emails that we may exchange. The collection of this information allows us to customize your online experience; improve the performance, usability and effectiveness of our service; advertise and market our services; measure the effectiveness of our marketing activities; and generate and analyze statistics about your use of our Services.

A cookie is a small file, typically of letters and numbers, downloaded on to a device when the user accesses certain websites. Cookies allow a website to recognise a user's device.

We might use cookies to recognize you when you visit our site or use our Services, remember your preferences, and give you a personalized experience:

AUTHENTICATION COOKIES. If you're signed in to our Services, these cookies will help us show you the right information and personalize your experience.

SESSION COOKIES. These cookies store the ID of a user's session. The cookie is set when a user signs in and is used to restore the session without entering the personal data.

SECURITY COOKIES. We use cookies for our security features, and to help us detect malicious activity.

PREFERENCE, FEATURES AND SERVICES. These cookies help us to customise your preferences, such as which language you prefer and what your communications preferences are or to fill out forms on our faster.

PERFORMANCE, ANALYTICS AND RESEARCH. These cookies help us to analyse our web site performance. We use cookies to improve our products, features, and services, including to create logs and record when you access our site.

THIRD-PARTY COOKIES. We might use them for website analytics and advertising purposes, i.e. cookies which are set and can be accessed by servers respectively domains of our third-party providers.

We are using Google analytics cookies on this website which might register a unique ID that is used to generate statistical data on how the visitor uses the website, and cookies sending data to Google Analytics about the visitor's device and behaviour which track the visitor across devices and marketing channels.

WEB BEACONS

Web beacons consist of a small string of software code that represents a graphic image request on a page or email. There may or may not be a visible graphic image associated with the web beacon and often the image is designed to blend into the background of a page or email. Web beacons can be used for many purposes - including website traffic reporting, unique visitor counts, advertising auditing and reporting, and personalization.

We use the following session, permanent and third-party marketing cookies and tracking technologies, including cookies from our partners and service providers:

Name	Provider	Expire	Purpose
CookieConsent	myrentacar.me	1 year	Stores the user's cookie consent state for the current domain
PHPSESSID	myrentacar.me	Session	Preserves user session state across page requests.
collect	google-analytics.com	Session	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.
_ym_isad	myrentacar.me	Session	This cookie is used to determine if the visitor has any adblocker software in their browser – this information can be used to make website content inaccessible to visitors if the website is financed with third-party advertisement.
_ym_uid	myrentacar.me	1 year	This cookie is used to collect non-personal information on the visitor's website behavior and non-personal visitor statistics.
_ga	siteheart.com	2 years	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
_gat	siteheart.com	Session	Used by Google Analytics to throttle request rate
_gid	siteheart.com	Session	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
_csrf	heapanalytics.com	Session	Marketing cookie
_ym_metrika_enabled	myrentacar.me	Session	This cookie is used to collect data on the visitor's behavior on the website - this information can be used to assign the visitor to a

			visitor segment, based on common preferences.
i	yandex.ru	1 year	Marketing cookie
webvisor/14965885	yandex.ru	Session	Marketing cookie
yabs-sid	yandex.ru	Session	Marketing cookie
yandexuid	yandex.ru	1 year	Marketing cookie
yp	yandex.ru	10 years	Marketing cookie
_ym_d	myrentacar.me	1 year	Marketing cookie
_ym_metrika_enabled_14965885	myrentacar.me	Session	Marketing cookie
_ym_retryReqs	myrentacar.me	Persistent	Marketing cookie
_ym_visorc_14965885	myrentacar.me	Session	Marketing cookie
_ym14965885_lastHit	myrentacar.me	Persistent	Marketing cookie
_ym14965885_lsid	myrentacar.me	Persistent	Marketing cookie
_ym14965885_reqNum	myrentacar.me	Persistent	Marketing cookie
metrika_enabled	myrentacar.me	Session	Marketing cookie
shdata	myrentacar.me	Session	Marketing cookie

WHAT CAN YOU DO IF YOU DON'T WANT COOKIES AND ANALYTICS TO BE SET OR WANT THEM TO BE REMOVED

Most browsers accept cookies automatically, however some people prefer not to allow cookies. You may change the security settings of your web browser in order to stop your device receiving and storing cookies, to allow receiving and storing cookies from selected websites you trust, or to be notified before receiving cookies. You may also delete cookies stored in your browser at any time. Information stored in such cookies will be removed from your device. However, that these settings may have negative effects on the web sites usability.

Browser manufacturers usually provide help pages relating to cookie management in their products. Please see below for more information:

- Google: <https://support.google.com/chrome/answer/95647?hl=en-GB>
- Internet Explorer: <https://support.microsoft.com/en-us/help/260971/description-of-cookies>
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Safari (Desktop): https://support.apple.com/kb/PH5042?locale=en_US
- Safari (Mobile): <https://support.apple.com/en-us/HT201265>
- Android Browser: https://support.google.com/nexus/answer/54068?visit_id=1-636585517588941681-639659396&hl=en&rd=1
- Opera: <https://www.opera.com/help>
- Opera Mobile: <https://www.opera.com/help/mobile/android#privacy>

For other browsers, please consult the documentation that your browser manufacturer provides.

You may opt-out of third party cookies from Google Analytics on its website.

You can opt out of interest-based targeting provided by participating ad servers through the Digital Advertising Alliance (<http://youradchoices.com>). In addition, on your iPhone, iPad or Android, you can change your device settings to control whether you see online interest-based ads.

SOCIAL MEDIA FEATURES AND WIDGETS

Our Website might include certain Social Media features and widgets, such as “Facebook Pixel”. These Social Media Features may collect information such as your IP address or which page you are visiting on our Website, and may set a cookie to enable them to function properly. Social Media Features are either hosted by a third party or hosted directly on our Website. Please be aware that if you choose to interact or share any Personal Information via such widgets, you are in fact providing it to these third parties and not to us. Your interactions with these third parties are managed by these Social Media policies and not ours. For example, you will not be able to use the “Facebook Like” button if you are not logged in to your Facebook account. Once you use the button this will be associated with your Facebook history, but we will not process this information.

INFORMATION WE MIGHT OBTAIN FROM THIRD PARTIES

We might obtain some non-personally identifiable information from third parties. We protect data obtained from third parties according to the practices described in this statement, plus any additional restrictions imposed by the source of data.

We might insert advertising on our partner websites, social networks or Advertising networks who might categorize website visitors with similar characteristics or interests into non-personally identifiable data segments and offer these segments to their own clients, visitors and subscribers. For example, if a person expresses an interest in cryptocurrency or beauty products, they might see an advertising banner linking to similar service provider company web site.

We might obtain and record information that an ad was requested or shown, how many times, the target geography of the ad (which will not include an IP address or specific personally identifiable location and any user interactions with the ad or the page where the ad appears. This information is used for analysis, reporting and troubleshooting. We do not perform any visitors profiling activities.

WHERE DO WE STORE YOUR INFORMATION?

We take Client confidentiality and security very seriously. We are committed to protecting the Personal Data you share with us. We use a combination of industry-standard security technologies, procedures, and organizational measures to help protect your Personal Data from unauthorized access, use or disclosure.

The data processing consisting in hosting provider services (storage and maintenance of databases containing your personal data, protected by password) is performed on our behalf and under written confidentiality agreements inside European Union area by our authorized data processor Hetzner Online GmbH - an Internet hosting company and data center operator based in Gunzenhausen, Germany.

We also may keep some of your data at Amazon Web Services, Inc. ('AWS'). Amazon Web Services, Inc. ('AWS') is part of a global organisation with local operating companies in a number of countries worldwide. All information is stored on Amazon Web Services datacentres in Ireland.

TRUSTED PARTNERS (DATA PROCESSORS) WHO WORK ON OUR BEHALF UNDER CONFIDENTIALITY AGREEMENTS AND MIGHT STORE, MAINTAIN OR PROCESS YOUR DATA

We have partnered with a number of authorized service providers (data processors), whose services and solutions complement, facilitate and enhance our own under written confidentiality agreements that guarantees that the requirements of the GDPR will be met and the rights of data subjects are protected. Data processors only act on behalf of our documented instructions. They have direct responsibilities under the GDPR and may be subject to fines or other sanctions if they don't comply.

These might include communications and content delivery networks (CDNs), ticketing systems, online chat providers, web analytics, e-mail distribution and monitoring services, advertising networks, feedback analytics systems and our legal and financial advisors.

Such data processors may receive or otherwise have access to your identifiable or non-identifiable personal data, in its entirety or in part – depending on each of their particular roles and purposes in facilitating and enhancing our Services and business, and may only use it for such purposes. Under no circumstances may data processors will use the data for their own purposes.

The written agreements with the data processor guarantees that the requirements of the GDPR will be met and the rights of data subjects are protected. The data processor will only act on behalf of our documented instructions, have direct responsibilities under the GDPR and may be subject to fines or other sanctions if they don't comply.

Once this contract is concluded, data processor will return data to us or transmit to another processor appointed by us, and erase any copy in its possession. However, the processor may keep the data locked to address possible administrative or jurisdictional responsibilities.

Your personal data might be maintained, stored and processed at a destination inside the European Economic Area. The data processors include companies such as:

MailChimp, OmniDesk, Shoppilot, sitehart.com and others;

Once the data processing contracts are concluded, data processors will return data to us or transmit to another processor appointed by us, and erase any copy in its possession. However, the processors may keep the data locked to address possible administrative or jurisdictional responsibilities.

DATA RETENTION

Unless otherwise specified, where you have indicated to us that you are happy for us to send you the information about goods and services we offer and we feel may interest you or similar to those that you have already purchased or enquired about so, we assume you are happy for us to keep your collected personal data. We may retain your Personal Information (contact details) for as long as your User Account is active or as otherwise needed to provide you with information about our Services. As the data subject you have rights related to processing of your personal data and the option of withdrawing your consent to receive promotions at any time. Please see paragraph "Your rights".

If you and us enter in a contract, we might keep your data during the performance of the contract and as long as it is necessary as for our legitimate interests. Please see paragraph "Lawful basis and the purposes of the processing (Uses made of your personal information)".

LAWFUL BASIS AND THE USES MADE OF YOUR PERSONAL INFORMATION

We process all personal data lawfully, fairly and in a transparent manner. We use the data we collect for the following basic purposes, described in more detail below:

1. To take steps at the request of the data subject prior to entering into a business relationship (oral or written contract):

1.1 By contacting us by means specified in paragraph "Personal Data you provide us voluntarily", we assume that processing is necessary for the performance of a business relationship (oral or written contract) or in order to take steps prior to entering into a business relationship (oral or written contract), and therefore the lawful basis is Contract and our Legitimate interests.

1.2 We will use the provided information to operate effectively and do our best to respond to your enquiry. Once you enter into a business relationship (oral or written contract) with us, we will invoice our services consisting in car renting and offer you post-sales service and loyalty if required.

2. We might hold your information for as long as is necessary to comply with our and legal obligations and in accordance with our legitimate interests as a data controller after the contractual relationship between you and us elapses. The lawful basis for such retention is Legitimate interests and Legal obligation. As the data subject you have rights related to maintenance, storage and processing of your personal data. Please see paragraph "Your rights".

3. To send you communications, including promotional communications and advertising with your explicit consent or allow you to participate in interactive features of our service, when you choose to do so. The lawful basis for such processing is Consent.

3.1 If you wish not to receive such promotional e-mails, you may withdraw your consent at any time by contacting us as described in paragraph “Your rights” or follow the “unsubscribe” or instructions contained in the promotional communications you receive.

4. Website improvement

We might use your automatically collected data such as IP address and browser data for our Website improvement, such as:

4.1 To administer our site and for internal operations, including data security, troubleshooting, testing, statistical and survey purposes;

4.2 To ensure that content from our site is presented in the most effective manner for you and for your device. The lawful basis for such processing is Legitimate interests.

DISCLOSURE OF INFORMATION TO THIRD PARTIES

We do not rent, sell, or share personal information about you with other people or non-affiliated companies without your consent except to provide products or services you've requested, when we have your permission, or under the following circumstances:

1. We provide the information to trusted partners who provide us services under confidentiality agreements, specified in Paragraph “Trusted partners (data processors) who work on our behalf under confidentiality agreements and might store, maintain or process your data. These companies do not have any independent right to share this information.
2. We might share your aggregated statistical non-personally identifiable data with our partners as described in the section Cookie policy, with companies such as Admitad and TravelPayouts.
3. We may disclose your information to third parties when we reasonably believe we are obligated to do so by law, and in order to investigate, prevent, or take action regarding suspected or actual prohibited activities, including but not limited to, fraud and situations involving potential threats to the physical safety of any person.

4. In the event we are acquired by or merged with a third party entity or undergo another change of control, we reserve the right to transfer information, including any PII and non-PII, to a successor entity. In this event, we will notify you by electronic means before information about you is transferred and becomes subject to a different privacy policy.

YOUR RIGHTS

You have the following rights in accordance with the General Data Protection Regulation

1. **THE RIGHT TO BE INFORMED.** In this privacy statement we supply you detailed information related to your personal data storage, maintenance and processing.
2. **THE RIGHT TO ACCESS INFORMATION HELD ABOUT YOU.**
3. **THE RIGHT TO RECTIFY YOUR PERSONAL DATA** if it is inaccurate, incomplete or out-of-date.
4. **THE RIGHT TO ERASURE (DELETE OR REMOVE) YOUR PERSONAL DATA.**
5. **THE RIGHT TO RESTRICT (BLOCK) PROCESSING.** When processing is restricted, we will store your personal data, but not further process it.
6. **THE RIGHT TO DATA PORTABILITY** is your right to receive the personal data which you have given to us, in a structured, commonly used and machine-readable format and the right to transmit that data to another controller from the current controller applicable if: The processing is based on consent or on a contract, and the processing is carried out by automated means.
7. **RIGHTS RELATED TO AUTOMATED DECISION MAKING INCLUDING PROFILING.**
8. **THE RIGHT TO WITHDRAW YOUR CONSENT OR OBJECT TO DIRECT MARKETING AND OTHER TYPES OF PROCESSING IF APPLICABLE.**

You can exercise your rights by contacting us at hello@myrentacar.com

THE RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

You have The right to lodge a complaint with a supervisory authority if you have a concern about our information rights practices.