PRIVACY POLICY

VIATOR d.o.o., with its registered office at Kralja Držislava 6, Split, OIB (PIN): 64731717121, is a company registered for the rental and sale of cars and light motor vehicles. While carrying out its registered activities, VIATOR d.o.o. collects and processes its clients' personal data, in full compliance with the relevant legal regulations.

1. What is personal data?

Personal data is any information or combination of information that can be used to identify a person. The personal data that VIATOR d.o.o. collects and processes include at least your basic personal details (name, surname, address, contact information, OIB (PIN), date of birth, sex, identification document (if necessary), and IP address). This data is also necessary to facilitate communication with you during our business relationship and to provide you with important information.

2. Who processes your personal data?

VIATOR d.o.o. collects and processes your personal data and is responsible for ensuring that the data is processed and stored in compliance with applicable European and national data protection regulations. In this regard, VIATOR d.o.o. is considered the controller for the processing of personal data.

3. How do we collect and use your personal data?

Personal data is primarily collected directly from you when we receive inquiries about our services, for instance, when entering into or executing a rental agreement, reporting damages, or handling similar requests. When you provide data through third parties, such as agencies, we consider it as having been received directly from you. We may also collect your data from publicly available sources and documents, as well as from third parties, including our business partners, national authorities, insurance companies, lawyers, or financial institutions.

Additionally, we collect your data through our websites (<u>www.viator-auto.hr</u>, <u>www.rentacarlastminute.hr</u>, and <u>www.viatordrive.hr</u>), namely when you visit these sites and consent to data collection via certain types of cookies.

4. What are the legal bases and purposes for collecting and processing your personal data?

VIATOR d.o.o. collects and processes your personal data for purposes permitted by law, mainly to facilitate the conclusion and execution of vehicle rental agreements and associated services, namely in accordance with applicable regulations. We also collect your data to fulfill our legal obligations and/or based on our legitimate interest. For certain processing purposes, we will additionally request your consent.

- We collect the personal data required for entering into a rental agreement as early as the quote creation stage, when you are viewed as a prospective vehicle user. During the contractual relationship, we collect your personal data to enforce the rights and obligations arising from the rental agreement, whether you are the renter, user, driver, or a third party.
- We also process your personal data to comply with our legal obligations, particularly those related to providing accurate information to competent authorities in cases of misdemeanors or criminal offenses, handling complaints and grievances regarding the conclusion and execution of the rental

agreement and/or issued invoices, submitting periodic financial reports to competent authorities for public disclosure, and fulfilling obligations under the Act on the Prevention of Money Laundering and Terrorist Financing.

- We may process your personal data if such processing is necessary for our legitimate interests, namely unless your interests or fundamental rights and freedoms, which require the protection of personal data override those interests. If you object to such processing, we will no longer process your data unless we demonstrate compelling legitimate grounds that outweigh your interests, rights, and freedoms.
- Your personal data is also collected based on your consent. By signing a declaration granting us consent to collect and process your personal data, you agree that VIATOR d.o.o. may collect and use such data for the provision of services, for securing payments, the creation of a user database, the protection of company property, as well as the protection of the safety and security of its users and employees. Beyond these purposes, if you have given your consent in the consent statement, VIATOR d.o.o. may also use your personal data to contact you, both for marketing purposes and to improve its services. You may withdraw your declaration of consent at any time. Withdrawing your declaration of consent for communication purposes alone does not influence the conclusion or performance of a rental agreement. It simply means that your contact details will be deleted from our marketing and service enhancement lists.
- Additionally, we collect your personal data through our websites (www.viator-auto.hr, www.rentacarlastminute.hr, and www.viatordrive.hr), namely when you visit these sites and consent to data collection via certain types of cookies. Such data may lead to your identification, but we do not use it for that purpose. We periodically use it for statistical purposes while ensuring the anonymization of every user, so individual identification is not possible. By entering your personal data in the designated fields on our websites, you confirm that you have voluntarily provided your personal information to VIATOR d.o.o. as the data controller and authorize its use for the intended purpose. For more information, please refer to our Cookie Policy.
- We also collect and process your personal data through video surveillance to ensure the safety of people and property. Video surveillance footage may be provided to competent authorities (police, courts) upon request, if required for legal procedures under specific regulations.
- On our website, we use the Google reCAPTCHA service to protect the site from unwanted automated activities (bots) and misuse. This service helps distinguish real users from automated programs and enhances the security of our website. Google reCAPTCHA may collect certain personal data, including IP address, device information, and user interactions with our website. This data is sent to Google and processed in accordance with their privacy policies. For more information, you can refer to the following links: https://policies.google.com/privacy.

5. Personal data security

VIATOR d.o.o. collects and processes personal data in a way that ensures appropriate security and confidentiality in its processing, while enabling the effective application of data protection principles, minimizing the amount of data collected, and limiting the scope of its processing, retention periods, and its availability.

VIATOR d.o.o. takes all appropriate technical and organizational protective measures to prevent accidental or unlawful destruction, loss, alteration, unauthorized use, disclosure, inspection, or access to data.

By signing a confidentiality agreement, all employees of VIATOR d.o.o. undertake to safeguard personal data.

6. Who will have access to your personal data?

VIATOR d.o.o. ensures that your personal data is collected and processed in a manner consistent with the legal grounds and purposes of personal data collection. To achieve these purposes, VIATOR d.o.o. may, in certain cases, need to make your personal data available to the following individuals: national authorities, in accordance with our legal obligations, providers of IT solutions, marketing and accounting service providers, and other business partners.

All of these individuals (personal data processors) process your personal data according to our instructions, in line with a specific Data Processing Agreement we have concluded with them, while respecting the appropriate technical and organizational measures, as well as applicable personal data protection regulations, namely to ensure the protection of your rights.

An exception to this includes national and public authorities that process data in accordance with regulations, as well as cases where these entities apply specific processing rules based on the regulations that apply to them and such processing.

In no case will VIATOR d.o.o. make your personal data available to entities without authorization to process it.

7. What are your rights regarding the protection of your personal data and how can you exercise them?

When provided by regulations, you have the following rights:

- the right to access personal data related to you and the information about its processing;
- the right to **correct personal data** to ensure that the information held by VIATOR d.o.o. is accurate, correct, and up to date;
- the right to **delete personal data** if such data is no longer required for the legitimate purposes of processing and if no legal provision prohibits its deletion;
- the right to **restrict the processing of personal data** in cases specified by applicable data protection laws;
- the right to transfer personal data to another controller for the processing of personal data;
- The right to **lodge an objection** with VIATOR d.o.o. or the relevant supervisory authority;
- The right to **withdraw consent** at any time, namely if we process personal data based on your consent.

8. How can you object to the processing of personal data?

In specific circumstances, where legally allowed, you have the right to object to the processing of personal data or request to halt its processing, such as when the processing is based on direct marketing. As soon as we receive your request to halt processing, we will cease processing your personal data unless processing is permitted under the relevant laws and regulations. You can send your request to the email address gdpr@rentacarlastminute.hr.

9. How long does VIATOR d.o.o. keep your personal data?

VIATOR d.o.o. retains your data for periods determined by the purpose of processing, regulations that define data retention periods, regulations defining the statute of limitations for claims, and internal policies that specify data retention periods, while ensuring the application of appropriate technical and organizational measures to protect your rights and freedoms.

10. Personal Data Protection Officer

If you have any questions regarding the collection and processing of your personal data, or the exercise of your data protection rights, you can contact the Personal Data Protection Officer at the email address gdpr@rentacarlastminute.hr or by phone at +385 21 444 228.

11. Changes to the personal data protection rules

VIATOR d.o.o. regularly updates its Privacy Policy in accordance with changes and updates based on applicable regulations and ensures that the most recent version of the Privacy Policy is available on the website www.rentacarlastminute.hr. In the event of a significant change to the Privacy Policy that may materially affect your rights, freedoms, or interests, you will be directly notified.