

PRIVACY POLICY OF PANEK UAB

GENERAL INFORMATION

This Privacy Policy of UAB "PANEK" (hereinafter referred to as the "Policy") contains information about the methods and principles of processing personal data in connection with the services provided by "PANEK" UAB.

PANEK UAB pays particular attention to respecting the privacy of all individuals, and therefore the personal data of users of our services and the personal data of other persons are used only for the purposes for which they were collected and for a period of time no longer than is necessary to achieve those purposes. Please read this Policy carefully.

Your personal data is necessary for us to be able to rent you a car or to provide other services to you, and if you do not submit it, we will not be able to provide you with services. This Policy also applies to your personal information that we collect when you use our website.

In processing your data, we comply with the European Union's General Data Protection Regulation (EU) 2016/679 (hereinafter referred to as "**GDPR**") and other legislation.

Data Controller

The controller of your personal data is UAB "PANEK", legal entity code 304445214, registered at Laisvės ave. 125, Vilnius, e-mail address office@panek.lt.

Who do we get your data from?

We receive your personal data directly from you, either verbally when you come to conclude a car rental contract, in writing (by e-mail) or when you make a car reservation on our website.

If you have booked your car through a travel agency, broker, intermediary or reservation system, we obtain the data necessary for the conclusion of the contract (name, surname, telephone number, address, email address, payment details, card details, age, driving record, etc.) from these third parties.

We receive data about your offences or incidents (where damage is caused) from law enforcement authorities (police, customs, etc.) and other entities (e. g. entities administering parking charges), as well as from GPS devices installed in cars (when you are speeding, when you are travelling outside Lithuania, etc.).

If your employer or another company representing you wants to rent you a car, your personal data will be provided to us by these third parties.

What type of personal data we process

We may process the following data about you in the course of providing our services:

- Name, surname, date of birth, address, passport/ID card number, personal code, driving licence number, driving licence expiry date, length of driving experience, telephone number, email address, credit card number, credit card expiry date;
- contractual data, which may include rental information (car category, pick-up and return time, pick-up and return point, extras/services ordered), rental contract number, reservation number, registration number of the rented car, information on customer loyalty and partner programmes;
- special categories of data. In the event of an accident or damage to a car or similar incidents, we process data relating to the course of events and damage caused. Such data may be

provided by customers, passengers or the injured party. The data processed in these circumstances may include data relating to health conditions, such as information on injuries, blood alcohol content, driving under the influence of drugs and similar data.

- GPS location data. All our rental cars are equipped with a GPS location system, so we keep track of the car's movements and location data;
- video footage. We carry out video surveillance at locations where there are information notices about video recording.

For what purpose and on what legal basis we process your data

When you come to our car rental outlet or reserve a car through our rental agents and our website, we process your personal data in order to be able to provide our services to you (to rent a vehicle, to fulfil the rental contract, to provide additional services of your choice, to resolve a dispute).

For what purpose do we process your data	What data do we process	What is the legal purpose of the processing	How long will we process for
For the purpose of concluding and executing the rental contract	Name and surname Telephone number Email address Passport/ID card No Personal code Driving licence number, expiry date, driving record Bank card number, expiry date	Pursuant to Article 6(b) of the GDPR - performance of the contract	As long as the contract is in force and for 10 years after the expiry of the contract (general limitation period)
For the fulfilment of legal obligations that Panek UAB has to comply with arising from other legislation (provision of information to the authorities entitled to request it, compliance with court decisions, cooperation with insurers, etc.)	Name and surname Telephone number E-mail address Passport/ID card No Personal code Driving licence number, expiry date, driving record	Pursuant to Article 6(1)(c) GDPR - legal obligation	As long as the contract is in force and for 10 years after the expiry of the contract (general limitation period)
For the purpose of securing ownership, in particular to locate the car in the event of loss, misappropriation or theft, and to check that you are properly implementing the rental agreement	Driving data (engine temperature, speed and speeding, speed limits, use of the handbrake, car load level, battery voltage, open doors, fuel level, overloading, stops, etc.), date of use, driving time, distance, GPS/CAN location, driving route.	Pursuant to Article 6(1)(f) of the GDPR - legitimate interest	For a period of 3 months after the termination of the contract or pending the settlement of a dispute
To bring, pursue or defend legal claims (against insurers, other third parties) if the accident caused damage to your health or if you were under the	Data about your injuries, health condition (including alcohol/drug consumption during the use of the car)	Pursuant to Article 9(2)(f) of the GDPR - for the purpose of asserting, enforcing or defending a claim	For a period of 3 months after the termination of the contract or pending the settlement of a dispute

influence of alcohol or drugs			
For the purpose of performance of insurance contracts	If you have opted for insurance, we will forward to insurers: your name and surname Your telephone number Your email address Passport/ID card No Personal code Driving licence number, expiry date	Pursuant to Article 6(b) of the GDPR - performance of the contract	As long as the contract is in force and for 10 years after the expiry of the contract (general limitation period)
For the protection of property, employees and customers, for the resolution of potential disputes	Visual data	Pursuant to Article 6(1)(f) of the GDPR - legitimate interest	2 weeks
Creating and managing an online customer account on the company's website	Name, surname, telephone number, email address	Pursuant to Article 6(1)(a) of the GDPR - Consent	For 3 years from the end of the contractual relationship or until confirmation of the deletion of your account, if you so request.

If during the rental period you are involved in an accident, suffer damage, or the vehicle is damaged or stolen, or suffers a mechanical breakdown, we will process information about the incident, including your report of the incident, and any reports from the police or other third parties, including details of the persons involved, the nature of the personal injuries, and/or the damage to the vehicle. We will use this information for our legitimate interests (for example, to cover any loss or damage to the vehicle); to comply with our legal obligations (for example, to provide the relevant authorities with the necessary incident reports); and to formulate, enforce and defend any legal claims in relation to such incident.

During your rental period, we will collect information about where and when you rented the vehicle, where and when you returned it, as well as insurance preferences, fuel consumption, mileage, accident facts and other information related to the vehicle and your use of it. This information is necessary to enable us to provide you with the services you have requested, either contractually or for our legitimate business interests (for example, to monitor the use of our vehicles). All of our company vehicles are equipped with location tracking equipment so that your location and route are recorded when you use the vehicle.

We will also collect information about any speeding, parking or other traffic-related fines imposed on you during the rental period, or traffic offences committed by you, when such information is provided to us by any law enforcement authority. We will use such information to resolve the payment of a fine or to resolve an offence under a vehicle rental agreement.

Who will we pass your data to?

Your personal data may be transferred to the following recipients or categories of recipients, depending on the situation and the services you use.

Data recipient or category	Purpose of transfer and disclosure	Legal basis for transfer
Travel agents or service brokers, intermediaries	<ul style="list-style-type: none"> - to perform our contract concluded with you when you use the services of these third parties or order our services from these third parties; - to make and confirm your rental reservation, to perform the contract; - Process payments, debits and refunds; - Provide assistance and roadside assistance services; - Provide insurance services; - Provide any other services requested by you. 	<ul style="list-style-type: none"> - Execution of the contract concluded with you; - The legitimate interests of our company.
Car Rental Booking System Administrators	<ul style="list-style-type: none"> - To perform our contract concluded with you when you use the booking systems; - To make and confirm your rental reservation, to fulfil your contract; - To process payments, deductions and refunds; - To provide assistance and roadside assistance services; - Provide insurance services; - Provide other services as requested by you. 	<ul style="list-style-type: none"> - Execution of the contract concluded with you; - The legitimate interests of our company.
Credit card issuers	<ul style="list-style-type: none"> - To receive payment from you or to obtain security for a contract; - To process payments, debits and refunds; - To verify the authenticity of the data; 	<ul style="list-style-type: none"> - Execution of the contract concluded with you; - The legitimate interests of our company.
IT service providers, including IT platform providers	<ul style="list-style-type: none"> - to perform our contract concluded with you and to carry out our business properly; - To carry out maintenance of our IT systems and infrastructure; - To obtain data processing services; 	<ul style="list-style-type: none"> - The legitimate interests of our company.
Government and law enforcement authorities	<ul style="list-style-type: none"> - to meet our legal obligations; - to check your driving licence and make sure you meet our driving criteria; - At the request of these authorities where disclosure is necessary or permitted by law; - To take action in relation to illegal activities, traffic offences or breach of terms of service; - In other cases required or permitted by law 	<ul style="list-style-type: none"> - Legal requirements; - The legitimate interests of our company.
Insurance companies, persons dealing with claims	<ul style="list-style-type: none"> - To provide you the services you bought with the rental (insurance services); - To provide the insurance service you have requested and to provide the service related to it; 	<ul style="list-style-type: none"> - Execution of the contract concluded with you;

	- To deal with any claims that may be made under the relevant insurance policy.	- The legitimate interests of our company.
Professional advisors, including legal and financial advisors	- Risk management, obtaining advice, settling claims; - Legal claims handling, legal assistance, dispute resolution	- The legitimate interests.
Other service providers, to the extent reasonably necessary to provide specific services (e.g. postal service providers, couriers) or to ensure business continuity (e.g. accounting service providers, debt collection service providers)	- Receipt and performance of specific services; - Business continuity and assurance	- Legal requirements; - The legitimate interests.

What rights can you exercise?

You have the following rights under the GDPR:

- To receive information about the processing of your personal data.
- To have access to your personal data.
- To withdraw your consent to the processing of your personal data.
- To request rectification of inaccurate or incomplete personal data.
- Request erasure (right to be forgotten) of personal data relating to the data subject if this can be justified on one of the grounds set out in Article 17(1) GDPR.
- To request the restriction of the processing of your personal data in one of the cases provided for in Article 18(1) of the GDPR.
- The right to data portability.
- To object to the processing of personal data concerning you.
- File a complaint with a supervisory authority.
- The right to obtain compensation for improper processing of personal data.

You can exercise your rights by contacting us at office@panek.lt. You can also lodge a complaint with the supervisory authority, the State Data Protection Inspectorate (contact details at www.vdai.lrv.lt if you believe that we are processing your personal data in breach of applicable law).

If you intend to exercise your rights, we may ask you for identification data, such as your surname, names, driver's ID and any information that identifies you (e. g. the place and date of your last vehicle rental). We also ask you to provide us with the email address or physical address where you would like a reply to be sent.

This privacy policy was updated on 05/08/2022.