

App Privacy Policy

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In the following we would like to inform you about the types of data processed by SIXT and about the purposes of such data processing. We would also like to inform you about important legal aspects of data protection, such as your rights. You are not contractually or legally obliged to provide us with your personal data. Please note, however, that you cannot enter into a vehicle rental contract with us if we are not permitted to process your data for the following purposes.

This Privacy Policy applies to the processing of personal data in the [SIXT app](#), which is currently offered for iOS and Android (hereinafter also referred to as the App or our App). Please note that for data processing of our SIXT branches or our websites, separate privacy policies with different responsibilities may apply. This applies in particular to rental processes, for which the respective companies of the SIXT group as well as SIXT franchisees and cooperation country companies are regularly responsible. Your attention will be drawn to such separate notices at the time this data is obtained.

A: Data controller, contract details of the data protection officer

The party responsible for providing the App and for processing your data in connection therewith (controller) is SIXT GmbH & Co. Autovermietung KG, Zugspitzstraße 1, DE 82049 Pullach (hereinafter also referred to as SIXT). If you have any questions regarding data protection, please address your query to the following e-mail address: dataprotection@sixt.com

You can also contact our data protection officer by writing to the above-stated addresses (reference: Data Protection Officer).

B: Categories of personal data

The following categories of personal data may be processed by us in connection with our services:

- Master data: first name, surname, gender, date of birth, address (private and/or business), Password, customer number
- Communication data: telephone number, e-mail address (private and/or business in each case), fax number if applicable, third party phone numbers, communication content (in particular from e-mails)
- Contract data: driver's licence data, ID card and passport data, a selfie taken using the camera on your smartphone/tablet, vehicle categories, pick-up and return branch, booked extras/services, reservation and rental contract number, self-generated PIN, licence plate of your rented vehicle, result of the credit check, nature of a complaint
- Finance data: credit card data, account and bank details
- Voluntary data: These are personal data that you provide to us on a voluntary basis, without us having explicitly requested them, and include information such as your preferences with regard to the vehicle's equipment and category or answer to a survey
- Location data: data that reveal the location of your device
- Telematics data (for connected vehicles): e.g. Bluetooth token, GSM trigger, mileage, fuel tank volumes, vehicle location data, vehicle events

C: The legal basis for data processing at SIXT

Art. 6 (1) sentence 1 point a) of the General Data Protection Regulation (GDPR): Pursuant to this provision, the processing of your personal data is lawful if and to the extent that you have given your consent to such processing.

Art. 6 (1) sentence 1 point b) GDPR: Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract (e.g. when making the vehicle reservation).

Art. 6 (1) sentence 1 point c) GDPR: Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for compliance with a legal obligation to which SIXT is subject.

Art. 6 (1) sentence 1 point f) GDPR: Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for the purposes of the legitimate interests pursued by the controller, i.e., SIXT, or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, i.e., you yourself.

Art. 9 (2) point f) GDPR: Pursuant to this provision, certain special categories of personal data can be processed if such processing is necessary for the establishment, exercise or defence of legal claims. These special categories of personal data include the health data of the data subjects.

D: The purposes of data processing at SIXT

1. Downloading, installing and generally using the SIXT App

Purposes of data processing

In order to download and install our App from an app store (e.g. Google Play Store or Apple App Store), you must first register a user account with the app store provider and conclude the corresponding user agreement with that store. We have no influence on this process and we are not party to such a user agreement. When downloading and installing the App, the required information will be transmitted to the relevant app store, including your user name, your e-mail address and the customer ID of your account, the time of download and the unique ID of your device. We have no influence on this data collection and do not assume any responsibility in this respect. We only process the data thus provided to the extent that this is required for downloading and installing the App on your mobile device (e.g. smartphone, tablet).

As a user of the SIXT App, you can retrieve information on our products and offers. When logged in, you can make reservations for rental cars and other mobility offerings and conclude the relevant contracts (for more information, refer to Reserving vehicles, Renting vehicles). Furthermore, you can view active and past bookings, download invoices and manage your personal data (e.g. e-mail address, telephone number and address). In this context, we primarily process your master data, communication data, contract data and financial data. If you do not wish to use the functions available to logged in users or if your device is used by third parties and/or there is a risk of third parties gaining access without authorisation, you may log out at any time (within the App, refer to → Account, Logout), ensuring that third parties cannot access the personal data in your account.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR

2. Setting up a SIXT account

Purposes of data processing

You may set up a SIXT account via our SIXT App or website to avoid having to input data again when making further reservations/rentals and to enjoy other benefits. In order to use some of our digital products (SIXT share and SIXT Fastlane), however, it is mandatory you set up a SIXT account. To set up a SIXT account, we need your master data and communication data.

To ensure that you only use a validated SIXT account, we regularly check our customer databases. If several SIXT accounts have been created for or by you, they can be merged into a single SIXT account.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b), f) GDPR

Our legitimate interest in processing your personal data when merging SIXT accounts is to optimise our customer database by preventing unnecessary duplication in storing the data..

3. Validation of identity and driver's license

Purposes of data processing

We check your identity and your driver's license within the SIXT app through a photo identification process. To this end, we process your master data, contract data (driver's license data and photo/selfie) as well as special data categories (biometric data), which is done by comparing photos/selfies with the person. We use a multi-stage process that consists of checking the person and checking the documents. Checking the person includes the creation of a photo/selfie and ensuring that a human being is actually using the device (so-called "liveness" check). For the liveness check, a video is created in which you move your head back and forth, for example, to show that you are actually in front of the end device. Checking the documents includes checking the security features (e.g. holograms) in order to rule out the use of forged documents. In order to ensure that the person who is being checked has a valid driver's license and matches the person on the identification documents, a comparison is made with the aid of biometric features. Checking people and documents requires that we gain access to the microphone and camera of your device. You can deactivate these authorisations at any time (for more information, refer to → E: Requested permissions). Once you have been validated, we delete the copy of your driver's license and ID card as well as your selfie at the latest within 30 days. The information that you hold a driver's licence will be stored in your SIXT account for a maximum of six years and regularly reviewed.

Legal basis of the above processing

Art. 6 (1) sentence 1 point a), c) GDPR in connection with Section 21 of the Road Traffic Act (StVG)

Recipients of your data

For the above-mentioned purposes, we transmit your data to a service provider to validate your identity and driver's licence.

4. Reserving vehicles

Purposes of data processing

If you would like to rent a vehicle, you can make a reservation in advance by using our SIXT App, website or over the phone. In this context, we process your master data, communication data and contract data, as well as your financial data, where applicable. We process your location data in order to be able to display your nearest SIXT branch in the SIXT App, provided you have given consent for your location data to be used. You have the option of deactivating access to your location at any time (for more information, refer to → E: Requested permissions).

If you book your vehicle via travel agencies, online travel agencies or other agents, then your master data, communication data, rental information and, if applicable, financial information, will be transferred to us by our partners.

SIXT share vehicles can only be reserved using the SIXT App. In this context, we process your master data, communication data, financial data, contract data and your location data. We process your location data in order to be able to display the SIXT share vehicles nearest to your location, provided you have enabled this function. Here you have also the option of deactivating access to your location at any time (for more information, refer to → E: Requested permissions). Choosing not to activate your location data may result in some functions not working.

We use financial service providers to process payment transactions (including security deposits for credit cards). When carrying out transactions, in addition to the data mentioned above data to determine the user's device can be processed in order to secure the payment transactions and comply with regulatory requirements (e.g. regarding strong authentication during payment transactions).

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR if consent is given.

Art. 6 (1) sentence 1 point b) GDPR for data processing for reservation of vehicles including payment processing and customer service.

Art. 6 (1) sentence 1 point c) GDPR for data processing for the purpose of compliance with regulatory requirements for payment transactions and retention periods under commercial and tax law.

We use financial service providers to process payment transactions (including the deposit of security deposits for credit cards). As part of the processing, data to determine the terminal device used by the user may also be processed in addition to the data mentioned above in order to secure the payment transactions and comply with regulatory requirements (e.g., for strong authentication during payment transactions).

Recipients of your data

We disclose your data to the following recipients for the aforementioned purposes: IT service providers, call centres, collection companies, financial services providers, credit agencies, SIXT group companies, cooperation and agency partners and franchise partners.

As part of our measures to prevent fraud, we also transmit – in situations where third parties have been, or are at risk of being, defrauded – personal data to such third parties having suffered, or at risk of, fraud.

5. Renting vehicles

Purposes of data processing

We process your master data, communication data, contract data, financial data and any data you have provided voluntarily to facilitate the conclusion and performance of your rental contract.

We moreover use the master data, communication data and contract data for customer relations purposes, for example to handle any complaints or changes of reservation that you contact us about.

We also use your master data and contract data for purposes of settling accounts (e.g. commissions and sales processing) with, for example, travel agencies, other agencies, franchise partners and cooperation partners. In order to be able to fulfil your reservation request, we transfer your data to partner companies in the event that we do not have the requested vehicle or vehicle type available.

We are furthermore legally obliged – for purposes of preventing and investigating criminal offences – to compare your master and communication data with official perpetrator lists provided to us. Such comparisons also serve to ward off dangers and to facilitate prosecution by the state authorities.

We use financial service providers to process payment transactions (including security deposits for credit cards). When carrying out transactions, in addition to the data mentioned above data to determine the user's device can be processed in order to secure the payment transactions and comply with regulatory requirements (e.g. regarding strong authentication during payment transactions).

We furthermore use your data for your and our security, for example to avoid payment defaults and to prevent property offences (in particular fraud, theft, embezzlement; cf. → Fraud prevention).

SIXT reserves the right not to enter into rental contracts with persons who have shown non-payment, breach of contract or law or improper behaviour towards customers or employees. For this purpose, we process personal data in order to exercise our right to freedom of contract. For this purpose we process your master data and communication data.

Once the rights and obligations under the rental contract have been fulfilled by both parties, your master, payment and contract data will continue to be stored until the mandatory retention periods as stipulated by the legislature or regulators under the German Commercial Code, Tax Code and Money Laundering Act, have expired (normally between six and ten years).

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR applies to the processing of data to the extent required to conclude and perform rental contracts including payment processing and customer service.

Art. 6 (1) sentence 1 point c) GDPR applies to the processing of data to the extent required to detect, prevent and investigate criminal offences, to comply with regulatory requirements for payment transactions, to examine and store driver's licence data, and to comply with retention periods under commercial and tax law.

Art. 6 (1) sentence 1 point f) GDPR applies to the processing of data to the extent required to settle accounts vis-à-vis third parties, to assert our own claims, and to mitigate risks and prevent fraud.

Our legitimate interests in using your personal data to improve our services and customer services lie in the fact that we want to offer you the best possible services and to sustainably improve customer satisfaction.

To the extent that data processing is required to perform analyses with a view to preventing damage to our company and our vehicles, our legitimate interests lie in maintaining security for costs and preventing economic disadvantages such as those arising from non-payment or the loss of our vehicles.

Recipients of your data

We disclose your data to the following recipients for the aforementioned purposes: IT service providers, call centres, collection companies, financial services providers, credit agencies, SIXT group companies, cooperation and agency partners and franchise partners.

As part of our measures to prevent fraud, we also transmit – in situations where third parties have been, or are at risk of being, defrauded – personal data to such third parties having suffered, or at risk of, fraud.

6. Carrying out the rental contract when renting via the SIXT App

6.1. Unlocking vehicles via the SIXT App

Purposes of data processing

You need to unlock our vehicles via the SIXT App in order to carry out the rental contract for digital products (SIXT share and SIXT Fastlane) This is done by entering your self-generated PIN and activating the Bluetooth function of your smartphone or via Global System for Mobile Communication (GSM) together with your location data, provided you have enabled this function (for more information, refer to → E: Requested permissions). You have the option of deactivating access to your location or the Bluetooth function at any time. Choosing not to activate your location data or Bluetooth may result in some functions not working. We require your master data, contract data and telematics data for processing purposes.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) and b) GDPR.

6.2. Notification of locking and unlocking errors in the SIXT App

Purposes of data processing

When using the SIXT App to lock and unlock vehicles, any errors in this process, e.g. a window being left open before returning the vehicle, are displayed and must then be remedied. In this context, we need your contract data and telematics data.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) and f) GDPR.

Our legitimate interest in using your personal data in this type of processing is to prevent property offences in respect of our vehicle fleet and to protect our contractual and non-contractual rights.

6.3. Commencing a rental via the SIXT App

Purposes of data processing

When you initiate a rental through the SIXT App (by confirming the corresponding buttons), we will process your master data, contract data and telematics data in order to prepare the contract documents and to draw up the correct bill and accounts.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

6.4. Digital parking with SIXT share

Purposes of data processing

When you use SIXT share, we will cover the parking costs within the business area in accordance with the General Terms and Conditions of Rental of SIXT share. In this context, we process your contract data and telematics data..

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) and f) GDPR.

Our legitimate interest in using your personal data in this type of processing is to ensure that our vehicles are legally parked in contractual territories.

6.5. Digital payment at partner filling stations

Purposes of data processing

With SIXT share, you can fill up the vehicle yourself at partner filling stations and approve the fuel costs via the SIXT App. To do so, select the corresponding pump at a partner filling station in the SIXT App and start the refuelling process. You can only select a pump if you have activated your location data in the SIXT App (for more information, refer to → E: Requested permissions), as this is how it can be determined that you are within a radius of 300 metres of a partner filling station. You have the option of deactivating access to your location at any time. Choosing not to activate your location data results in some functions not working. Once the refuelling process is completed, the fuel quantity and the costs are sent to SIXT for invoicing. In this context, your contract data, telematics data and location data are processed.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

6.6. Locking the vehicle via the SIXT App

Purposes of data processing

You need to lock the vehicle again using the SIXT App in order to terminate the rental of the SIXT share and SIXT Fastlane products. Vehicles are locked via the Bluetooth function of your smartphone or via GSM in connection with your location data, provided you have enabled this function (for more information, refer to → E: Requested permissions). You can turn off the permission to access your location or the Bluetooth function at any time. Choosing not to activate your location data or Bluetooth may result in some functions not working. We process your contract data and telematics data when vehicles are locked using the SIXT App.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

6.7. Returning the vehicle via the SIXT App

Purposes of data processing

To ensure an orderly return and proper billing for a number of products (SIXT share, SIXT Fastlane, return to digital branches), when a vehicle return request is made, we check to see if the vehicle is in the contractual territory or at a suitable location and if it can be returned. We process the length of time you used the vehicle, the mileage and the amount of fuel in the tank to be able to invoice properly, and as just mentioned we check your vehicle's location to determine whether a ride may be ended in accordance with our conditions. In this context, we process your master data, contract data, communication data, financial data and telematics data.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

7. Connected vehicles

Purposes of data processing

Our vehicles may be linked to each other via what is referred to as connected vehicle functionalities. These enable us to receive vehicle information, such as fuel tank volumes, mileage, speed, condition of vehicle sensors, tyre pressure, date on which the next service is due, the activation of safety systems (e.g. airbags), and to send certain commands to the vehicle. The vehicle data are collected by SIXT or by the respective vehicle manufacturer, enabling us to properly maintain, care for and organise our fleet of vehicles. In this context, we process your contract data and telematics data.

Other data processing processes linked to the connected vehicle are described at the respective positions in this Privacy Policy where reference is made to telematics data.

Legal basis for the above processing

The relevant legal basis applicable to processing data under this Privacy Policy (for more information, refer to → Carrying out the rental contract when renting via the SIXT App; Transfer to third countries

Breach of contract or the law) is determined by how the telematics data are specifically processed. But generally this is:

Art. 6(1) sentence 1 point f) GDPR (maintaining, caring for and organising our fleet of vehicles).

Our legitimate interest in processing your personal data for maintaining, caring for and organising our fleet is to enable us to provide you with roadworthy vehicles at all times. It also enables us to promptly identify and carry out any necessary repair work.

8. Credit check

Purposes of data processing

In order to reduce the risk of non-payment, the credit rating of natural persons is checked for the conclusion of long-term rentals and for the SIXT+ and SIXT-share products. When using SIXT-share, the credit check is carried out before the start of the journey as soon as the expected invoice amount for the rental exceeds the currently approved limit of your credit card.

SIXT transmits personal data collected within the scope of these contractual relationships regarding the application, the execution and termination of this business relationship as well as data regarding non-contractual behaviour or fraudulent behaviour to SCHUFA Holding AG, Kormoranweg 5, 65201 Wiesbaden ("SCHUFA").

The legal basis for such transmissions is Art. 6 (1) sentence 1 point b) and Art. 6 (1) sentence 1 point f) GDPR. Transmissions on the basis of Art. 6 (1) sentence 1 point f) GDPR may only proceed to the extent that this processing of personal data is necessary to protect legitimate interests of SIXT or third parties and does not outweigh the interests or rights and freedoms of the data subject that require the protection of personal data. The exchange of data with SCHUFA also serves the fulfilment of legal obligations to conduct credit checks of customers (§ 505a and 506 of the German Civil Code).

The SCHUFA processes the data received and also uses it for the purpose of profile building (scoring) in order to provide its contractual partners in the European Economic Area and in Switzerland as well as, if applicable, other third countries (provided that an adequacy decision of the European Commission exists for these) with information, among other things, for the assessment of the creditworthiness of natural persons. More detailed information on SCHUFA's activities can be found at www.schufa.de/en/schufa-information/schufa-information_en.jsp.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) and f) GDPR.

Our legitimate interest in processing your personal data for credit assessment purposes is that we want to protect ourselves against payment defaults.

Recipients of your data

For the above-mentioned purpose we transmit data to SCHUFA Holding AG.

9. Marketing and direct advertising

Purposes of data processing

We perform a range of different measures for advertising purposes, to promote customer loyalty, to optimise customer offers and for market research and survey purposes. We may use your data collected over the past three years to offer you rental cars and other mobility solutions, suitable extras or services, such as mileage packages, recommended insurance packages or corresponding additional services like a diesel option. These data also enable us to have your preferred vehicle makes and models available for you. Extras or additional services can be offered to new customers on the basis of preferences shown by similar customers. In this context, we process your master data, contract data and, if enabled, your location data.

SIXT carries out the aforementioned marketing and direct advertising measures for itself and for the companies of the SIXT group listed in the Appendix as well as for SIXT franchisees and SIXT cooperating national companies.

Our marketing measures include raffles that are typically subject to separate terms and conditions. If you participate at one of our raffles, we will process data that you submit to us (usually by entering it in a entry form on our website or in one of our stations) for the purpose of taking part in the competition, to the extent necessary to carry out and conclude the raffle or competition.

We process your e-mail address, which we have received from you in connection with the sale of a product or service, for the purpose of direct advertising for our own similar goods or services.

You can object to your data being processed or used for the purposes of direct marketing at any time without incurring any costs other than those normally applicable to data transmission (e.g. internet connection costs, postage). Please send any objections to: Sixt GmbH & Co. Autovermietung KG, reference: Widerspruch (objection), Zugspitzstraße 1, DE 82049 Pullach or via e-mail to: dataprotection@sixt.com

Payback

If you participate in the PAYBACK programme, PAYBACK Rabattverein e.V., PAYBACK GmbH and SIXT are joint controllers for certain types of data processing. In this respect, they have stipulated in agreements which entity fulfils which data protection obligations. Upon request, PAYBACK will make the essential content of these agreements available to you. Contact details for PAYBACK and further details of the data privacy policy concerning participation in the PAYBACK programme can be found here:

<https://www.payback.de/info/hinweise-datenschutz>

Legal basis for processing

Art. 6 (1) sentence 1 point a) GDPR applies to data processing for purposes of implementing direct marketing measures that require explicit prior consent.

Art. 6 (1) sentence 1 point b) GDPR applies to data processing for the performance of a contract (e.g. contract to participate in a raffle) or in order to take steps prior to entering into a contract.

Art. 6 (1) sentence 1 point f) GDPR applies to data processing for purposes of implementing direct marketing measures that do not require explicit prior consent, and of implementing the marketing measures mentioned (→ Purposes of data processing).

Our legitimate interests in using your personal data for purposes of implementing direct marketing measures and the marketing measures mentioned lie in the fact that we want to convince you of our services and promote a lasting customer relationship with you.

Recipients of your data

For the purposes described in the foregoing, we disclose your data to IT service providers, call centres, advertising partners and providers of customer loyalty and bonus programmes.

10. Business customers/payment by third parties

Purposes of data processing

You can reserve and rent our vehicles in the SIXT App with conditions of your employer. In this case, your personal data are processed in accordance with this Privacy Policy. This also applies mutatis mutandi if a third party is to pay the invoice. We transmit personal data collected during the rental (in particular in the form of invoices and rental contracts, possibly also in the form of monthly statements, as well as possible traffic tickets and accident reports) to your employer or the third party who is to pay your invoice.

Legal basis for the above processing

The relevant legal basis applicable to processing data under this Privacy Policy is determined by how the data are specifically processed.

Art. 6 (1) sentence 1 point b) GDPR applies to the processing of data to the extent required to implement reservations, to conclude and perform rental and framework agreements and for customer relations purposes, otherwise Art. 6 (1) point f) GDPR.

Insofar as the processing of data for the purpose of settling the account with your employer or third parties or for clarification of facts (in particular in the case of accidents or administrative offences) is concerned, our legitimate interest is in being able to assert invoice amounts and other claims or to determine the party against which the damage claim is asserted.

Recipients of your data

For the purposes described in the foregoing, we disclose your data to your employer or the third person that will settle your invoice.

11. Damage and accidents

Purposes of data processing

In the event of damage being done to our vehicles, or our vehicles being involved in accidents, we process your personal data for the following purposes:

- providing customer services in cases of damage,
- handling claims,
- processing damage resulting from accidents (processing based on information provided by you and third parties such as the police, subsequent renters, witnesses, etc.).
- settling claims,
- receiving and processing complaints,
- providing help and assistance,

- securing and asserting our own claims.

In this context, we process your master data, communication data, contract data, financial data, third-party data and, where applicable, special categories of personal data (health data).

Legal basis for processing

Art. 6 (1) sentence 1 point b), c), f) GDPR and Art. 9 (2) point f) GDPR.

Our legitimate interest in using your personal data lies in handling cases of damage or accidents properly so as to protect our company against damages. This also includes our legitimate interest in exercising or defending legal claims when handling damages and accidents. We also have a legitimate interest in always providing you with damage-free vehicles. We are moreover obliged, pursuant to our contractual relations with third parties (e.g. insurance companies), to process your data for purposes of settling claims. Our legitimate interests in this respect lie in ensuring that we observe the contract terms.

12. Fraud prevention

Purposes of data processing

We use cookies and other technologies to process data (→ cf. App Analytics) to determine the end device used by the user and user behaviour. The data is stored in databases for purposes of fraud prevention, so that we can determine, for example, whether login processes have been carried out from your device before and whether the login is correspondingly “trustworthy”. If you log in with unknown devices, we can alert you to the fact that this may pose a security risk. The databases also store data on devices that have been used for (attempted) fraud in the past, as well as any associated master, communication and contract data. During a reservation process, we call up a risk assessment for the user’s device from the database of a specialised service provider. This risk assessment on the probability of a fraud attempt takes into account, among other things, whether the end device has connected via different service providers, whether the end device shows that the geo reference changes frequently, the number of transactions that have been made via the end device, and whether a proxy connection is used. In addition, for the purpose of risk assessment, we check whether your e-mail address has been reported for conspicuous behaviour or fraud patterns in the database of specialised fraud prevention service provider in the past and include this into our own decision to execute contracts or issue vehicles.

Legal basis for processing

Art. 6 (1) sentence 1 point f) GDPR

Our legitimate interest in using your personal data in this type of processing to prevent property offences is to protect our vehicle fleet and our contractual and non-contractual rights.

Recipients of your data

For the above-mentioned purpose, we transmit data to specialised fraud prevention service providers who may be located in countries that do not have an adequate level of data protection (in such a case, however, the data transfers are carried out with appropriate guarantees). → cf Transfer to third countries

13. Breach of contract or the law

Purposes of data processing

In the event of signs of criminal activity, e.g. theft, embezzlement, joy-riding, unauthorised use of vehicles or of vehicles being used in breach of contract, e.g. exceeding the maximum rental period or subrenting, we will take the following action for the purposes of preventing damage and protecting the ownership of our vehicles, vehicle parts and fuel:

- Geofence: our vehicles are equipped with an alarm system that alerts you in the event you leave the contractual territory defined by us. An automatic notification is sent by way of this alert. At the same time this automatic notification is sent, master data, communication data, contract data and telematics data are attributed to you so that you can be contacted and your attention drawn to the breach of contract.
- Unauthorised tyre change/fuel tank emptying: our vehicles are equipped with an alarm system to detect any unauthorised tyre changes or fuel tank emptying. An automatic notification is sent by way of this alert. Your master data, contract data, communication data and telematics data are only attributed to you if such unauthorised conduct is detected.
- Voucher abuse: we compare your legacy data (if your SIXT account was deleted) with the new data (when a new SIXT account is created) to detect any unauthorised voucher use when using our digital products (SIXT share). To this end, your legacy data are stored for six months. In this context, we process your master data, communication data, contract data and special categories of personal data (biometric data).
- Forwarding your data to the authorities: we may forward your master data, communication data, contract data, financial data and telematics data to the (criminal investigation) authorities in cases of criminal conduct or a risk being posed to public safety.

Should the competent authorities suspect you of having committed an administrative (e.g. speeding or parking illegally) or criminal offence with one of our vehicles then we will process not only the master data pertaining to you that we have stored, but also the data conveyed to us by the competent authorities.

Legal basis for processing

Art. 6 (1) sentence 1 point c), f) GDPR in conjunction with the respective statutory regulation.

Our legitimate interest in using your personal data lies in protecting our property by means of the aforementioned measures so as to protect our company against damages. We also have a legitimate interest in protecting our fleet of vehicles as well as our contractual and extra-contractual rights.

14. Improving our processes and offerings

Purposes of data processing

To improve the quality of our processes and offers, as well as to optimise our customer relations, we perform analyses of potential, with the aid of probability values in respect of future rentals and take-up rates for our offers, which take the form of evaluations and reports as well as customer satisfaction surveys, with a view to meeting the expectations of our customers in terms of providing high-quality products and services. This also serves to enable us to define sales revenue targets for our company, optimise capacity planning to improve vehicle usage as well as to identify and troubleshoot sources of errors. Our customers are grouped according to specific criteria in order to perform the analyses of potential. These criteria include in particular order history, sales revenues and claim statistics.

We also process your master data, communication data and contract data in connection with our SIXT group companies, cooperation and agency partners and franchise partners for purposes of optimising the related processes and offers (cf. → Reserving vehicles, Renting vehicles) In this context, we process your master data and contract data. The aforementioned processing steps are carried out with the aid of a data shop. Our data shop contains all data collected in the company. We further use the data shop for internal purposes, e.g. business evaluations, marketing strategies, price calculation for our products and cost controls.

The forementioned processing steps are performed with database applications to effectively administer and analyse the data. We furthermore use the database applications for internal purposes, such as business analyses, marketing strategies, price calculations for our products and cost control.

Processing in our database applications is conducted in an anonymised or pseudonymised form

We also process address data originating from external service providers to update our address database and to ensure that the master data we use for contract handling is correct.

Legal basis for processing

Art. 6 (1) sentence 1 point a) of the General Data Protection Regulation (GDPR) applies where consent is required to implement measures intended to optimise our processes and offers.

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest in using your personal data lies in improving our services and further developing our products on an ongoing basis. We also have a legitimate interest in improving customer satisfaction levels.

15. Refer a friend programme

15.1. Personal data of recommender

Purposes of data processing

Under the Refer a friend-Program registered SIXT customers ("Recommender") are able to easily recommend SIXT services to their friends and relatives ("Friend"). For this purpose, the Recommender is provided with a referral link which he/she can forward to friends and relatives by using his/her preferred channel (e.g. by SMS, e-mail, WhatsApp, Facebook Messenger). Recommender as well as Friend will each receive a premium for every Friend who registered via the forwarded referral link and who then uses SIXT services.

As far as you as a Recommender participate in our Refer a friend-Program part of your master data and communication data (first name, last name, e-mail address and your IP address) will be processed for the purpose of program implementation as well as premium handling and avoidance of fraud. In addition, every referral link contains a unique identification (containing your first and last name) which enables us to track whether the friend you have contacted is registering for our offer. Participation in our Refer a friend-program is voluntary. Please note that without providing your data you cannot participate in the Refer a friend-program.

Legal basis of the processing

Art. 6 (1) sentence 1 point b) GDPR for data processing for the purpose of implementation of the Refer a friend-program and fulfilment of the respective contractual obligations including your right of participation, technical processing of the program, provision of the premium

Recipients of your data

For the purposes described in the foregoing we use IT service providers as well as providers of customer loyalty or bonus programs where required for the technical processing of the Refer a friend-program. They get access to the following data: first name, last name, e-mail address and IP address of the Recommender.

15.2. Personal data of Friend

Purposes of data processing

The recommendations sent by Recommender to friends, relatives or acquaintances contain a referral link which enables the respective recipient ("Friend") to register for our offer. We only receive personal data from you as a Friend when you, as recipient of a referral, click on the referral link. As part of the Refer a friend-program we only provide Recommender with a referral link which from a technical point of view enables us to record a Friend's registration and assign it to Recommender in order to provide both Recommender and Friend with a premium subject to a successful referral. It is Recommender's responsibility to whom they send the referral link in order to recommend a person. In case you ignore the recommendation by not clicking on the referral link, neither SIXT nor any possible service provider involved as part of the Refer a friend-program will receive and process your personal data.

Every referral link contains a unique identification of Recommender (including first and last name) which enables us to assign your registration to Recommender. In case you, as recipient of a referral, click on the referral link we gather and process this information in order to determine whether your registration follows a recommendation as well as to handle the premium. We can only explicitly assign this information to your person if you register as a customer for our offer and in this context provide your master data. The processing of the data gathered as part of the Refer a friend-program will be carried out exclusively for the purpose of ensuring the premium for you and Recommender and in order to allow for the respective registration for the SIXT offer.

Legal basis of the processing

Art. 6 (1) sentence 1 point b) GDPR for data processing for the purpose of providing the premium as part of the registration and set up of your account.

Art. 6 (1) sentence 1 point f) GDPR for data processing for the purpose of implementing the Refer a friend-program, in particular the assignment of the referral to Recommender for the provision of the premium.

Our legitimate interests in using your personal data for the purpose of implementing the Refer a friend-program lies in our desire to ensure the effective and user friendly handling of the program, in particular the proper recording of a Friend's registration in order to provide Friend and Recommender with the premium as well as to fulfil the respective contractual obligations vis-à-vis Recommender.

Recipients of your data

For the purposes described in the foregoing we use IT service providers as well as providers of customer loyalty or bonus programs where required for the technical processing of the Refer a friend-program. They get access to the following data: first name, last name and e-mail address of the Friend.

16. Customer Relations

Purposes of data processing

You can contact Customer Relations in order to resolve a technical error relating to a connected vehicle. Customer Relations can remotely unlock or lock a vehicle after verifying a number of security features. Your self-generated PIN, driver's licence number, date of birth and location (as stated on the phone) are required to identify yourself. This information is compared with the vehicle's GPS location data. In this context, we process your master data, contract data, communication data, telematics data and, in this case, your location data by means of a telephone query.

Legal basis for processing

Art. 6 (1) sentence 1 point b) GDPR.

17. Renting TIER e-scooters

Purposes of data processing

Renting an e-scooter via the SIXT App means drawing on the services of TIER Mobility GmbH (TIER). In this context, we process your master data, communication data and contract data, as well as your financial data to debit the rental fee (on behalf of TIER). TIER uses these data as an independent controller particularly in the event that you require a copy of an invoice or would like to contact TIER's customer service department.

Legal basis for processing

Art. 6 (1) sentence 1 point b) GDPR (TIER as controller)

Recipients of your data

We transmit data to TIER Mobility GmbH for the above-stated purpose

18. Events and donations

Purposes of data processing

We organise a variety of different events to promote customer relations and customer loyalty. We also organise a number of charitable activities, such as appeals for donations. We process your master data and communication data for the aforementioned purposes.

Legal basis for processing

Art. 6 (1) sentence 1 point f) GDPR

Our legitimate interests in using your personal data for customer service, customer loyalty and charitable purposes lie in our desire to, on the one hand, offer the best possible services and sustainably raise customer satisfaction, and, on the other, fulfil the social responsibilities that we, as a large company, are bound to.

19. App Analytics

Purposes of data processing

Our App uses technologies to analyse user behaviour and to evaluate related data. These technologies help us to optimise and continuously develop our App. These processes are carried out anonymously or using pseudonyms, but never in a directly personalised manner. You can find more information on app analysis within the App (within the App, refer to → Account → Information on App Analytics). You can deactivate the app analytics centrally in the App at any time (within the App, refer to → Account → Settings → App Analytics).

Legal basis for the processing

Art. 6 (1) sentence 1 point f) GDPR

Our legitimate interest in processing analytics data via our App is to optimise and further develop our App and thereby offer our customers the best possible services and increase customer satisfaction.

E: Requested permissions

For some functions, the App needs to be able to access certain services and data on your mobile device. In the following, we will explain which permissions the App might request and which type of functions require such permissions in the various operating systems.

You can manage, i.e. view, grant or revoke, the permissions in your operating system. In iOS, you do this by opening "Settings". The menu that opens will show you all the Apps installed on your device. Select the SIXT App from this menu to manage your permissions (for more information, refer to [About privacy and Location Services in iOS and iPadOS](#)). In Android, you can also open "Settings" and select the "Apps" menu. The menu that opens will show you all the Apps installed on your device. Select the SIXT App from this menu to manage your authorisations (for more information, refer to [Control your app permissions on Android 6.0 and up](#)). Depending on the Android version you are using, the denominations might vary slightly.

Location

When you open the App for the first time, you will be asked whether the App is allowed to access the location of your device. If you agree, the App can use different technologies (GPS, Bluetooth, Wi-Fi) to determine your exact location. The location may also be retrieved when the App is not being used. Your operating system will show you that the location permission is being used (by displaying an arrow or a location icon). This permission allows you, for instance, to find the closest SIXT branch or SIXT share vehicles in your vicinity.

Camera permission

When you open the App for the first time, iOS will ask you whether the App is allowed to use the camera of your device. In order to provide you with the best possible user experience, we need permission to access the camera for some of the functions on offer. Camera access is, for instance, required in order to document damage to the vehicle or to take photos when validating your SIXT account.

Notifications

When you open the App for the first time, iOS will ask you whether the App is allowed to send you notifications (so-called push notifications). If you agree, you will receive notifications regarding status events (e.g. end of rental), promotions or new products, even when the App is not opened at the time. These notifications might alert you by means of sound, notifications and/or badges (an image or figure on the App icon). You can turn off notifications at any time in the App profile in the Account, Settings or notification functions.

Furthermore, you can turn off notifications in iOS by opening "Settings" and selecting the "Notifications" menu. The menu that opens will show you all the Apps installed on your device that enable notifications. Select the SIXT App in this menu and turn off (or turn on) notifications (for more information, refer to [Use notifications on your iPhone, iPad and iPod touch](#)).

In Android, you can turn off notifications by opening “Settings” and selecting the “Notifications” from the “Sound and notification” menu. The menu that opens will show you all the apps installed on your device that enable notifications. Select the SIXT App from this menu to turn off (or turn on) notifications. Depending on the Android version you are using, the denominations might vary slightly.

Calendar

When you open the App for the first time, iOS will ask you whether the App is allowed to access your calendar. This permission is required if you want to add reservations to the calendar on your device and if you want to receive reminders of upcoming reservations.

Bluetooth

When you open the App for the first time, iOS will ask you whether the App is allowed to use the Bluetooth function. Bluetooth is a radio technology standard used for exchanging data between mobile devices over short distances. This technology is used, for instance, to lock or unlock SIXT share vehicles.

F: Transfer to third countries

If you use our services to reserve vehicles that are to be rented in a third country, we transmit your personal data and the data of any additional drivers to our business partners in such third country. This also applies if you use partner programmes from third countries. In cases of damage and/or accidents suffered in a third country, we may send your personal data and data of any additional drivers to the competent authorities and to insurance companies in such third country.

The transfer of your data to a third country is based on an adequacy decision by the European Commission. If no adequacy decision by the European Commission exists for the respective third country, then the transfer to that third country will take place subject to appropriate safeguards as per Art. 46 (2) GDPR. You can request copies of the aforementioned safeguards from SIXT by writing to the address specified above (cf. → A: Data controller, contract details of the data protection officer). Third countries are countries outside the European Economic Area. The European Economic Area comprises all countries of the European Union as well as the countries of the so-called European Free Trade Association, which are Norway, Iceland and Liechtenstein.

G: Categories of recipients of your data

We sometimes draw on the services of external service providers and companies belonging to the SIXT Group to fulfil our contractual and statutory obligations and to fulfil our legitimate interests.

We may also transfer your personal data to other recipients such as public authorities, e.g. for statutory disclosure requirements to tax authorities or prosecuting authorities; to credit institutions, for instance to handle payments, to experts, for instance to process claims, or to lawyers, for instance to defend and asset legal claims.

H: Duration of storage

We store your personal data until they are no longer necessary in relation to the purposes for which they were collected or otherwise processed (cf. → D: The purposes of data processing at SIXT). Your SIXT account will be deleted if you do not use it to rent a vehicle from SIXT for six years. We carry out such deletions once a year.

Where we are under legal obligation to store personal data, we will store personal data for the preservation period stipulated by law. These include statutory periods of limitation, which may be anywhere between three and thirty years. There may also be retention periods stipulated of between six and ten years for tax and commercial reasons under the German Commercial Code and the Tax Code. During this period, your data may be subject to restricted use within day-to-day operations if its processing serves no further purposes. The legal basis for this storage is Art. 6 (1) sentence 1 point c) GDPR in conjunction with the respective statutory regulation. During this period, your data may be subject to restricted use within day-to-day operations if its processing serves no further purposes.

I: Automated decision-making.

The aforementioned data processing does not include any automated decision-making pursuant to Art. 22 GDPR.

J: Profiling

We sometimes process your data in an automated way with the aim of evaluating certain personal aspects (profiling). We use profiling in the following cases:

- We evaluate data by means of what are known as connected vehicle functionalities in order for us to be able to maintain, care for and organise our fleet of vehicles. These measures are also intended to protect you (see section D:7 The purposes of data processing at SIXT, no. 7).
- We perform analyses of potential to improve the quality of our processes and offers and to optimise our customer relations. To this end, our customers are grouped according to certain criteria, such as order history, sales revenue and claims statistics (see section D:7 The purposes of data processing at SIXT, no. 15).

- We implement different measures to enable us to provide you with targeted information and advice about products. These make it possible to pursue appropriate advertising activities including market research and surveys (see section D:7 The purposes of data processing at SIXT, no. 9).

K: Rights of data subjects

1. Right of access by the data subject, Art. 15 GDPR

You have the right to, at reasonable intervals, obtain information about your personal data under storage. The information you are entitled to includes information about whether or not SIXT has stored personal data concerning you, about the categories of personal data concerned, and about the purposes of the processing. Upon request, SIXT will provide you with a copy of the personal data that are processed.

2. Right to rectification, Art. 16 GDPR

You also have the right to obtain from SIXT the rectification of inaccurate personal data concerning you or to have incomplete data completed.

3. Right to erasure, Art. 17 GDPR

You furthermore have the right to obtain from SIXT the erasure of personal data concerning you. We are under obligation to erase personal data in certain circumstances, including if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, if you withdraw the consent on which the processing is based, or if the personal data have been processed unlawfully.

4. Right to restriction of processing, Art. 18 GDPR

Under certain circumstances, you have the right to have the processing of your personal data restricted. These include circumstances in which you contest the accuracy of your personal data and we then have to verify such accuracy. In such cases, we must refrain from further processing your personal data, with the exception of storage, until the matter has been clarified.

5. Right to data portability, Art. 20 GDPR

Should you opt to change to a different vehicle rental company, you have the right either to receive, in a machine-readable format, the data that you provided to us based on your consent or on a contractual agreement with us, or to have us transmit, also in a machine-readable format, such data to a third party of your choice.

6. Right to object, Art. 21 GDPR

a) Right to object in certain cases.

If the processing of your data by SIXT is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Art. 6 (1) sentence 1 point e) GDPR) or is based on the legitimate interests of SIXT (Art. 6 (1) sentence 1 point f) GDPR), then you have the right to object at any time, on grounds relating to your particular situation, to the processing of your data. This also applies to any profiling based on this provision as defined by Art. 4 no. 4 GDPR, which we use for what are referred to as connected vehicle functionalities, for improving our processes and offerings or for advertising purposes. We will then end the processing, unless we can present compelling legitimate grounds for such processing that supersede the grounds for ending the processing.

b) Right to object against the processing of data for the purposes of direct marketing (as defined by section D, no. 9 of this Privacy Policy)

In individual cases, we process your personal data for direct marketing purposes. You have the right to object to your personal data being processed for the purposes of such marketing activities; this also applies to profiling to the extent that it is associated with such direct marketing.

If you object to your data being processed for direct marketing purposes, we will no longer process your personal data in this way.

You may exercise your right to object without the need to adhere to a particular format and direct it to:

Sixt GmbH & Co. Autovermietung KG, Zugspitze 1, DE 82049 Pullach

or to the e-mail address: dataprotection@sixt.com

7. Right to withdraw, Art. 7 (3) GDPR

If data processing at SIXT is based on your consent, then you have the right to, at any time, withdraw the consent you granted. The withdrawal of consent shall not affect the lawfulness of processing between the time consent was granted and the time it was revoked.

8. Contact information to exercise the rights of data subjects

If you wish to exercise your rights as a data subject, please direct such requests to the e-mail address: dataprotection@sixt.com.

9. Right to lodge a complaint, Art. 77 GDPR

You have the right to lodge a complaint with a supervisory authority (Art.77 GDPR). You can exercise this right before a supervisory authority in the Member State in which you are resident, where your place of work is or the place where the suspected infringement is committed. In Bavaria, where SIXT has its headquarters, the competent supervisory authority is:

Bayerisches Landesamt für Datenschutzaufsicht (BayLDA)
Promenade 18
D-91522 Ansbach

General information

We reserve the right to amend and adapt this Privacy Policy with effect for the future.

Current version: September 2021

Appendix: Companies

Sixt GmbH & Co. Autovermietung carries out the marketing and direct advertising measures described in the Privacy Policy for itself and for the following companies:

- Sixt Ride GmbH & Co. KG Germany
- Sixt B.V. The Netherlands
- Sixt Belgium BV Belgium
- SIXT S.à.r.l. Luxemburg
- SIXT RENT A CAR S.L Spain
- Sixt rent-a-car AG Switzerland
- Sixt G.m.b.H. Austria
- Sixt rent a car Srl Italy
- Sixt rent a car Ltd. United Kingdom
- Sixt Rent A Car LLC USA
- SIXT franchisees and SIXT cooperating national companies worldwide