

CNR AUTO LTD.

PRIVACY POLICY

The CNR AUTO LTD, its rental and other rental-related businesses, respects the privacy rights of Our customers and We are committed to protecting your privacy. This Privacy Policy (the "Policy") explains Our data handling practices as a "Controller" with regard to your Personal Data, as well as your rights associated with your Personal Data. This Policy was last materially updated on September 21, 2023.

1. Scope

- This policy covers the information We obtain from you in connection with Our vehicle rental and other associated businesses, which identifies you as an individual.
- This policy does not cover information that cannot be used to identify you as an individual.

2. Information We collect (what & how)

- We, Our advertisers, licensees, business partners, and discount sponsors may collect information from you in a multitude of ways, including, but not limited to, phone calls, customer service contacts, mobile apps, websites, and other sources.
- We collect information from customers during the process of reservation and rental transactions, such as name, address, and payment card information.
- Personal data to provide you with exceptional rental services, including, but not limited to;
 - Name, phone number, address, date of birth
 - Driver's license or other forms of identification
 - Pictures and facial scans, some of which may be considered biometric data under applicable laws

- Employer information (number, address, contact information)
- Credit worthiness or other background information

3. Purposes for processing

- Information you provide will be used to provide you with the services you request.
- We will use the contact information you provide to communicate with you.
- We use “cookies” and other electronic tools to collect statistical information about your use of Our websites. This information is used for research and other reasons, generally to better help Our customers by showing Us how We can improve Our websites.
- We do use personal information for Our own analytical purposes.

4. 3rd Party Disclosures

- We may provide your information to designated third-party service providers, rental discount sponsors you utilize, Our licensees, and other entities.
- We may sell or otherwise monetize your information to unrelated third parties where permitted by law.
- We may share your information for marketing purposes to those with which We have an agreement to do joint advertising, subject to your consent.

5. International Transfers

- Your information may be transferred out of your country or region of residence to countries such as the United States for processing and storage.
- Your information may be transferred out of your country or region of residence upon your instruction.

6. Security

- We use reasonable measures to safeguard Personal Data from theft, unauthorized use, disclosure, or modification.
- We aim to maintain appropriate physical, procedural and electronic safeguards to protect your Personal Data.

7. Data retention

- We generally keep customer information for as long as We believe necessary for the purpose for which it was collected, or as allowed by law.

8. Access, correction & portability

- You will have access to review or update Personal Data that is collected from and about you, so you can change any information that is incorrect.
- We will try Our best to accommodate your request, but We reserve the right to impose certain restrictions and requirements.

9. Withdraw consent or complaints

- Where We use consent as a basis for processing, you can always withdraw that consent.
- If you feel that this policy has been violated, We will work with you to resolve your concerns.

10. Changes

- We may modify this Privacy Policy at any time, but changes will not apply retroactively.
- We will notify you when We make material changes by posting a note on the homepages of Our websites.

Our goal is to provide Our customers with excellent services. We do business in many countries and We aim to comply with all privacy laws that apply to the data We collect and use. This policy is subject to compliance with local law. Where this policy provides a

higher standard than local law, this policy will control how CNR AUTO handles your Personal Data. By providing your Personal Data to Us, Our designated service providers, or other third parties as noted within this Policy, you consent to Our use and disclosure of your data for the operational and other purposes listed in this Policy.

1. SCOPE & CONTROLLERS

CNR AUTO Ltd, and its specific rental business affiliates and subsidiaries are data controllers for purposes of this Policy. As Our entrusted third-party vendors are independent companies, they are not owned or controlled by Us and are not covered by this policy. We are not responsible for the privacy practices of Our licensees, and other third parties with whom you may transact.

This Policy covers the information We collect about you in connection with Our vehicle rental businesses, which does, or can be used to identify you as an individual (“Personal Data”). It does not apply to information that cannot reasonably identify you as an individual. For example, but without limitation, aggregated anonymous data, computer operating systems, aggregated preferences, vehicle identification numbers, etc. are not Personal Data.

Our websites are not directed to individuals under the age of 13, and We do not knowingly obtain Personal Data from such individuals.

2. DATA COLLECTION (WHAT & HOW)

We, both directly and through Our service providers, business partners, discount sponsors, licensees, advertisers, and booking channel providers, collect Personal Data that you provide on Our websites, on third-party websites, on applications, and offline in connection with any inquiries, reservations, rentals, purchases, or services. Information collected about your use of Our websites, applications, or other websites may be combined with personal or other information about you from other online or offline sources. We also will collect Personal Data across all the devices you use to access websites or applications of Us and Our designated service providers.

Providing your Personal Data to Us may be required due to a legal obligation which could be a statutory or contractual obligation, may be on a voluntary basis or may be

necessary for us to enter into the contract with you, depending on the purposes for which we collect and use your Personal Data as set out in this Privacy Statement. However, if you do not provide your Personal Data to Us this may result in disadvantages to you, e.g. we may not be able to provide certain products or services to you. However, unless otherwise stated, not providing your Personal Data will not result in legal consequence for you.

Do not provide information about others unless you are authorized to do so and have obtained consent to have all information used, disclosed, and transferred in accordance with this Privacy Policy. By submitting information about others, you represent and warrant that you are authorized to do so and that you have received authorization from the person about whom you are providing the information and for non-EU residents, that person has consented to have all information used, disclosed, and transferred in accordance with this Privacy Policy.

a. TYPES OF INFORMATION COLLECTED: The types of information collected regarding you and your interactions with Us may include, but is not limited to:

Personal Information	Technological Information	Rental Information
Your name,	IP address,	Payment card information,
Email address,	Device ID,	Video of you and interaction with Us,
Phone number,	IP address;	Membership organization number,
Residency address,	Browser type;	Frequent flyer number,
Date and place of birth,	Language;	Loyalty program,
Gender,	Operating system;	Organizational affiliations,
Age,	Mobile device identifiers;	Employee ID number,
Passport number,	Geo-location data;	Employer name and contact information,
Driver’s license or other ID or other photograph,	The state or country from which you accessed Our websites;	Rental or purchase location,

Information that may constitute biometric data, such as facial scans,	The specific webpages visited;	Return location,
Credit score and history,	The date and the time of a visit;	Geographical areas visited,
Criminal history,	The websites you visited immediately before and after visiting Our websites;	Preferences and usage information,
Background	The number of links and specific links you click within Our websites;	Charges incurred, Purchase prices and details,
	The functions you use on Our websites;	Itinerary information,
	Any reservations, updates, purchases, or other transactions through Our websites;	Data related to claims
	The data you view or download from Our websites; and The number of times you view any particular advertisements	

Sensitive Data: We, both directly and through our service providers, business partners, discount sponsors, licensees, advertisers, and booking channel providers, may collect certain Personal Data that constitutes sensitive data in some countries, such as data about health conditions or membership of a trade union. Depending upon applicable local law, We may be unable to process such sensitive data without your consent. Data about your health conditions is regarded as sensitive in many countries. If you ask Us to accommodate a disability, such as by provision of hand controls, or if there is an accident and We need to work with insurance and claims management companies relating to any injury you may incur, We may need to process data about your health conditions. Similarly, in the EU, at least, your membership of a trade union or similar organization is regarded as sensitive and We may need to process this information if you use a CDP Number that only members of that union or organization can use.

Please note that if you wish to rent with Us or Our licensees and need to provide sensitive data, we will use that sensitive data for Our operational uses as described in this Privacy Policy, subject to your consent where required under applicable law.

b. METHODS AND SOURCES OF COLLECTION: We, both directly and through Our service providers, business partners, discount sponsors, licensees, advertisers, and booking channel providers, may collect your information through a variety of methods. These methods may include, but are not limited to:

On Line; Off Line	Our websites;
<p>Our kiosks; Our mobile “apps”; Our official third-party social network pages; Your computer’s web browser; Third-party social networks; Telematics devices; Call recordings Video recordings</p>	<p>Calls to or from Our reservation, customer service, emergency roadside assistance, customer contact or member care centers; Interaction with Our various licensees, affiliates, and subsidiaries, including car sales and other businesses; In-person at rental locations; In-vehicle or in-equipment technology or through other telematic devices; When you join Our membership programs; In connection with a reservation (even an abandoned or interrupted reservation); A rental of a vehicle or equipment, or your purchase of a vehicle or equipment; Reservations you make with Us through licensees, travel agents or brokers, online or in-person; Transactions you complete with Us, Our licensees, and agents including options you take, charges you incur and any incidents or accidents that may occur; CDP Sponsors or sponsors of promotion codes, affiliation, or special discount codes; Consumer reporting agencies; And other companies that have business relationships with Us, such as Our licensees, affiliates and business partners, including airlines, hotels, and insurance companies. Claims Management service providers (either affiliated directly with Us, or operated by a third-party)</p>

c. UTILIZATION OF COOKIES AND OTHER ELECTRONIC TOOLS: We and Our service providers, business partners, discount sponsors, advertisers, and advertising servers may place, view, or use "cookies", web server logs, web beacons, pixel tags, or other electronic tools to collect statistical and other information about your use of Our websites and other websites. This information may include information described above in Section 2.a

We and the parties with which We work, as described in this Privacy Policy, may use the information collected for the purposes described in this policy, or as allowed by law; either on behalf of Us or third parties; including operational changes, research, analysis, to better serve visitors to Our websites (such as by enabling log-in, providing access to certain sections of websites, providing customized content, or presenting online advertising tailored to you or your interests as described further below), to compile aggregate and anonymous information about usage of Our websites and other websites, other statistics, and more.

If you have deleted and disabled cookies, these uses will not be possible to the extent they are based on cookie information.

d. WEB ADVERTISING: We, Our designated service providers, or third-party advertisers or their advertising servers, may place or recognize unique cookies on your computer or use other electronic tools in order to help display advertisements that you see on Our websites or on other websites. Information about your visits to, and activity on, Our websites and other websites, is used, alone or in combination with other information, to display on your device screen advertisements that may be of particular interest to you. We may use web beacons, pixel tags, or other such technologies provided by third-party advertising companies, to help manage and optimize Our online advertising and product performance. These technologies enable Us to recognize user visits to our websites, and to learn which banner ads bring users to Our websites.

As the internet and other eCommerce channels continue to develop, We may deploy and utilize different types of technologies to collect data regarding your visit or usage.

e. VEHICLE MANUFACTURERS: Please note that the rental vehicles you operate may collect personal information about you. We are not responsible for these activities, and such collection (and use) is subject to the vehicle manufacturer's policies and notices.

3. PURPOSES FOR PROCESSING

a. OPERATIONS AND SERVICES: We, both directly and through our service providers, business partners, discount sponsors, licensees, and booking channel providers, may use your information to provide you with the services or products you request from Us.

We may use your information to communicate with you regarding any reservation you initiate or rental transaction; your membership/status in one of Our membership programs; or changes to the terms or features of any of Our membership programs to which you belong.

We therefore process your Personal Data for these purposes to the extent necessary to perform our contract with you or to take steps at your request prior to entering into a contract with you.

For United States Residents, so that We may communicate with you, you give Us your consent to call you on or send text messages to your mobile telephone/device. You also consent to Our use of auto-dialers and pre-recorded messages in connection with any such telephone call or text message, including calls or texts to mobile telephone numbers. We will not charge you for such calls or texts.

CNR AUTO may take action on the basis of your driving behavior and driving behavior data (including, but not limited to geolocation, speed, mileage, braking, and damage data) derived from in-vehicle telematics and other devices or gauges or on the basis of other criteria relevant to your rental and usage of Our vehicles. Actions may include suspension or termination of your ability to continue to rent vehicles from CNR AUTO or its affiliates. CNR AUTO may also provide or sell this information to third parties.

b. OUR MARKETING: We, both directly and through Our service providers, business partners, discount sponsors, licensees, advertisers, and booking channel providers, may use your Personal Data to provide you with marketing information, special offers, and promotions via various means including e-mail, in accordance with applicable law.

Where We have obtained your consent to send these marketing communications to you, We therefore process your Personal Data for these purposes on the basis of your consent. However, where permitted by applicable law We may lawfully use your

Personal Data to send you such marketing communications (including via email) without your consent. Where permitted by applicable law We may also process your Personal Data for these marketing purposes where necessary for Our legitimate interests, which include promoting Our products and services, special offers and promotions which may be of interest to you.

You can unsubscribe from receiving such messages at any time by contacting Us at the details below under "Contact Us" as well as the unsubscribe link in each e-mail message. You can also request at any time that We do not to use your Personal Data covered by this Privacy Policy to provide you with special offers and promotions by contacting Us at the details below under "Contact Us". Please note that if you exercise these choices, you will continue to receive communications concerning your account and products and services you requested, and in response to any requests for information by you. Please also note that this opt-out process may take some time to complete, consistent with applicable law. Third-party rental sponsoring organizations are solely responsible for their own practices, and an unsubscribe request must be sent to any such organization from which you would like to stop receiving marketing materials.

c. THIRD-PARTY PURPOSES: As part of Our Services, We have engaged with third-party organizations that sponsor the CDP, member, employee, or other number used by you to complete a rental or purchase ("Sponsoring Organization"). As a result of Our relationship with these Sponsoring Organizations, We may be under an obligation to provide the third party with details about you and your use of Our services as they relate to your relationship with the Sponsoring Organization.

We Process your Personal Data in relation to Sponsoring Organizations to the extent necessary for performance of our contract for rental or purchase where you use a CDP, member, employee, or other number.

Sponsoring Organizations may have different privacy practices than We do, and We recommend you review the Sponsoring Organization's privacy policy for the purposes which they will use your information. As We do not control the Sponsoring Organization's privacy practices, they may not be the same as Ours. However, because of your relationship with the Sponsoring Organization, they can use Personal Data which they receive from Us for the purposes specified in their privacy policies or similar statements.

d. NORMAL COURSE OF BUSINESS: We may also process your Personal Data and other information if such processing is necessary:

(a) to comply with the law or in response to a subpoena, court order, law enforcement request, or other legal process; (b) to protect the interests, rights, safety, or property of Us or others; (c) to enforce any terms of service on Our websites or the terms and conditions of any rental, purchase, or utilization; (d) to provide you and others with the services or products requested by you or your designated representative, and to perform other activities related to such services and products, including billing and collection; (e) to provide you with special offers or promotions from Us that may be of interest to you, where permitted; (f) as part of a business transaction where all or some of Our assets are bought, sold, or otherwise transferred by act of law or contract; or (g) to operate Our systems properly.

4. DISCLOSURES TO AFFILIATES AND THIRD PARTIES:

a. THIRD-PARTY PROVIDERS: For the purposes described in this Policy, We may share your personal and other information with our service providers, business partners, discount sponsors, licensees, assigns, advertisers, and booking channel providers. We may share with other third parties aggregate or anonymized information about Our website users, such as your use of this website or other websites, and the services provided on this website or other websites, as well as any rental, purchase, or utilization information. We may provide information about you and your interactions with Us to any third-party organization that sponsors the CDP, member, employee, or other number used by you to complete a rental or purchase. We may also share your Personal Data with a sponsor or other third party that provides you with special offers or promotions that may be of interest to you ("Third-Party Provider") where permitted. You may instruct Us at any time not to share your Personal Data covered by this Privacy Policy with such Third-Party Providers by contacting us in the manner set forth below.. Please note that (i) this opt-out process may take some time to complete, consistent with applicable law; and (ii) even after such opt-out process is completed, your personal and other information may continue to be shared with our affiliates (including affiliated websites under common ownership or control) and designated service providers.

b. SPONSORING ORGANIZATIONS: We may provide personal information about you and your interactions with Us to those third-party organizations that sponsor the CDP, member, employee, or other number used by you to complete a rental or purchase. The use by such sponsoring thirdparty of your information, including information regarding your interactions with Us, is subject to that organizations privacy policy and relationship with you. We are not liable for and make no assertions of any particular uses of information by such organizations.

c. SOCIAL MEDIA: If you participate in certain public features of our websites, apps, or social media websites/apps, please note that any information you or others voluntarily disclose through use of such features, becomes available to the public and/or other users whom you have designated. If you choose to provide access credentials to designated individuals, please be aware that any information you provide to Us may be visible to such individuals. We are not responsible for the information that you or others choose to disclose publicly and neither Our nor others' use of such information is subject to this Privacy Policy.

d. LINKS TO THIRD PARTIES: We may provide links to third-party websites, or may be linked to from third-party websites. Since We do not control third-party sites, and We are not responsible for any information you may provide while on such sites, We encourage you to read the privacy policies on those websites before providing applicable third-parties with your information.

e. LICENSEES: We may provide your Personal Information to Our licensees when it is necessary to complete a reservation or rental, to assist with a customer service issue, or to perform any other activities related to open or previous services or products which We have provided to you.

f. GENERAL COURSE OF BUSINESS: We may also disclose your personal and other information to unaffiliated third parties if We believe in good faith that such disclosure is necessary: (a) to comply with the law or in response to a subpoena, court order, law enforcement request, or other legal process; (b) to protect the interests, rights, safety, or property of Us or others; (c) to enforce any terms of service on Our websites or the terms and conditions of any rental, purchase, or utilization; (d) to provide you and others with the services or products requested by you or your designated representative, and to perform other activities related to such services and products, including billing and collection; (e) to provide you with special offers or promotions from Us that may be of interest to you; (f) as part of a business transaction where all or some of Our assets are bought, sold, or otherwise transferred by act of law or contract; or (g) to operate Our systems properly.

5. INTERNATIONAL TRANSFERS

Some of the uses and disclosures mentioned in this Privacy Policy may involve the transfer and processing of your Personal Data to and in various countries around the world, that may have different levels of privacy protection than your country of residence or interaction with Us.

CNR AUTO and its subsidiaries are committed to the secure transfer of data internationally. Despite Privacy Shield being invalidated, CNR AUTO upholds its Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, and Access. Further, CNR AUTO implements the European Commission Standard Contractual Clauses and similar agreements relating to countries outside of the European Economic Area in order to allow Personally Identifiable Data to be transferred to Vendors, affiliates or subcontractors. You can request a copy of these standard contractual clauses by contacting us as set out in "Contact Us" below.

6. COOKIES AND ONLINE ADVERTISING CHOICES

Many browsers are set to accept cookies by default. You may be able to set your browser to disable cookies, or alert you when cookies are being sent. Many mobile devices allow you to disable the ability for geo-location information to be collected from your mobile device. The help function on most browsers and mobile devices contains instructions on how to set your browser to notify you before accepting cookies, disable cookies, or disable the collection of geo-location data.

You need to set each browser, on each device you use to view websites. If you disable cookies or refuse to accept a request to place a cookie, it is possible that some parts of Our websites or other websites will not function properly, and the advertising you receive when you visit Our websites or other websites may not be tailored to your interests. We may not respond to a web browser's "do not track" signal, or other mechanism that indicates a request to disable online tracking of individuals who use or visit Our websites.

Our designated service providers assist Us with advertisement display functions and related analytics for Our websites. To view information or opt out of Google Analytics for Display Advertising, please [click here.](https://policies.google.com/technologies) (<https://policies.google.com/technologies>) Note that even if you exercise choice for targeted advertising, you will still receive general

online advertising. Information regarding you and any interactions with Us may be collected and utilized to provide you with targeted advertising on the web.

With regard to mobile apps, any app's collection and use of Personal Data that is materially different from what's described in this Policy will be supplemented by an individual Privacy Policy that will require acceptance for that specific app.

In addition to the options provided by your mobile operating systems, you may opt out of the collection of information on mobile apps as follows:

- Uninstalling the app. You can stop all collection of information by the app by uninstalling the app. You may use the standard uninstall processes as may be available as part of your mobile device or via the Mobile Application marketplace or network from which you downloaded the app;
- Opt out of interest-based advertising. See the instructions below or contact Us for information about how to opt out from the use of information to serve targeted advertising by advertisers and/or third-party network advertisers. Note that the effect of opting out of targeted advertising will be to prevent targeted advertising, but will not prevent you from seeing all advertisements. Information may still be collected and used for other purposes (such as research, online services analytics or internal operations, and to enforce your opt-out preferences):
- For Apple users: iOS 7 or higher, you can change your settings in the following location: Settings > Privacy > Advertising. iOS 6, you can change your settings in the following location: Settings > General > About > Advertising. For further information please see Apple's website [here](#) (Apple.com)
- For other major mobile platforms: Open the platform account settings, select "Ads".
- Opt out of location data. Go to "settings" on your mobile device to opt out of the collection of location data.
- Opt out of cross-app data collection. The Digital Advertising Alliance ("DAA") offers a separate choice tool for the collection of cross-app data on a mobile device for interest-based advertising and other applicable uses. To exercise choice for companies participating in this choice tool, you can install the DAA's AppChoices [app](#). (<https://youradchoices.com/appchoices>)

7. SECURITY

a. We use reasonable administrative, technical, personnel, and physical measures (a) to safeguard Personal Data against loss, theft, unauthorized use, disclosure, or modification; and (b) to ensure the integrity of your Personal Data. To help Us protect your privacy, you should maintain the secrecy of any logon IDs and passwords, Member numbers, or other identifiers or credentials you may have set up or were provided with in connection with your participation in or use of Our products, services, or websites.

As you may be aware, there is no completely secure method of transmitting or storing data. Although their physical characteristics are different, postal mail, telephone calls, text messages, faxes and transmissions over the Internet or wireless networks all present possibilities of loss, misrouting, interception and misuse of the data that is transmitted. If you have reason to believe that any account with Us is no longer secure, you must immediately contact Us.

We try to strike a balance between the security of your data and your convenience. As a result, We may sometimes use a method of communication that is less secure than a less convenient alternative. For example, but not limitation, We may send you an e-mail or a text message in unencrypted form (i.e. instantly readable) because many of Our customers are unable to access encrypted (i.e. coded) e-mail or messages. This means that Our message, if misrouted or intercepted, could be read more easily than encrypted messages. Such messages may contain Personal Data. Please do not include confidential information, such as your credit card number or account passwords, in any e-mail or text you send to Us or on any posting you make to a public area of a third-party social network page, especially since any such posting immediately becomes public. For a more secure way to communicate with Us over the Internet, please click on the “Contact Us ” link on any of Our websites.

8. DATA RETENTION & INTEGRITY

- a. We retain personal data about Our customers for as long as necessary for the purposes for which it was collected, or unless otherwise allowed by law. Information is stored and accessed in various locations, and cloud services and storage may be utilized. Servers which store information are primarily located in the United States and Europe, although storage may occur in other locations as well.

9. INDIVIDUAL RIGHTS - ACCESS, CORRECTION, SALE PROHIBITION & PORTABILITY

We may retain your Personal Data as is necessary to fulfill the purposes for which the Personal Data was collected. We may also retain this Personal Data as required by law or contract, in order to fulfill Our legal obligations and protect Our legal rights. However, once the purpose for the collection is no longer valid, and there is no legal reason for Us to retain your Personal Data, you have the Right to be Forgotten and may request Us to delete your Personal Data. You may make this request by contacting Us via the mechanism provided below in the “Contact Us” section of this Policy. If We are unable to delete your Personal Data due to one of the reasons described in this Policy, We will provide you with the reason We are unable to fulfill your request.

To access, review, or update your Personal Data covered by this Privacy Policy, please contact Us at the details set out in the “Contact Us” section below. While We will make reasonable efforts to accommodate your request, We also reserve the right to impose certain restrictions and requirements on such access requests, if allowed or required by applicable laws. If you are a member of one of Our membership or rewards programs, you may update your member profile by logging into your applicable member profile.

EUROPEAN UNION "EU" RESIDENTS

EU residents have the right to: (a) request rectification of your Personal Data; (b) object to the processing of your Personal Data for direct marketing purposes; (c) object to the processing of your Personal Data (including profiling) where our legal basis for processing your Personal Data is where such processing is necessary for our legitimate interests; (d) request erasure of your Personal Data; (e) request restriction of your Personal Data; (f) exercise your right to data portability; and (g) object to automated decision making (including profiling). In addition, where we process the Personal Data of EU residents on the basis of their consent as mentioned in this Privacy Policy, they

can withdraw that consent at any time.

You can make a request to us to exercise any of these rights by contacting Us at the details set out in "Contact Us" section below.

CALIFORNIA RESIDENTS

California's "**Shine the Light**" law - **Civil Code section 1798.82** - permits residents of California to opt-out of disclosure of Personal Data to third parties for their direct marketing purposes. You may choose to opt-out of the sharing of your Personal Data with third parties for marketing purposes at any time by submitting a request in writing to Our contact address below. Please note that this opt-out does not prohibit disclosure made for non-marketing purposes. California law also permits residents of California to request and obtain from Us once per calendar year, free of charge, a list of (i) the third parties (if any) to which Personal Data was disclosed for their direct marketing purposes in the prior calendar year and (ii) the categories of Personal Data disclosed to those third parties.

Under the **California Consumer Privacy Act** ("CCPA"), you have the following rights:

- (1) the right to access your Personal Information and request certain Personal Information We have collected about you in the preceding 12 months including (a) the categories of Personal Information collected about you; (b) the categories of sources providing that Personal Information; (c) the categories of third parties with whom We have shared that Personal Information; and (d) the business purpose for collecting that Personal Information; and (e) the specific pieces of Personal Information we collect, use, disclose, and sell. You may make such a request up to twice in a 12-month span;
- (2) the right to request we delete your Personal Information no longer necessary to fulfil our legal obligations or protect Our legal rights;
- (3) the right to opt out of the "Sale" of your Personal Information We have collected. If you exercise that right, please note that pursuant to the CCPA We may have to subsequently inform you that you need to opt-in if the sale of your Personal Information is required to complete a transaction you have initiated. If opting-in is required, We will provide you with the necessary instructions; and
- (4) the right not to receive discriminatory treatment for the exercise of your rights under CCPA.

CANADA RESIDENTS

CNR AUTO allows 'online check-ins' in within CANADA, enabling renters to verify their identity with us remotely. This saves time at the rental counter and reduces the risk of payment card fraud. CNR AUTO uses Key Cafe as a Service Provider in this regard.

For renters with a bank account or locally issued credit card in Canada, we may also share your data with your banking institution, to assist in resolving queries or disputes instigated with or by your bank around our charges. This is on the basis of our legitimate interests, or your instruction.

Any disputes relating to an individual's personal data as processed or stored in Canada at their initiation shall be governed and resolved in accordance with the privacy laws of that country.

If you have any concerns or queries around how your personal data is processed or stored within Canada, or would like to provide us with feedback or a complaint, please contact us at Service@cnrauto.ca

10. COMPLAINTS

Please contact Us as specified below if you have any questions, need access to your Personal Data, or otherwise need assistance. We also are responsible for third-party agents that are processing such data on our behalf, unless we prove that we are not responsible for the event giving rise to the damage. We are also subject to the investigatory and enforcement powers of the Federal Trade Commission with respect to the Framework. Should you have a concerns or complaints about the handling of your Personal Data being in violation of this Privacy Policy, you may contact us directly via the methods described below in the "Contact Us" section. We will work to respond and resolve your complaints in an expeditious manner.

If you are unable to satisfactorily resolve your concerns with us, you may contact the FTC with your concerns.

If you are an EU resident and you have an unresolved concern about Personal Data that We or the FTC have not addressed satisfactorily, We have committed to cooperate

with the panel established by the EU Data Protection Authorities to serve as Our independent dispute resolution body for the Framework.

11. Contact Us

CNR AUTO LTd.
7900 Westminster Hwy Richmond
British Columbia, Canada
Contact Number: 6043701779
Email: Service@cnrauto.ca

We do business in many locations and aim to comply with the privacy laws applicable to the Personal Data we collect and use.

12. CHANGES

We reserve the right to change this Privacy Policy at any time for any reason by posting revisions on this Webpage or on applicable apps or other sites. Such changes will be effective upon posting, but will not apply retroactively. Whenever We make a material change, We will note the date of such update in the introductory paragraph above, and post a note on the home page of our applicable websites.