

## Privacy Policy

This Privacy Policy informs you of the extent to which we process your personal data (hereinafter referred to as “data”).

### 1. Identity of the controller

In accordance with the provisions of the General Data Protection Regulation (GDPR), the entity responsible for processing personal data in connection with this website is:

Mhiri Innovation  
45, rue de la Chaussée d’Antin  
75009 Paris  
France

**Phone:** [+33 9 77 55 50 11](tel:+33977555011)

**E-Mail:** [gb@free2move.com](mailto:gb@free2move.com)

**2. If you have any questions about this privacy policy or our privacy practices, please contact**

**us using the contact details set out at:** <https://www.free2move.com/en-GB/support/>

### 3. General Information

We process data as part of the operation of our website.

Data processing also includes disclosure by means of transmission to third parties and -if necessary- to third countries outside the European Union (“EU”) or European Economic Area (“EEA”). In the case of data transmissions outside EU/EEA, we have specifically marked these transmissions below.

### 4. Data processing

Details regarding the data concerned, processing purposes, legal bases, recipients and transfers to third countries are listed below:

- **Log file**

We log your visit to our website. The following data is processed in this context:

- Name of the website accessed.
- date and time of the access.
- the amount of data transferred.
- the browser type and version.
- the operating system you are using.
- the referrer URL (the previously visited website).
- your IP address
- and the requesting provider.

This is necessary to ensure the security of the website. We process this data on the basis of our legitimate interest according to **Art. 6(1)(f) GDPR**.

The log file is deleted after seven days unless it is required for clarification or verification of specific violations of the law of which we have become aware within the retention period.

- **Hosting**

In order to operate this website and to make our website available we use web-hosting-services. We transmit all data connected to the general operation of this website and specifically the data referred to above (log files) to a web-hosting provider that processes the data on our behalf. We process this data on the basis of our legitimate interest according to **Art. 6(1)(f) GDPR**.

- **Contacting us**

If you contact us, your data (name and contact details – if you have provided them and your messages) will be processed exclusively for the purpose of responding to your inquiry. We process this data on the basis of **Art. 6(1)(b) GDPR** and/or **Art. 6(1)(f) GDPR** in order to respond to your inquiry.

- **Performance of Contracts**

We process personal data of the customer in context of the arrangement of vehicle reservations or rentals.

If you request an offer for or make a booking of a reservation or rental of a vehicle on our website we process the following data: name, e-mail address, telephone number and further information necessary for the performance of the contract (pick-up place, rental period, vehicle and options chosen, financial data). This data is processed exclusively for the purpose of arranging conclusion and performance of the contract.

We process this data on the basis of **Art. 6(1)(b) GDPR** in order to fulfill our contractual obligations.

We transmit your data for the conclusion and performance of the contract to our cooperation partner, with whom you conclude the rental agreement. This data processing is based on **Art. 6(1)(b) GDPR**.

- **User Account**

If you register for a customer account, you agree that your master data (name, e-mail address, telephone number) as well as your usage data (password) will be stored. This allows us to identify you as a customer and allows you to manage your orders. Your data will be processed on the basis of your consent in accordance with **Art. 6(1)(b) GDPR** in order to fulfill our contractual obligations.

## **Legal Basis for Data Processing**

Data processing by cookies is principally based on your consent in accordance with **Art. 6(1)(a) GDPR** or on our overriding interest in the functionality or optimization of our website in accordance with **Art. 6(1)(f) GDPR**.

## **Withdrawal and Objection**

In case of data processing based on your consent you can withdraw your consent at any time with effect for the future. In case of data processing based on our legitimate interests you can object at any time with effect for the future (so called opt-out). You can revoke your consent or object the data processing by configuring the settings of your browser or opt-out the data processing as indicated in the information for the specific service below.

## **Browser Settings**

You can limit or prevent data processing through cookies by choosing an appropriate setting of your browser. You can disable cookies or delete already saved cookies in the settings of your browser.

Further information on the specific browser-settings is available at:

Mozilla Firefox: <https://support.mozilla.org/de/kb/>

Internet Explorer: <https://support.microsoft.com/de-de/help/17442/>

Google Chrome: <https://support.google.com/accounts/>

Opera: <http://www.opera.com/de/help>

Safari: <https://support.apple.com/kb/PH17191?>

## **Cookies**

On our website we use cookies. These are short data packets that are stored on your device (PC, smartphone, tablet etc.) and saved in your browser.

### **Purpose**

In order to ensure functionality and security of our website we use technically necessary cookies. Additionally, we use optional cookies, which provide us further processing options, such as the evaluation of data traffic for advertisement or marketing purposes.

### **Cookie Provider**

Cookies set by us are so called first party cookies. Whereas third party cookies are set by external providers.

### **Cookies Used on This Website:**

#### **Tracking Cookies:**

Inspectlet

Criteo

Google Analytics

#### **Marketing Cookies:**

Bing Microsoft Advertising

Google adwords

Remarketing

### **Cookie Lifetime**

The cookies remain for different time periods on your device.

Session cookies: These cookies are deleted as soon as your browser is closed.

Persistent cookies: These cookies remain stored after you close your browser and enable us to recognize your device the next time you visit our website.

#### **Essential Cookies**

authToken	14 days
Cookie Consent	7 days
Country	7 days

Currency	1 year
Language	1 year
utm	7 days

#### **Marketing Cookies**

Bing Microsoft Advertising	180 days
Google adwords	540 days
Remarketing	30 days

### **Your rights as a data subject**

#### **Information**

Upon request, you may receive information about all personal data that we have stored about you at any time and free of charge.

#### **Rectification, erasure, restriction of processing (blocking), objection**

Should you no longer agree to the storage of your personal data or should such data have since become incorrect, we will arrange for the erasure or blocking of your data or make the necessary corrections (insofar as this is possible under applicable law) upon instruction from you. The same applies if we should only process data to a limited extent in future. In the case of data processing for a task carried out in the public interest or on the basis of our overriding legitimate interests you have the right to object to that processing and to profiling based on it. Furthermore, you have a right to object in the case of processing for the purpose of direct-marketing.

#### **Data portability**

Upon request, we will provide you with your data in a standard, structured and machine-readable format so that you can, if you wish, transmit your data to another controller.

#### **Right to file a complaint**

You have the right to file a complaint at your local data protection office, which in the UK is the Information Commissioner's Office – [ico.org.uk](http://ico.org.uk).

#### **Right to withdraw consent with prospective effect**

You can withdraw your consent at any time with effect for the future. Your withdrawal does not affect the legality of processing conducted before your withdrawal.

#### **Limitations**

The rights described above do not apply to data for which we are not able to identify the data subject, e.g. if anonymized for analysis purposes. Information, erasure, blocking, rectification or transfer to another company with regard to this data may be possible if you provide us with additional information that enables us to make such an identification.

#### **Exercising your rights as a data subject**

If you have any questions regarding the processing of your personal data, or if you would like to request information, rectification, blocking, if you would like to object or have your data erased, or if you wish to transfer your data to another company, please contact the call centre via this link

<https://www.free2move.com/en-GB/support/>