

## NOTA DE INFORMARE PRIVIND PROTECTIA DATELOR PERSONALE

### INFORMATION NOTE ON PERSONAL DATA PROTECTION

Pentru a va presta servicii de inchiriere auto si servicii asociate si avand in vedere reglementarile europene cu privire la protectia datelor cu caracter personal, IMAG trebuie sa colecteze si sa prelucreze informatii personale de la dumneavoastra in conformitate cu prevederile Legii nr. 677/2001 pentru protectia persoanelor cu privire la prelucrarea datelor cu caracter personal si libera circulatie a acestor date si ale Regulamentului UE nr. 679/2016 privind protectia persoanelor fizice in ceea ce priveste prelucrarea datelor cu caracter personal si privind libera circulatie a acestor date, in urmatoarele conditii:

#### 1. Definitii:

- Date cu caracter personal („date personale”): reprezinta orice informatii privind o persoana fizica identificata sau identificabila; o persoana fizica identificabila este o persoana care poate fi identificata, direct sau indirect, in special prin referire la un element de identificare, cum ar fi nume, numar de identificare, date de localizare, identificator online, sau la unul sau mai multe elemente specifice, proprii identitatii sale fizice, fiziologice, genetice, psihice, economice, culturale sau sociale.
- Prelucrarea datelor personale: reprezinta orice operatiune sau set de operatiuni efectuate asupra datelor personale sau asupra seturilor de date personale, cu sau fara utilizarea de mijloace automatizate, cum ar fi colectarea, inregistrarea, organizarea, structurarea, stocarea, adaptarea sau modificarea, extragerea, consultarea, utilizarea, divulgarea prin transmitere, diseminarea sau punerea la dispozitie in orice alt mod, alinierea sau combinarea, restrictionarea, stergerea sau distrugerea.
- Operator: este o persoana fizica sau juridica, care stabileste scopul si mijloacele de prelucrare a datelor cu caracter personal; este acea persoana cu care solicitantul unui serviciu ar urma sa incheie sau a incheiat unul sau mai multe contracte.

#### 2. Categoriile de date personale ce sunt/pot fi prelucrate.

Urmatoarele date pot fi colectate in mod direct sau indirect (platforme de inchiriere, autoritati, alti parteneri):

In order to provide you with car rental and related services and taking into account the European regulations on the protection of personal data, IMAG must collect and process personal information from you in accordance with the provisions of Law No 677/2001 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and EU Regulation No 679/2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, under the following conditions:

#### 1. Definitions:

- Personal data (" private information "): means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity.
- Processing of personal data: means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- Controller: is a natural or legal person who determines the purposes and means of processing personal data; it is the person with whom the applicant for a service would enter into or has entered into one or more contracts.

#### 2. Categories of personal data that are/may be processed.

The following data may be collected directly or indirectly (rental platforms, authorities, other partners):

- nume si prenume;
- adresa de e-mail (pentru efectuarea rezervarii online si pentru confirmarea rezervarii);
- adresa de domiciliu pentru facturare;
- detalii despre angajator si adresa firmei (in situatia in care contractul se incheie cu o persoana juridica)
- numerele de telefon de contact;
- data nasterii (pentru validarea permisului si cerintelor legale);
- informatii de plata, cum ar fi detaliile cartii de credit sau de debit pentru blocarea unei garantii in bani a carei valoare variaza in functie de tipul vehiculului inchiriat;
- informatii din permisul de conducere, inclusiv daca sunteti un conducator suplimentar (pentru validarea permisului);
- informatii din documente de identificare, cum ar fi cartea/buletinul de identitate national sau pasaportul;
- data, ora si locatia preluarii autovehiculului, data, ora si locatia restituirii acestuia, istoricul accidentelor si alte informatii referitoare la vehicul si utilizarea acestuia de catre dvs
- informatii privind incidentele suferite in perioada de inchiriere ( accidente, pierderi, furturi sau deteriorari/defectiuni mecanice ale vehiculului) respective orice raport al politiei sau al tertilor, inclusiv detalii despre cei implicati, natura vatamarilor corporale si/sau a daunelor aduse vehiculului
- informatii despre orice fel de contravenatii/amenzi/infractiuni (ex: depasire a vitezei, parcare neregulamentara, neplata taxelor de trecere etc) constatate in legatura cu autovehiculul inchiriat si perioada inchirierii acestuia
- date captate de sistemul de urmarire GPS a vehiculelor care colecteaza pasiv date si ofera informatii corecte si fiabile in timp real despre locatia vehiculului, starea vehiculului, consumul de combustibil, programarea intretinerii

### 3. Scopurile prelucrării datelor

- Efectuarea de rezervari si gestionarea rezervarii: Folosim datele cu caracter personal pentru a realiza si a gestiona rezervarea inclusiv validarea, prestarea serviciilor si facturarea acestora, rezolvarea anularilor, etc.
- Derularea contractului si rezolvarea problemelor de orice natura ce rezulta din contractul incheiat intre parti referitoare la serviciile oferite, inclusive activitati de post prestare serviciu, cuprinzand si servicii de relatii cu clientii.
- Emiterea actelor de deblocare sau incasare a sumelor preautorizate catre entitatile bancare.

- name and surname;
- e-mail address (for online booking and booking confirmation);
- home address for billing purposes;
- details of employer and company address (in case the contract is with a legal entity)
- contact telephone numbers;
- date of birth (for permit validation and legal requirements);
- payment information, such as credit or debit card details for blocking a cash guarantee, the value of which varies according to the type of vehicle hired;
- information from your driving licence, including whether you are an additional driver (for licence validation);
- information from identification documents, such as national identity card/passport;
- date, time and location of vehicle pick-up, date, time and location of vehicle return, accident history and other information relating to the vehicle and its use by you
- information on incidents during the rental period (accidents, loss, theft or damage/mechanical breakdown of the vehicle), including any police or third party reports, including details of those involved, the nature of the personal injury and/or damage to the vehicle
- information about any kind of contraventions/fines/offences (e.g. speeding, illegal parking, non-payment of tolls, etc.) found in connection with the rented vehicle and its rental period
- data captured by the GPS vehicle tracking system which passively collects data and provides accurate and reliable real-time information on vehicle location, vehicle condition, fuel consumption, maintenance scheduling

### 3. Purposes of data processing

- Making reservations and managing the reservation: we use personal data to make and manage the reservation including validation, provision of services and invoicing, handling cancellations, etc.
- Contract execution and problem solving of any kind resulting from the contract between the parties related to the services provided, including post service activities, including customer relations services.
- Issuance of acts of release or collection of pre-authorized amounts to banking entities.

- Emiterea politelor de asigurare si solutionarea dosarelor de dauna auto.
- Asigurarea masurilor de securitate necesare prin supraveghere video a spatiilor in care se afla vehiculele precum si a bunurilor prin folosirea sistemelor de GPS pe vehicule pentru a preveni, detecta si investiga folosirea neautorizata a vehiculelor conform contractelor de inchiriere/ prevederilor legale; pentru a ne asigura ca vehiculele sunt folosite doar pe teritoriul tarii conform contractului dintre parti.
- Recenzii clienti: Putem utiliza datele dvs pentru transmiterea de chestionare privind gradul de satisfactie privind serviciile oferite de IMAG/partenerii sai scurt despre rezervarea ta. Acest lucru ne ajuta sa intelegem si sa imbunatam serviciul nostru de inchirieri auto si serviciile oferite de partenerii nostri de afaceri.
- **Activitati de marketing:** Folosim datele dvs cu caracter personal pentru activitati de marketing, care pot include: contactarea prin email, telefon sau SMS cu oferte speciale, reduceri si actualizari, inclusiv detalii despre produsele si serviciile noastre. Daca nu mai doriti sa primiti comunicari de marketing (Newsletters), actualizati-va preferintele in profilul sau contul dvs., sau accesati sectiunea de „Unsubscribe”. Daca renuntati la primirea comunicariilor de marketing de la IMAG, este posibil sa va trimitem in continuare mesaje legate de comenzile dvs., sau alte mesaje legate de administrarea contului de utilizator sau actualizarea politicilor noastre , la care nu puteti renunta, atat timp cat aveti un cont de utilizator activ sau un contract/comanda in desfasurare cu noi.
- Detectarea si prevenirea fraudei: Pentru oferirea de servicii profesionale si sigure, utilizam datele cu caracter personal pentru a detecta si preveni frauda si alte activitati ilegale sau nedorite. Pentru identificarea persoanelor autorizate sa tranzactioneze in numele clientilor, beneficiarilor, furnizorilor si/sau prestatorilor nostri de servicii. Solutionarea reclamatilor si solicitarilor, in anume cazuri este necesar sa te identificam pentru a putea da curs unor reclamatii sau solicitari venite din partea ta.
- Scopuri juridice: in cazul in care trebuie sa respectam o obligatie legala (de exemplu, sa raspundem solicitarilor de informatii din partea autoritatilor/institutiilor publice de aplicare a legii).
- Issuing insurance policies and settling car damage claims.
- Ensuring the necessary security measures by video surveillance of the spaces where the vehicles are located as well as the goods by using GPS systems on the vehicles to prevent, detect and investigate unauthorized use of the vehicles according to the rental contracts/legal provisions; to ensure that the vehicles are used only on the territory of the country according to the contract between the parties.
- Customer reviews: We may use your data to submit questionnaires on your satisfaction with the services provided by IMAG/its partners briefly about your booking. This helps us to understand and improve our car rental service and the services offered by our business partners.
- **Marketing activities:** we use your personal data for marketing activities, which may include: contacting you by email, phone or SMS with special offers, discounts and updates, including details about our products and services. If you no longer wish to receive marketing communications (Newsletters), please update your preferences in your profile or account, or go to the "Unsubscribe" section. If you opt out of receiving marketing communications from IMAG, we may continue to send you messages related to your orders, or other messages related to user account management or updates to our policies, which you cannot opt out of as long as you have an active user account or a current contract/order with us.
- Fraud detection and prevention: In order to provide professional and secure services, we use personal data to detect and prevent fraud and other illegal or unwanted activities. To identify persons authorised to trade on behalf of our customers, beneficiaries, suppliers and/or service providers. To deal with complaints and requests, in certain cases it is necessary to identify you in order to be able to deal with complaints or requests from you.
- Legal purposes: where we need to comply with a legal obligation (e.g. to respond to requests for information from public law enforcement authorities/agencies).

Temeiul juridic al prelucrării datelor IMAG prelucrează datele personale având ca temei legal:

Legal basis of data processing IMAG processes personal data on a legal basis:

- incheierea si executarea contractului de inchiriere
- interesul legitim sau obligatia legala a IMAG
- consimtamentul dvs

#### 4. Categoriile de destinatari

Datele personale vor putea fi comunicate, in masura in care acest lucru este necesar si numai in temeiul unui angajament de confidentialitate, urmatoarelor categorii de destinatari in baza si in limitele prevederilor legale sau ca urmare a unor cereri expres formulate de:

- partenerii contractuali tinuti de obligatia de confidentialitate cu privire la datele transmise (brokeri/platforme de rezervare; asiguratori; societati reparatoare/platforme de tractare; societati de leasing; consultanti, contabili, cenzori si auditori, furnizori de servicii: servicii IT, servicii monitorizare flote auto; arhivare in format fizic si/sau electronic; curierat; servicii tehnice de facilitare a platilor (e.g., Visa si Mastercard);
- autoritatile statului (autoritati fiscale, autoritati de protectie a consumatorilor, alte autoritati ale statului), ca urmare a unei obligatii legale a Operatorului;
- instante judecatoresti sau arbitrale, notari publici, avocati, executori judecatoresti, alte servicii autorizate, experti evaluatori.

Toti acesti destinatari se supun acelorasi prevederi legale si ofera cel putin acelasi nivel de protectie ca si Operatorul.

#### 5. Perioada de stocare a datelor

Datele personale vor fi pastrate atat timp cat este necesar sau permis avand in vedere scopul (scopurile) pentru care au fost obtinute si in conformitate cu cele prezentate in prezenta Nota de informare. Criteriile utilizate pentru a determina duratele perioadelor de pastrare includ:

- Prelucrarea (inclusiv stocarea) se realizeaza pe durata de valabilitate a contractelor, dar si dupa terminarea relatiei contractuale pentru o perioada de 10 ani.
- In situatia in care v-ati exprimat consimtamentul pentru prelucrarea datelor cu caracter personal in scop de marketing direct, datele vor fi prelucrate in acest scop pe durata relatiei contractuale, precum si pentru o perioada de 1 an de la incetarea acesteia. In cazul in care va retrageti consimtamentul acordat privind prelucrarea datelor cu caracter personal in scop de marketing direct, acestea nu vor mai fi prelucrate in acest scop, din momentul retragerii consimtamentului, fara ca o asemenea retragere a consimtamentului sa afecteze legalitatea operatiunilor de prelucrare anterioare.

- conclusion and execution of the rental contract
- IMAG's legitimate interest or legal obligation
- your consent

#### 4. Categories of recipients

Personal data may be disclosed, to the extent necessary and only on the basis of a confidentiality undertaking, to the following categories of recipients on the basis and within the limits of legal provisions or following express requests made by:

- contractual partners bound by the obligation of confidentiality with regard to the data transmitted (brokers/booking platforms; insurers; repair companies/traction platforms; leasing companies; consultants, accountants, auditors and auditors, service providers: IT services, fleet monitoring services; archiving in physical and/or electronic format; courier services; technical payment facilitation services (e.g. Visa and Mastercard);
- state authorities (tax authorities, consumer protection authorities, other state authorities), as a result of a legal obligation of the Operator;
- courts or arbitration tribunals, notaries public, lawyers, bailiffs, other authorised services, expert valuers.

All these recipients are subject to the same legal provisions and offer at least the same level of protection as the Operator

#### 5. Data storage period

Personal data will be kept for as long as necessary or permitted in view of the purpose(s) for which it was obtained and in accordance with what is set out in this Information Notice. Criteria used to determine the length of retention periods include:

- Processing (including storage) is carried out during the term of the contracts and also after the end of the contractual relationship for a period of 10 years.
- If you have given your consent to the processing of personal data for direct marketing purposes, the data will be processed for this purpose for the duration of the contractual relationship and for a period of 1 year after the termination of the contractual relationship. If you withdraw your consent to the processing of your personal data for direct marketing purposes, your personal data will no longer be processed for this purpose from the moment you withdraw your consent, without such withdrawal of consent affecting the lawfulness of previous processing operations.

- Datele captate prin sistemul de monitorizare GPS sunt pastrate pe o perioada de 6 luni de la momentul colectarii lor.

In momentul in care IMAG nu mai are nevoie de datele personale, acestea vor fi sterse sau distruse in siguranta.

## 6. Drepturile dvs cu privire la datele cu caracter personal

In orice moment, va puteti exercita oricare din urmatoarele drepturi cu privire la prelucrarea datelor personale:

- Dreptul de acces la datele cu caracter personal si la informatii precum scopurile prelucrarii, categorii de date personale vizate, destinatari sau categorii de destinatari acolo unde este cazul, perioada de stocare a datelor personale. Dreptul la rectificarea datelor cu caracter personal, in situatia in care acestea sunt inexacte sau incomplete.
- Dreptul la stergerea datelor cu caracter personal (dreptul de a fi uitat), in conformitate cu prevederile legale in vigoare.
- Dreptul de retragere a consimtamantului. In situatia in care va retrageti consimtamantul acordat pentru prelucrarea anumitor date cu caracter personal, Operatorul va inceta imediat prelucrarea acestor date si
- Dreptul la restrictionarea prelucrarii datelor. In situatia in care veti contesta exactitatea datelor personale, restrictionarea opereaza pe perioada care permite Operatorului sa verifice exactitatea datelor. De asemenea, aveti dreptul de a obtine restrictionarea prelucrarii datelor daca aceasta este ilegala si va opuneti stergerii datelor ( in situatia in care Operatorul nu mai are nevoie de datele dvs in scopul prelucrarii, insa solicitati expres pastrarea datelor pentru constatarea, exercitarea sau apararea unui drept in instanta, pentru intervalul de timp in care se verifica daca interesele legitime ale Operatorului prevaleaza asupra intereselor dvs).
- Dreptul la portabilitatea datelor, care consta in posibilitatea de a va recupera de la Operator informatiile furnizate, intr-o forma structurata, utilizata curent, lizibila automat, cu posibilitatea ca datele sa fie transferate unui alt Operator.
- Dreptul de opozitie la prelucrarea datelor.
- Dreptul de a nu face obiectul unei decizii bazate exclusiv pe prelucrarea automata a datelor dvs, inclusiv crearea de profiluri care produc efecte juridice sau care te afecteaza semnificativ. Cu privire la adoptarea unei decizii bazate exclusiv pe o prelucrare automata, ai posibilitatea de a-ti exprima punctul de vedere, de a solicita interventia unui operator uman, precum si posibilitatea de a contesta o astfel de decizie.

- The data captured by the GPS tracking system are kept for a period of 6 months from the time of collection. When IMAG no longer needs the personal data, they will be deleted or securely destroyed.

## 6. Your rights regarding personal data

le va sterge in situatia in care nu sunt asociate altor prelucrari bazate pe un alt temei justificat.

- At any time, you may exercise any of the following rights with regard to the processing of personal data:
- The right of access to personal data and to information such as the purposes of the processing, categories of personal data concerned, recipients or categories of recipients where applicable, period of storage of personal data. The right to rectification of personal data if they are inaccurate or incomplete.
- The right to erasure of personal data (right to be forgotten), in accordance with the legal provisions in force.
- The right to withdraw consent. If you withdraw your consent to the processing of certain personal data, the Controller will immediately stop processing such data and will delete it unless it is linked to other processing based on another justified ground.
- The right to restrict data processing. In the event that you contest the accuracy of the personal data, the restriction applies for the period that allows the Controller to verify the accuracy of the data. You also have the right to obtain the restriction of data processing if the processing is unlawful and you object to the deletion of the data (where the Controller no longer needs your data for processing purposes, but you expressly request that the data be kept for the establishment, exercise or defence of legal claims, for the period of time during which it is verified whether the legitimate interests of the Controller outweigh your interests).
- The right to data portability, which consists in the possibility to retrieve from the Operator the information provided, in a structured, commonly used, machine-readable form, with the possibility of the data being transferred to another Operator.
- The right to object to data processing.
- The right not to be subject to a decision based solely on automatic processing of your data, including profiling that produces legal effects or significantly affects you. With regard to the adoption of a decision based solely on automated processing, you have the possibility to express your point of view, to request the intervention of a human controller, as well as the possibility to challenge such a decision.

- Dreptul de a va adresa cu plangere Autoritatii Nationale de Supraveghere a Prelucrării Datelor cu Caracter Personal si instantelor judecatoresti competente pentru apararea oricaror drepturi garantate de legislatia aplicabila in domeniul protectiei datelor cu caracter personal, care au fost incalcate.

Pentru exercitarea acestor drepturi, precum si pentru orice intrebari suplimentare cu privire la aceasta informare sau in legatura cu utilizarea de catre Societate a datelor personale, va rugam sa contactati ofiterul nostru pentru protectia datelor, alegand oricare din modalitatile de comunicare descrise mai jos. Ne puteti contacta:

- Prin email – la adresa: [dpo@imag-rent.ro](mailto:dpo@imag-rent.ro)
- Personal sau printr-o cerere trimisa prin posta – la Sediul societatii mentionat in Contractul de inchiriere

- The right to lodge a complaint with the National Supervisory Authority for Personal Data Processing and the competent courts to defend any rights guaranteed by the applicable legislation in the field of personal data protection, which have been violated.

In order to exercise these rights, as well as for any further questions regarding this information or in relation to the Company's use of personal data, please contact our Data Protection Officer, choosing any of the communication methods described below. You can contact us:

- By email - at: [dpo@imag-rent.ro](mailto:dpo@imag-rent.ro)
- Personally or by a request sent by mail - to the company's head office mentioned in the Rental Contract

Va rugam sa va exprimati acordul dumneavoastra de a fi contactat/ă în scopuri de marketing de către partenerul IMAG SRL sau de către partenerii acestuia prin email și/sau SMS prin completarea bifei de mai jos:

Please express your consent to be contacted for marketing purposes by IMAG SRL partner or its partners by email and/or SMS by filling in the tick below:

DA/YES

NU/NO

**Denumire persoana juridică:**

**Nume si prenume:**

**Numar de telefon:**

**Adresa de email:**

**Semnătură:**

**Data:**

**Name of legal entity:**

**Full name:**

**Telephone number:**

**Email address:**

**Signature:**

**Date:**